

Muncy Columbia Financial Corporation
Journey Bank

WHISTLEBLOWER POLICY

Be it hereby known that Muncy Columbia Financial Corporation or its subsidiary, Journey Bank may not discharge, demote, suspend, threaten, harass, or in any manner discriminate against an employee in the terms and conditions of employment for providing information or complaining about conduct he or she “reasonably believes” constitutes mail, wire, bank or securities fraud, violation of SEC rules or regulations or any federal law relating to fraud against shareholders.

All complaints or concerns by an employee of the corporation regarding internal controls or questionable accounting or auditing matters shall be reported immediately, in writing and signed, to the Audit Committee Chair, presently Edwin Wenner at his business address of 39 Oak Street, Orangeville PA 17859 marked “confidential”.

The Audit Committee Chair will then communicate the complaint/concern to the other Audit Committee members. An investigation will be conducted and results communicated to the appropriate individuals as directed by the Audit Committee. Outside counsel may be retained during the process. The Audit Committee Chair will maintain copies of all complaints, including any supporting documentation.

The names of bank employees submitting confidential concerns shall remain anonymous to the extent possible. No employee will be penalized or discriminated against by the Corporation or any of its employees, contractors, subcontractors or other agents for providing information or assisting in investigations involving alleged violations of securities laws, SEC regulations or securities fraud.

The employee issuing the complaint will be responded to, in writing, within a 60 day period. If the aggrieved employee feels they were discriminated against on the basis of having complained about the covered conduct, they must file a complaint with the Secretary of Labor within ninety days of the alleged discriminatory action.

Approved by Board of Directors November 14, 2023