

Integrity in Action Policy



Integrity in Action Policy

This policy applies to Hancock Whitney Corporation (the Company) and its subsidiaries and affiliated companies.

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Hancock Whitney Corporation and its subsidiaries and affiliates thereof (collectively referred to as “Hancock Whitney”) is committed to its core values of:

- Honor and Integrity
- Commitment to Service
- Teamwork
- Strength and Stability
- Personal Responsibility

In support of these values, Hancock Whitney strives to provide working conditions which promote a culture of high standards of ethical, moral and legal conduct to comply with the following:

- Laws and regulations
- Accounting and auditing standards and practices
- Policies and procedures

1. Policy Definition

The Integrity in Action Program (the “Program”) is a means for any employee (referred to as “associate”) of Hancock Whitney or any customer, vendor, contractor, accountant, attorney or any other person to submit a good faith report to Hancock Whitney’s management regarding a suspected violation of any state or federal law or regulation related to accounting or auditing matters, a violation of any securities laws, or any other unlawful behavior or violation of its Code of Conduct or Code of Business Ethics for Officers and Associates.

The Program is designed to promote an open and ethical atmosphere in which associates feel comfortable reporting concerns or complaints without fear of retaliation. All concerns may be reported anonymously. Associates submitting any such reports may do so without fear of dismissal or retaliation of any kind.

Hancock Whitney’s expectations of ethical conduct for associates are outlined in the following resources:

- Handbook
- Code of Conduct
- Code of Business Ethics for Officers and Associates

Examples of reportable activities include, but are not limited to the following:

1. Theft of money or other items of value whether committed alone or in collusion with fellow associates, vendors or customers
2. Accepting anything of value in return for a business service or confidential information
3. Approving or processing transactions on one’s own account or for relatives or personal relationships
4. Processing documents without proper approval
5. Falsifying documents
6. Fraud and deliberate misstatement in preparation, review, or audit of financial statements or records
7. Deliberate false statements by a senior officer regarding the accuracy of financial records or audit reports
8. Harassment of associates by anyone, including managers, coworkers, vendors, clients, or customers
9. Threats or acts of workplace violence, including but not limited to intimidation, harassment, bullying, physically harming another, brandishing weapons, or talking about any of these activities
10. Creating hazardous or unsanitary work conditions
11. Releasing confidential customer or company information

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Associates should report a concern in good faith. If an associate submits a known false or malicious incident, he or she will be subject to corrective action, up to and including termination of employment.

Hancock Whitney will not tolerate any of the following actions in retaliation against an associate for good faith reporting or an associate who provides assistance in an investigation or implementation of corrective action.

- Discharge
- Demote
- Suspend
- Threaten
- Harass
- Discriminate

Associates should report retaliation to the Chief Human Resources Officer and/or General Counsel.

If an associate or manager retaliates against another associate for reporting a good faith concern, he or she will be subject to corrective action, up to and including termination of employment.

2. Procedures for Reporting

Associates have three options for reporting a concern:

1. Report concerns to the direct manager or next level manager (managers are required to report all incidents to Human Resources or Security).
2. Report to the Chief Human Resources Officer and/or General Counsel.
3. Report to Hancock Whitney's independent third party reporting service, "Ethics Point". Ethics Point provides 24 hours, 7 days a week telephone and internet reporting. Associates will be given the option to give their name or remain anonymous.

Associates are asked to provide specific and factual information. When possible, associates should provide the following:

- Name of associate(s) involved in the activity and any witnesses
- Dates
- Places
- Events
- Supporting documentation such as emails, memos, etc.
- The reason the incident is perceived as a concern

While associates are asked to provide detailed information, they should not do the following:

- Conduct an investigation
- Copy, record, or access any information or documents to which they are not authorized as part of their normal job duties

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3. Ethics Point

To report a concern to Ethics Point, associates have the following options.

- Call toll free: 877-453-7240
- Report online: www.tnwgrc.com/hancockwhitneycorp

Information about Ethics Point is available as noted below on the Intranet.

- Intranet: Home page > Integrity in Action

If an associate calls the Hotline:

1. Calls will be answered by an interview specialist.
2. The interviewer will explain what is expected during the call.
3. Associates will be given the option to give his/her name or remain anonymous.
4. An incident report will be generated.
5. A confirmation number will be assigned.
6. Human Resources, Internal Audit, and if necessary Security will be notified of the report.
7. Personnel will be assigned to investigate the report.
8. If an associate reports anonymously, he or she will be asked to call back at a later date to follow up or submit additional information.
9. If an associate gives his or her name, he or she may be contacted for additional information.

An associate may use a computer and access Ethics Point's website from the Intranet, My Workday or their home computer. If an associate uses a computer:

1. Associates will complete an incident form.
2. Associates will be given the option to give his or her name or remain anonymous.
3. An incident report will be generated.
4. A confirmation number and password will be assigned.
5. Human Resources, Internal Audit and if necessary, Security will be notified of the report.
6. Personnel will be assigned to investigate the report.
7. If an associate reports anonymously, he or she will be able to sign in or call back at a later date to follow up or submit additional information.
8. If an associate gives his or her name, he or she may be contacted for additional information.

Associates will be asked if an incident is likely to occur within 24 hours. If the answer is yes and the situation warrants immediate action, the following will occur:

- The report will be assigned a high priority rating.
- The incident will be investigated.

The Audit Committee Chairperson will be notified of all reports involving executive management, a suspected violation of any state or federal law or regulation related to accounting or auditing matters, or the violation of any securities law.

Upon receipt, the incident will be logged into a secure case management system, assigned to an investigator and investigated promptly. All reports will be kept confidential to the fullest extent possible based on the need to conduct a thorough review and applicable legal requirements. Prompt and appropriate corrective action will be taken as warranted. Reporting and retention will be handled as follows:

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- Receipt, investigation and resolution of each report will be documented.
- Summary management reports will be prepared.
- Reports will be presented to appropriate management and Board Committees.
- Documentation will be retained in compliance with the document retention policy.

4. Exceptions

There are not exceptions to this policy.