

AVIDBANK HOLDINGS, INC.
CODE OF ETHICS AND BUSINESS CONDUCT
Effective August 8, 2025

1. Introduction

- 1.1 The Board of Directors of Avidbank Holdings, Inc. (together with its subsidiaries, the “Company”) has adopted this Code of Ethics and Business Conduct (the “Code”) in order to:
- (a) promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
 - (b) promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in other public communications made by the Company;
 - (c) promote compliance with applicable governmental laws, rules and regulations;
 - (d) promote the protection of Company assets, including corporate opportunities and confidential information;
 - (e) promote fair dealing practices;
 - (f) deter wrongdoing; and
 - (g) ensure accountability for adherence to the Code.
- 1.2 All directors, officers and employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below in Section 11, Reporting and Enforcement.
- 1.3 The Company’s consolidated subsidiary, Avidbank, a California state-chartered bank (the “Bank”) has adopted a separate set of Code of Ethics and Conduct attached hereto as **Appendix A** (the “Bank Code”). All directors, officers and employees of the Bank are required to be familiar with the Bank Code and comply with its provisions in addition to this Code.

2. Honest and Ethical Conduct

- 2.1 The Company’s policy is to promote high standards of integrity by conducting its affairs honestly and ethically.

- 2.2 Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job.

3. **Conflicts of Interest**

- 3.1 A conflict of interest occurs when an individual's private interest (or the interest of a member of his or her family) interferes, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when an employee, officer or director (or a member of his or her family) takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts of interest also arise when an employee, officer or director (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company.
- 3.2 Loans by the Company to, or guarantees by the Company of obligations of, employees or their family members are of special concern and could constitute improper personal benefits to the recipients of such loans or guarantees, depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of obligations of, any director or executive officer or their family members are expressly prohibited except in the case of loans or other extensions of credit and guarantees provided by the Company's subsidiary, Avidbank, which comply with all applicable SEC and banking regulations, including but not limited to Regulation O.
- 3.3 Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in Section 3.4.
- 3.4 Persons, other than directors and executive officers, who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, their supervisor or the Chief Executive Officer. A supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the chief executive officer with a written description of the activity and seeking the chief executive officer's written approval. If the supervisor is himself or herself involved in the potential or actual conflict, the matter should instead be discussed directly with the Chief Executive Officer.

Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee.

4. **Compliance**

- 4.1 Employees, officers and directors should comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities, states and countries in which the Company operates.

- 4.2 Although not all employees, officers and directors are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. Questions about compliance should be addressed to the Chief Executive Officer.
- 4.3 The laws with which you must comply include “insider trading laws” relating to transactions in our securities. No director, officer or employee may purchase or sell any Company securities while in possession of material nonpublic information regarding the Company, nor may any director, officer or employee purchase or sell another company’s securities while in possession of material nonpublic information regarding that company. It is against Company policies and illegal for any director, officer or employee to use material nonpublic information regarding the Company or any other company to:
- (a) obtain profit for himself or herself; or
 - (b) directly or indirectly “tip” others who might make an investment decision on the basis of that information.
- 4.4 Some of your specific responsibilities are set forth in our Insider Trading Policy. Generally, you are not permitted to buy, sell or otherwise trade in our securities without specific permission in accordance with our Insider Trading Policy, and then only during specified periods. **Please carefully read our Insider Trading Policy in full and contact the Chief Financial Officer if you have questions about it.**

5. Disclosure

- 5.1 The Company’s periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.
- 5.2 Each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each director, officer and employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.
- 5.3 Each director, officer and employee who is involved in the Company’s disclosure process must:
- (a) be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and
 - (b) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

6. Protection and Proper Use of Company Assets

- 6.1 All directors, officers and employees should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and are prohibited.
- 6.2 All Company assets should be used only for legitimate business purposes, though incidental personal use may be permitted. Any suspected incident of fraud or theft should be reported for investigation immediately.
- 6.3 The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any nonpublic financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

7. Corporate Opportunities

All directors, officers and employees owe a duty to the Company to advance its interests when the opportunity arises. Directors, officers and employees are prohibited from taking for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of Company assets, property, information or position. Directors, officers and employees may not use Company assets, property, information or position for personal gain (including gain of friends or family members).

8. Confidentiality

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers or partners, except when disclosure is expressly authorized or is required or permitted by law. Confidential information includes all nonpublic information (regardless of its source) that might be of use to the Company's competitors or harmful to the Company or its customers, suppliers or partners if disclosed.

9. Fair Dealing

Each director, officer and employee must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job. No director, officer or employee may take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.

10. Reporting and Enforcement

10.1 Reporting and Investigation of Violations

- (a) The Company has established procedures for the receipt, retention and treatment of expressed concerns or complaints regarding any actions prohibited by this Code, including honesty, accounting and internal accounting controls or auditing matters, including procedures for the confidential, anonymous submission of concerns regarding questionable accounting or auditing matters. Actions prohibited by this Code involving directors or executive officers must be reported to the Audit Committee chair.
- (b) Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to the reporting person's supervisor or the Chief Executive Officer.
- (c) When reporting a prohibited action, please provide as much detail as possible, including the nature of the transaction or violation, individual(s) involved, location, and dates.
- (d) If you desire to raise your concern anonymously, you can leave a message for the Audit Committee Chair by emailing: AvidbankHRHotline@GetInTouch.com or going online at www.intouchwebsite.com/AvidbankHRHotline.
- (e) After receiving a report of an alleged prohibited action, the Audit Committee, the relevant supervisor or the Chief Executive Officer must promptly take all appropriate actions necessary to investigate.
- (f) All directors, officers and employees are expected to cooperate in any internal investigation of misconduct.

10.2 Enforcement

- (a) The Company must ensure prompt and consistent action against violations of this Code.
- (b) If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board of Directors.
- (c) If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor determines that a violation of this Code has occurred, the supervisor will report such determination to the Chief Executive Officer or General Counsel, if any.
- (d) Upon receipt of a determination that there has been a violation of this Code, the Board of Directors or the General Counsel, if any, will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other

serious violations of the law, notification of appropriate governmental authorities.

10.3 Anonymity and Confidentiality.

You may report any concerns about or violations of this Code anonymously to the extent permissible by law. If you wish to report anonymously, do not provide your name or other identifying information; however, please be aware that this may limit the Company's ability to investigate and address your concern. All reports will be treated as confidentially as possible, subject to the need to investigate and address the matter, and applicable law.

10.4 Waivers

- (a) Each of the Board of Directors (in the case of a violation by a director or executive officer) and the Chief Executive Officer or General Counsel, if any (in the case of a violation by any other person), may, in its discretion, waive any violation of this Code.
- (b) Any waiver for a director or an executive officer shall be disclosed as required by SEC and the rules of the NASDAQ Stock Market, or other principal stock exchange on which the Company's securities are traded or quoted.

10.5 Prohibition on Retaliation. The Company does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct, or other violations of this Code, or participates in any investigation of violations against this Code. If you believe you have been retaliated against, please notify your supervisor or the Chief Executive Officer.

[Signature Page Follows]

I certify that I have carefully read the Avidbank Holdings, Inc. Code of Business Conduct and Ethics and understand its terms and importance and will comply with it. I acknowledge that this Code is a statement of policies for business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.

Signature_____

Date_____

Print Name_____

Appendix A

Avidbank Code of Ethics and Conduct

CODE OF ETHICS AND CONDUCT

SCOPE

This policy establishes the standards of ethics and conduct for director's, officers, and staff members. The policy covers how professionals in the organization approach problems, ethical principles based on the Bank's core values and the standards to which each director, officer and staff member is held.

POLICY STATEMENT

The policy establishes clear standards of behavior. It outlines the expectations and principles that guide decision-making, helping each individual to make ethical choices to align with the Bank's values and goals.

POLICY

The Bank is committed to operating its business with honesty, integrity and the highest level of ethical conduct. This commitment is absolute. Our employees must treat every customer, fellow employee and member of the public accordingly with courtesy, respect and tactfulness both inside and outside of banking hours. Employees must conduct their personal affairs so that there is no opportunity for unfavorable reflection upon the Bank – either expressed or implied.

Independent judgment is critical to the performance of each employee's job. To maintain that independence, employees should avoid any employment, personal or business dealings, or other relationships or activities that could impair independent thinking and judgment.

The Bank has many valuable assets – including its employees, property, information and reputation. It is the duty of every employee to preserve and protect these assets, and to use them only in ways that will promote the best interest of the Bank.

The Bank's reputation of honesty, integrity and security reflects the personal reputation of the Bank's directors, officers and staff members – this reputation for integrity is one of the Bank's most valuable assets. This reputation is protected by the Bank's established Code of Ethics. Outlined below are expected or prohibited behaviors (not all inclusive) which are intended to provide guidance for the ethical behavior of employees both at work and during non-working hours. This information should be used as a guide and is not all inclusive.

I. CORPORATE CONDUCT

The Bank is committed to performing in a manner that acknowledges its interdependence with respect for its social, economic, and physical environment. Our activities should earn

the confidence and trust of our employees, clients, shareholders, and the general public.

Basic principles of corporate conduct can be stated as follows:

- The Bank does not cause or tolerate any violation of law or regulation in the conduct of its business or related activities.
- The Bank is committed to maintaining a level of earnings that provides an equitable return on investments for its shareholders, providing satisfying employment opportunities in its various communities, and providing financial solutions and resources that meet the needs of its clients and the communities it serves.
- The Bank provides pertinent information to authorized auditors or regulatory agencies, and discloses, on a timely basis, information required for judging the soundness of its condition and its merits as an investment.
- The Bank maintains and upholds standards and procedures that are designed to safeguard the legitimate confidentiality of information pertaining to its clients and employees.
- The Bank conducts its business in fair and open competition and does not enter into illegal arrangements with competitors affecting pricing or marketing policies.

II. AVOIDING CONFLICTS OF INTEREST

An employee must not represent the Bank in any transaction where he or she has any material connection or substantial financial interest. A material connection includes the involvement of any family member or close personal friends. This policy includes, but is not limited to, approval of bank overdrafts, authorizing or accepting checks on uncollected funds, waiving of bank charges or late charges, or other normal fees. This also includes making loans, waiving financial statements, or any similar type of activity.

An employee may not accept directorship of another corporation without written approval of the CEO. Employees should also seek written approval for Directorship on organizations, associations or any association where their service would affect their normal work schedule.

III. PERSONAL INTEREST

Employees of the Bank must recognize and are advised to avoid any situation where personal or financial interest or relationships might actually be influential or appear to be

influential on matters affecting the Bank. Consultation with supervisors is appropriate and required if there is any question that an activity may violate or appear to violate this policy.

IV. INVESTMENTS

Bank employees, when conducting their personal investment transactions, should not engage in transactions that create a conflict of interest or the appearance of a conflict of interest with the investment activities of the Bank. Employees should not use or communicate confidential or other “inside information” obtained during their work for their own or another’s personal benefit. It is also improper for an employee to invest in a customer’s business unless the interest is acquired through an organized stock exchange, and the Bank has no access to confidential information or material inside information. Employees are also prohibited from subscribing to new issues of stock in a customer’s business to avoid a conflict of interest.

V. ACTIVITY

While the Bank encourages employees to become involved in positive outside activities, including political activities, these activities can be the basis for conflict of interest. Every employee should notify his/her/their supervisor in writing immediately following an election or appointment to political office. The Bank’s awareness of employee political activity will help avoid conflicts of interest, especially those that could arise from Bank investment activity in the political entity in which an employee is involved.

VI. OUTSIDE ACTIVITIES

Employees must seek written approval from executive management prior to accepting outside employment and participation in the affairs of outside associations and organizations to allow the Bank to evaluate whether a potential conflict of interest or the appearance of a conflict of interest exists. Specific types of outside activities that raise conflict-of-interest questions include, but are not limited to, the following:

- Employment by a company that is a competitor of the Bank.
- Preparation of an audit of statements to be presented to the Bank to secure a loan.
- Publication of books or articles for a fee.
- Rendering investment counsel based on information, reports, or analyses prepared for or by the Bank.
- Rendering accounting services.
- Drawing of wills or practicing law.
- Use of Bank equipment, supplies or facilities for non-bank related matters.

- Performing a service that the Bank itself could perform.
- Personal business ownership or business partnership.

VII. EMPLOYEE RESPONSIBILITIES

The Bank is sensitive to its position as a steward of funds, property, information and the financial affairs of others and is accountable for all that is entrusted to us. The Bank and its employees will take all reasonable steps to safeguard funds, property, information and financial affairs of others against fraud, identity theft, loss or dishonesty.

VIII. PERSONAL ACTIVITIES

Employees are expected to maintain personal integrity and conduct themselves in a responsible manner, in connection with their personal activities, even off premises and outside of working for the Bank. Therefore, employees must refrain from improper or controversial personal conduct, which could adversely affect the Bank's relationship with its clients, its prospective clients, and its business partners and reputation.

IX. INTEGRITY

Employees are expected to act honestly and handle all the Bank's business relationships fairly and professionally, both with internal associates and external clients. Employees should not engage in any illegal or criminal acts or provide any false information. Violation of this policy may lead to disciplinary action up to and including termination of employment.

X. EMPLOYEE PERSONAL FINANCE MANAGEMENT

All employees are expected to conduct their financial business in an exemplary manner that reflects the trust that our clients have placed in us. Every employee should maintain personal fiscal integrity. Each employee should maintain good credit standing and depository relationships with each individual employee's bank of choice.

The Bank may seek prosecution of any employee suspected of embezzlement or misappropriation of funds in connection with his/her/their employment.

The policies and rules of the Code of Ethics contained in this employee policy will be vigorously enforced through audit, examination, and personnel procedures.

XI. COMPLIANCE

Compliance with all applicable laws and regulations, both foreign and domestic, is required by the Bank's Code of Ethics. This is very important to the Bank's corporate image and strategies.

With respect to business conduct, employees should rely on Bank approved policies and

procedures. Deviation from approved policies and procedures cannot be made without the approval of executive or senior management. When applicable, employees who are responsible for creating and maintaining policies and procedures should secure advice, if applicable, from the Bank's legal and compliance representative prior to implementing any change. In the event that any existing or proposed Bank policy, procedure or practice causes a concern regarding possible non-compliance, that issue should be brought to the immediate attention of management.

XII. FALSIFICATION OR ALTERATION OF DOCUMENTS

Employees should not alter any Bank or government documents or provide false information in those documents. This includes information stored electronically.

XIII. ILLEGAL PAYMENTS

No employee shall give any money, gift, unusual hospitality, other items of monetary value, bribe, kickback or any other illegal or improper payment of any kind, to any person with whom the Bank does business or seeks to do business, or to any person with whom the Bank employee meets during carrying out his/her/their Bank responsibilities. The Bank will continue to abide by all laws restricting or forbidding corporate political contributions.

XIV. ASSET PROTECTION

Every employee is responsible for the protection, maintenance and preservation of the Bank's assets. Employees must use Bank assets only for the Bank's benefit. For this provision, "assets" includes information, human resources, equipment, property, physical and financial assets. The Bank's assets should not be used for personal use. Misuse, abuse or pilfering of supplies and equipment may result in disciplinary action up to and including termination of employment.

XV. CONFIDENTIAL NATURE OF WORK

The Bank acknowledges that in the course of employment, employees will have access to certain confidential and proprietary information not available to the general public or the Bank's competitors. Such information is owned by and related to the Bank's operation in tangible or intangible form, and includes but is not limited to:

- Names, addresses, social security number, telephone numbers, financial information and any other confidential information related to potential and actual clients and clients;
- Names, addresses, telephone numbers, or any other confidential information of third parties from which the Bank obtains products and services for its clients;

- Names, addresses, telephone numbers, social security number, financial information and any other confidential information related to employees;
- Business and sales strategies of the Bank;
- Information relating to the Bank's inventions, products and services, research and development, finances, Bank policies and practices, marketing and production, future business plans, strategic plans, methods of business operation, pricing structures and procedures, product specifications, office protocols and systems, computer software, programs and systems;
- Information furnished to the Bank and/or employee by any client or clients of the Bank, or any of the clients or clients' respective representatives or agents;

Employees are not allowed to disseminate, disclose, use, communicate, publish or otherwise divulge, directly or indirectly, themselves or others, any confidential information, (except in the course of the performance of authorized duties on behalf of and for the benefit of the Bank, and only as necessary to perform such duties, or with the prior written consent of the Bank) during their course of employment and following separation from employment, unless that information has become generally available to the public. Employees may only use the Bank's confidential information solely in furtherance of the business of the Bank and not to use in connection with or furtherance of any other business activity or private interest or making a profit during active employment or thereafter. Any other use of the Bank's confidential information is strictly prohibited.

Employees are not to disclose any confidential information and confidential Bank business should never be discussed with anyone outside the Bank and only with employees on a job-related need-to-know basis. Our clients, vendors, and employees entrust the Bank with important information relating to their businesses. The nature of this relationship requires maintenance of confidentiality. In safeguarding the information received, the Bank earns the respect and further trust of our clients, vendors and employees.

If someone questions an employee outside of the Bank or department and the employee is concerned about the appropriateness of giving the individual certain information, the employee should, as politely as possible, refer the individual to his/her/their manager.

No one is permitted to remove or make copies of any Bank records, reports or documents without prior management approval. Disclosure of confidential information may lead to termination of employment, as well as other possible legal action. Employees who knowingly access, obtains, uses, or makes an unauthorized disclosure of confidential information are subject to termination of employment.

During employment and thereafter, employees are prohibited from disclosing or using the Bank's or any client's or customer's trade secrets or confidential information, which includes but is not limited to the Bank's or any client customer lists or confidential personal

and financial information, sales data, pricing data, profit data, business plans, strategic plans, policies, practices, methods of conducting business, and plans for future products, services, or business. Upon separation from employment with the Bank for any reason, employees should immediately deliver to the Bank all trade secret, confidential information, and any copies of such information, in whatever form (paper document, blueprint, flash drives, computer and data memory storage device, etc.,) as well as, delete and appropriately destroy all bank related electronic information immediately from any personal computers and electronic devices.

XVI. USE OF CORPORATE NAME AND LETTERHEAD

The Bank's name, logo and corporate letterhead shall only be used for official Bank business and marketing efforts approved by the CEO and executive management.

XVII. RELATIONSHIP TO THE MEDIA

Only certain employees of the Bank are authorized to speak on the Bank's behalf. Employees should refer all questions or requests for information from reporters and/or other media representatives to the Bank's CEO, or person designated as the Bank's spokesperson.

XVIII. CUSTOMER RELATIONSHIPS

Employees cannot participate in Bank transactions involving persons or firms whom employees, their families or dependents have any relation or financial interests. Employees must advise the Bank in writing if he/she/they believe that they may be involved in a relationship or transaction prohibited by the Bank. The Bank will then evaluate the employee's disclosure statement and notify him or her in writing whether the relationship or transaction is in fact a violation.

Employees should not accept any money, gift, benefit, unusual hospitality or other items of monetary value from any person with whom the Bank does business, with whom the Bank is seeking to do business or from any person seeking to do business with the Bank. The term "person" includes, but is not limited to, clients, other financial institutions, vendors, service providers or any business or professional firm or corporation.

- All Bank business transactions made by employees will be without regard for or relation to personal fees, tips or commissions.
- Employees shall award orders, contracts and commitments to vendors and clients without favoritism. Business of this nature must be performed solely on the basis of merit.
- Employees should not borrow money or accept favored treatment from vendors and/or clients.
- Employees should always provide information to clients so that they may select banking solutions that are best suited to their needs.

XIX. ADVICE TO CLIENTS

No employee should give legal, tax or other professional advice to clients, unless they are authorized to act in a capacity to do so.

XX. GIFTS, FEES, LEGACIES AND LOANS

No gifts, regardless of value, are to be encouraged or solicited by employees in connection with the Bank's business and/or responsibilities. However, employees, as expressions of courtesy and appreciation may accept gifts in kind such as fruits, flowers or candy as long as their monetary value is minimal and does not represent a "substantial gift" (over \$100.00 in value).

Gifts that exceed \$100.00 in value are neither to be accepted, nor, as a general rule, to be given. Employees who receive gifts exceeding this value should report them to their supervisor immediately. For personal protection, employees should never accept a gift in any form or amount if it could influence them, in dealing with the giver, or if the gift could prove compromising or embarrassing. Employees should never accept a gift of money or securities in any amount.

The *Crime Control Act of 1984* ("The Act") makes it a felony for a bank (or bank holding company) employee to accept anything of value in exchange for favorable treatment in any type of bank transaction. The statute makes it a crime for the giver of the gift, as well as the receiver of the gift.

The Act expanded the types of transactions to not only include loan transactions, but any transaction including those of suppliers, professional advisors (attorneys, accountants, etc.), and other day-to-day banking functions with clients or potential clients. Violation of the statute constitutes a felony and could result in fees and penalties.

An employee must not accept a loan from a bank customer or supplier. This prohibition does not apply to loans from banks or other financial institutions on customary credit needs such as home mortgage and consumer credit loans. An employee must not receive anything of value for making a loan. An employee may not do indirectly what he or she is prohibited from doing directly, to include, but not limited to arranging to have a member of his/her/their family accept a gift from a customer, etc.

An employee must not accept a fee for performance of any act that the Bank could have performed or conduct any business that the Bank could have performed.

XXI. WHO ANSWERS YOUR QUESTIONS

The person representing management, with whom employees will have the most direct and frequent contact, is their manager. Any question(s) employees have about the Bank's

policies, procedures, expectations, practices, methods, etc. should be directed to them. Managers will be the employee's principal source of information and guidance and will assist employees in every way possible.

Any employee who is uncertain as to whether a particular situation or proposed course of action is in conflict with the Bank's Code of Ethics and conduct should present the facts concerning the situation to his/her/their supervisor, manager, or the Human Resources Department.

XXII. VIOLATIONS AND ENFORCEMENT

The Bank will seek prosecution for criminal acts perpetrated against the Bank by an employee or other person. Violations of the Bank's Code of Ethics and Conduct, policies and procedures could result in discipline up to and including termination of employment and/or referral for criminal prosecution.

ROLES AND RESPONSIBILITIES

The Board of Directors, company officers, company executive management, and all employees of Avidbank are responsible for upholding the code of ethics and conduct.

RELATED POLICIES

This policy is referenced in the Employee Handbook.

REVISION HISTORY

- January 2025: No material changes
- March 2024: Code of Ethics and Conduct policy is new in 2024 and replaces what was previously covered in the Employee Handbook in prior years.