Northfield Bank Foundation

WHISTLEBLOWER POLICY

PROCEDURES
Northfield Bank Foundation (sometimes referred to as the "Foundation") hereby establishes procedures for the receipt, retention and treatment of complaints received by the Foundation regarding accounting, internal accounting controls, or auditing matters; and the confidential anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

BUSINESS STANDARDS
All employees, officers and directors of the Northfield Bank Foundation shall observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Honesty and integrity is to be stressed in fulfilling responsibilities and in complying with all laws and regulations. All directors, officers and employees have a responsibility to comply with the Conflicts of Interest and an affirmative duty to report violations or suspected violations in accordance with this policy.

GOOD FAITH
Anyone filing a complaint concerning a violation or suspected violation of the Conflicts of Interest or the law must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the code or law. All allegations that prove to be unsubstantiated and to have been made maliciously or knowingly to be false will be treated as a serious disciplinary offense. Employment-related concerns should continue to be reported through normal channels.

PROTECTION
No retaliation shall be made against a director, officer, or employee who reports in good faith, a violation of the Conflicts of Interest. Anyone who retaliates against someone who has reported a violation in good faith should be subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise serious concerns within the Foundation rather than seeking resolution outside the Foundation.

REGISTERING COMPLAINT
In most instances complaints, questions, suggestions, or issues of concern, shall be discussed initially with the Chairperson of the Board. Generally, the Chairperson is in the best position to address an employee's concerns. Alternatively, an employee, because of perceived or actual conflict issues or unsatisfactory resolution, may take an issue directly to the Chairperson of Northfield Bank's Audit Committee. The Chairperson may be contacted by leaving a telephone voice message at 718-448-2706. This is a secure line and only the Chairperson of Northfield Bank's Audit Committee will receive the message and will relay the complaint to the Chairperson of the Northfield Bank Foundation's Audit Committee who will ensure the conflict is appropriately addressed. Information provided will be confidential. Complaints may be provided on an anonymous basis.

The Chairperson of Northfield Bank Foundation's Audit Committee will report all issues to the full Audit Committee of the Foundation (or such board members who are not involved with the conflict) to determine appropriate actions to be taken. The Northfield Bank Foundation's Audit Committee

shall be responsible for the handling of such complaints and shall report to the full board of directors the action taken or to be taken.

CONFIDENTIALITY
All submitted complaints will be treated on a confidential basis. Employees are encouraged to sign their names to the complaint thereby lending a degree of credibility. Also, an investigation into the allegations is enhanced by an opportunity for follow-up questions. Anonymous complaints may be accepted, however, in these cases, the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from reliable sources is required.

TIMELINESS
The earlier a concern is raised improves the chance for successful investigation and resolution. The employee should be prepared to provide as much information as possible to support their allegations. The Northfield Bank Foundation Audit Committee will promptly address all issues and respond in good faith.

Approved by the Board 1/24/2024