

### WHISTLEBLOWER POLICY

# **Definition**

A whistleblower as defined by this policy is an employee of Columbia Financial, Inc., including its consolidated subsidiaries and affiliates of Columbia Financial, Inc. (collectively referred to in this Policy as "Columbia", who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Employees have the right under the "Conscientious Employee Protection Act (CEPA)" to complain about any activity, policy or practice that the employees reasonably believe is in violation of a law, rule, or regulation promulgated pursuant to law. We will remind you of this right at least once a year in and also a notice about it is posted in the breakroom. The notice will remind you of the person at Columbia Bank to whom you should make any such complaints.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

### **Procedure**

If employees of Columbia have a work-related issue, they should discuss it with their Manager. If the issue is not resolved to full satisfaction of the employee, he/she may wish to bring it to the attention of the Department Head. If the employee is still not satisfied, he/she may discuss the issue with the Human Resources Department.

In the event that an employee believes that he/she has been involved in, or has knowledge of, any action concerning the financial matters and/or internal controls of Columbia that may be in violation of law, regulation or public policy, or is fraudulent, the employee should bring their complaints/concerns to the attention of their Manager. If the situation is not handled to the satisfaction of the employee or directly involves the Manager, he/she may inform the Department Head or directly to the Human Resources Department. If the employee remains unsatisfied with the way in which the situation was handled, he/she can present the complaint/concern to any member of Management, including the Human Resources Department

All employees also have the opportunity to take their complaints and concerns at any time directly to the Chair of the Audit Committee. The Audit Committee may be contacted



### WHISTLEBLOWER POLICY

anonymously, either by telephone or US Mail, at the information provided below.

Mr. Michael Massood
Chairman of the Audit Committee
C/o Columbia Financial, Inc.
19-01 Route 208 North
Fair Lawn, New Jersey 07410
(973) 220-3068
mmassood@columbiabankonline.com

In addition, an employee may, on a confidential and anonymous basis, report a complaint or concern through one of the following mechanisms:

- the Company's Hotline at (866) 861-4527
- via email at ColumbiaFinancial@integritycounts.ca
- Via the Internet at <a href="https://www.integritycounts.ca/org/ColumbiaFinancial">https://www.integritycounts.ca/org/ColumbiaFinancial</a>

The Company's Hotline is an attended line, managed for the Company by an independent company that provides reporting services for numerous companies. It is available 24 hours a day, seven days a week.

If an employee chooses to contact the Company on an anonymous and confidential basis, the Audit Committee encourages you to provide contact information with your submission to facilitate follow-up, clarification and assistance with investigation, if necessary.

Members of the Audit Committee will review complaints or concerns that are brought to the attention of the Chair of the Audit Committee of the Board of Directors. The Company ensures the confidentiality of the report, to the extent practicable.

# **New Jersey Conscientious Employee Protection Act Policy**

In accordance with New Jersey State Law and the New Jersey Conscientious Employee Protection Act, an employee is protected against retaliatory action because he or she:

- 1. Discloses or threatens to disclose to a Manager or public body an activity, policy or practice of his/her employer that he/she believes is in violation of a law or regulation.
- 2. Provides information to or testifies before a public body conducting an investigation or



### WHISTLEBLOWER POLICY

- hearing concerning such a violation.
- 3. Objects to or refuses to participate in an activity, policy or practice if he/she reasonably believes that it is in violation of a law or regulation, is fraudulent, or that it is incompatible with a clear mandate or public policy concerning the public health, safety or welfare.
- 4. Provides information involving deception of or misrepresentation to any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of the employer or any governmental entity.
- 5. Provides information regarding any perceived criminal or fraudulent activity, policy or practice of deception or misrepresentation which the employee reasonably believes may defraud any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of the employer or any governmental entity.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as practicable the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against should contact the Executive Vice President of Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

The protection against retaliation, when a disclosure is made to a public body, does not apply unless the employee has brought the activity, policy or practice to the attention of a supervisor of the employee by written notice and given the employer a reasonable opportunity to correct the activity, policy or practice. However, disclosure is not required where the employee reasonably believes that the activity, policy or practice is known to one or more supervisors of the employer or where the employee fears physical harm as a result of the disclosure, provided that the situation is an emergency in nature.

Employees with any questions regarding this policy should contact the Executive Vice President, Chief Human Resources Officer.

Approved by the Board of Directors on January 25, 2024