

## **BayFirst National Bank Environmental, Social and Governance (ESG) Policy Statement**

As a progressive institution, BayFirst is committed to the highest standards in all aspects of its operations. As both a Tampa Bay community bank and a nationwide lender, we believe it is our responsibility to take an important role in advancing the values we hold, including being an exemplary corporate citizen, providing fair and equitable access to the banking system, engaging with our communities, addressing climate change, providing full disclosure and transparency, providing a safe and secure banking experience, and offering our team the best possible workplace and opportunity for advancement.

### **Fair and Equitable Access to Banking Services**

We work to ensure all in the communities we serve have access to banking and lending services. Our banking institution, BayFirst National Bank, offers Simply Free Checking for those who maintain lower balance accounts and NuStart checking for those who have had past banking troubles. NuStart provides an entrance way back into the banking system. Our Fair Lending Program ensures that our lending services reach majority minority areas on a fair and equitable basis. We have been a leader in providing critical capital to underserved businesses through our Minority Owned Business Lending Program. Our PEACE Team works to ensure residential mortgages are available to both minorities and low-to-moderate income families and individuals, while partnership with the National Association of Minority Mortgage Bankers of America (NAMMBA) helps us to ensure we understand the challenges minorities face in obtaining home financing.

### **Environmental Sustainability**

We are committed to doing our part to protect the planet we all share. We recognize that climate change presents the greatest challenge to our environment. Accordingly, we are undertaking numerous initiatives encouraging energy efficiency and sustainability to ensure we are the best stewards of the environment. We are in the process of obtaining LEED certification of our banking centers, and we are working with We Are Neutral to develop a plan to support a carbon neutral footprint throughout our banking centers. We engage in a comprehensive recycling program in our banking centers and corporate offices to limit waste of paper and plastic and to ensure proper disposal of electronic waste and other office products. We have made substantial investments in infrastructure and leveraged technological advancements in an effort to reduce paper usage.

### **Community Engagement**

We maintain an active community engagement program. Our goal is to support the needs of the communities we serve with philanthropic initiatives, financial literacy education, and providing equitable and fair banking access. We are dedicated to the principles of service under the Community Reinvestment Act and provide volunteer time off for participation in community support and encourage non-profit board representation. Through our Impact Community Engagement program, we identify specific community partners on a quarterly basis throughout the communities we serve to provide both volunteer and financial support.

### **Employee/Workforce Management and Well-Being**

Our philosophy is to provide the most competitive benefit plans possible to attract and retain high quality team members. In addition, we offer our team a progressive and highly productive professional environment as well as competitive pay, professional development, and career advancement opportunities. We are committed to being a market leader in the benefits we provide, including customary health and welfare benefits, retirement plans, life and disability insurance. We provide a wide variety of other benefits, including, among others, an Employee Assistance Program, tuition reimbursement and student loan

assistance, and company match to Dependent Care FSA. We actively promote employee health and wellness initiatives. We also provide multiple means for employees to become owners in our company, including a discounted stock purchase plan, an ESOP, and equity-based compensation plans.

We promote employee wellness through our WellnessFirst program, providing regular information on relevant topics and offering incentives for participation in wellness programs. Ensuring employee safety has been a key priority during the Covid-19 Pandemic. We follow CDC safety protocols and offer flexible work-at-home arrangements for qualified personnel.

### **Governance, Data Security, and Business Ethics**

We prioritize data security through robust information security and data privacy policies and processes. We maintain strict adherence to all regulations and laws regarding data security and cybersecurity. Employees are trained to monitor for identity theft and other forms of cybersecurity threats. We maintain comprehensive information security policies to protect and secure customer information and ensure the monitoring of all transactions to protect customer accounts via best-in-class intelligence technology and fraud monitoring systems.

Our system of internal controls and reporting and disclosure procedures are intended to prevent, deter, and remedy any violation of the applicable laws and regulations that relate to financial reporting and disclosure, accounting and auditing controls and procedures, and other matters pertaining to fraud against shareholders.

We are committed to adhering to the highest standards of business ethics and corporate governance. Our Code of Ethics Policy is designed to ensure adherence to principles of honest and ethical conduct by our board and employees. We maintain an Insider Trading and Confidentiality Policy to encourage adherence to legal and ethical responsibilities pertaining to the market for our securities and the confidentiality of information about our clients and other business associates. We live by the motto of See Something, Say Something, and maintain a Whistleblower and Internal Complaint Policy which encourages our directors and employees to disclose any wrongdoing that may adversely impact the Bank, our customers, or the public at large. We offer an external ethics hotline to foster an environment where employees, officers, and directors can act appropriately without fear of retaliation.