



Luther Burbank<sup>®</sup>  
*Corporation*

*Code of Ethics and Business Conduct*

1. Our Shared Responsibility.

1.1. The Board of Directors of Luther Burbank Corporation (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 public communications made by the Company;
- (c) promote compliance with applicable 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;
- (g) promote prompt internal reporting of Code violations to the appropriate persons identified in this Code; and
- (h) ensure accountability for adherence to the Code.

1.2. You<sup>1</sup> are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below in Section 18.2, Reporting and Resolving Potential Violations. Consultants, agents, and contract or temporary workers are expected to comply with the underlying principles of the Code.

1.3. The Code does not specifically address all forms of conduct that may raise conflicts of interest or violations of applicable law. In the absence of a specific policy, you must use good judgment and common sense to avoid even the appearance of impropriety. **If you fail to comply with the Code you may be subject to disciplinary action, termination of employment, and/or criminal prosecution.**

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<sup>1</sup> The term "you", "your" or "employee" refers to any director, officer or employee of the Company.



1.4. The Code articulates the Company's internal policy. It is not intended to, and does not create or affect any contractual or legal relationship between the Company and its customers or other unaffiliated parties, nor is it intended to create any legal benefit or be enforceable by any person or entity other than the Company. It does not alter in any manner the "at-will" nature of any employment relationship with the Company.

1.5. In the event of perceived inconsistencies between the Code and any other policies, external regulatory or professional licensure requirements, the more stringent provision applies. If you are unsure which rule to follow, seek guidance from your supervisor or the Legal Department.

2. Honest and Ethical Conduct. The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically. Our mission is to improve your financial future – whether you are a customer, employee or shareholder. In order to remain true to our mission statement, you must act with integrity and observe the highest ethical standards of business conduct in your dealings with the Company's customers, service providers, competitors, employees and anyone else with whom you have contact in the course of performing your duties.

3. Compliance.

3.1. You should comply, both in letter and spirit, with all applicable laws, rules and regulations in the jurisdictions in which the Company operates. Even where a specific law does not prohibit or restrict an activity, standards of ethics continue to apply and require diligent attention to appropriate conduct and corporate citizenship.

3.2. We work in a highly regulated industry. Being aware of and complying with the laws and regulations under which we operate is critical to the Company's success. Violations of law can result in regulator criticism, legal action, fines and penalties, reputational damage, decline in the value of the Company, and other negative repercussions for the Company. Although not everyone is 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 with this Code should be addressed to the Legal Department.

3.3. The Company has adopted policies and/or programs relating to numerous laws, regulations, and rules. Throughout the Code, you will find references to important Company policies and programs; current versions of all policies and programs are available on the Company's intranet. You are to familiarize yourself with the programs and policies relevant to your areas of responsibility. Below is a high-level summary of some of the compliance obligations applicable to you. If you need help understanding a policy, speak with your supervisor or the Legal Department.



(a) Money Laundering. Money laundering is the process of taking the proceeds of criminal activity and making them appear legitimate. Money laundering can involve almost any crime, including terrorist financing, drug trafficking, and human trafficking. The Company's Anti-Money Laundering/Bank Secrecy Act Program ("AML/BSA"), which is available on the Company's intranet, details how we comply with laws and regulations in this area. You must comply fully with the AML/BSA Program and all applicable laws and regulations at all times. The Company expects you to be vigilant and exercise good judgment when dealing with unusual or suspicious customer transactions. Any AML/BSA-related violation could carry significant consequences for the Company and any involved employee.

(b) Competition, Antitrust and Tying. Antitrust laws promote and maintain the benefits of free markets. These laws and the Code prohibit conduct that is collusive or anticompetitive. All predatory or exclusionary conduct that is intended to harm competition is prohibited. Tying arrangements - which force a customer, as a condition of buying one product at a particular price, to have to purchase another - are illegal under some circumstances. You are responsible for being familiar with these rules as they apply to your business dealings.

(c) Anti-bribery & Anti-corruption. You may not engage in any form of bribery, including offering, soliciting or accepting anything of value, directly or indirectly, that is given with the intent to obtain or retain business or secure services. There is no exception for small amounts. Bribery is a crime that can expose at-fault individuals and the Company to significant liability. Please refer to the Company's Bank Protection Act Policy for more detail.

#### 4. Disclosure.

4.1. The Company's periodic reports and other documents filed with its regulators, including all financial statements and other financial information, must comply with all applicable laws, rules and regulations.

4.2. If you contribute in any way to the preparation or verification of the Company's financial statements and/or other financial information, you must ensure that the Company's books, records and accounts are accurately maintained. You must also cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

4.3. If you are involved in the Company's disclosure process, you must:

(a) be knowledgeable about the disclosure requirements applicable to the Company as well as the business and financial operations of the Company;

(b) not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including the Company's independent auditors, governmental regulators and self-regulatory organizations;

(c) properly review and critically analyze proposed disclosures for accuracy and completeness, or where appropriate, delegate this task to others and ensure appropriate supervision of this task;

(d) be familiar with and comply with the Company's disclosure controls and procedures, and internal control over financial reporting as applicable to your area of responsibility; and

(e) take all necessary steps to ensure that all filings and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

4.4. You are expected to cooperate fully with internal and external auditors and government investigators or regulators in connection with any audit or review of the Company. This means you must provide only accurate and complete information to these parties. You must not attempt to improperly influence any auditor, regulator or investigator, nor encourage anyone else to do so. If you believe that someone has made a misleading, incomplete or false statement to an accountant, auditor, attorney, regulator or government investigator in connection with the Company, you must report this immediately to the Legal Department.

5. Maintaining Accurate Records.

5.1. Ensuring accurate and complete accounting and financial records is everyone's responsibility. Accurate record keeping and reporting reflect on the Company's reputation and credibility, and ensure that the Company meets its legal and regulatory obligations. Whatever your part in this process, you are required to be honest and forthcoming and raise any concerns you may have regarding the accuracy of the Company's books and records.

5.2. Never falsify any book, record or account that relates to the business of the Company, customers, employees or third party service providers. This includes entries you make on expense reports, timekeeping records, sales records and claims you make under our employee benefit plans, as well as records relating directly to the Company's operations.



Falsification of Company records could result in civil or criminal penalties, in addition to possible disciplinary action, up to and including, termination of employment.

6. Protection and Proper Use of Company Assets.

6.1. Everyone should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's reputation and profitability, and are prohibited.

6.2. All Company assets should only be used 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 customer information, trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, databases, records and any non-public 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, in addition to possible disciplinary action, up to and including, termination of employment.

6.4. Information you create, send, receive, download or store on Company electronic or telephonic equipment and systems is Company property. We reserve the right to monitor, review, access, record and disclose data as we deem appropriate, subject to applicable laws and regulations.

7. Corporate Opportunities. You owe a duty to the Company to advance its interests when the opportunity arises. You are prohibited from taking for yourself personally (or for the benefit of friends, family members, or any other third party with whom you have a personal or business relationship (collectively, "associate")) opportunities that are discovered through the use of Company assets, property, information or position. You may not use Company assets, property, information or position for personal gain (including gain of an associate). In addition, you may not compete with the Company while you are a director or employee.

8. Confidentiality.

8.1. You may not disclose confidential information to anyone outside the Company. Unauthorized use or distribution of confidential or proprietary information described in this section is a violation of Company policy and may result in civil or criminal action, in addition to possible disciplinary action, up to and including, termination of employment. If you become aware of any disclosure of confidential information in violation of the Code, you must report it immediately.



8.2. You must maintain the confidentiality of all information entrusted to you in the course of performing their duties, even after your relationship with the Company ends, except when disclosure is authorized or required by law as determined by the Legal Department. Generally, Company confidential or proprietary information means any non-public information. Common examples include customer lists or data, intellectual property, unpublished financial data or information, organizational structure, policies, records, wage or salary data, strategic planning, plans for new products and services, marketing plans, customer and vendor lists, projected earnings, product specifications including pricing strategy, information relating to customers and customer relationships, and information about boardroom and executive management discussions and deliberations relating to business issues and decisions. Such information is to be used solely for Company purposes in accordance with Company policies governing information security and not as a basis for personal gain. If you have even the slightest doubt as to whether information about the Company and its business is confidential, you should ask your supervisor or the Legal Department.

8.3. Nonpublic information with respect to Company customers, prospective customers, and vendors acquired by any director, officer or employee is considered to be confidential. Such information is to be used solely for Company purposes. Confidential and proprietary information relating to customers, prospective customers, or vendors includes, but is not limited to all financial information, records, formulas and files of the customer or vendor in the Company's possession and current and prospective customer names, addresses, and other contact information, customer preferences, accounts, lists, vendor lists and employee lists. Except as required in the normal conduct of the Company's business, in no case should such information be transmitted or shared with persons outside the Company or to other employees of the Company who do not need to know such information in the normal discharge of their duties. The only exceptions to this policy are the routine reporting of aggregate data, disclosures authorized or required by law (as determined by the Legal Department), information specifically authorized for release by customers and vendors, or the exercise of whistleblower rights. Each director, officer, and employee is expected to make every effort to avoid a breach of confidential information.

8.4. We are committed to protecting the confidential aspects of our relationship with employees, satisfying the requirements of applicable employment laws, and maintaining uniformity in responding to inquiries regarding present and former employees. To ensure compliance with the Code, any request for information regarding present or former employees must be referred to the Human Resources Department. This includes information relating to employment or salary verification.

8.5. The restrictions on disclosing confidential information are not intended to prevent you or your counsel from initiating communications directly with, responding to any inquiry from, volunteering information to, or providing testimony before, the Securities Exchange



Commission, the Department of Justice, Financial Institution Regulatory Authority, Inc., any self-regulatory organization or any other governmental, law enforcement, or regulatory authority, in connection with any reporting of, investigation into, or proceeding regarding suspected violations of law, and no employee is required to advise or seek permission from the Company before engaging in any such activity. In connection with any such activity permitted above, you should identify any information that is confidential and ask the government agency for confidential treatment of such information. No provision of this Code shall be interpreted, construed, asserted or enforced by the Company to prohibit you from reporting possible violations of federal law or regulation to any governmental agency or entity, or making any other disclosures that are protected under the whistleblower provisions of federal law or regulation.

8.6. If you receive a media inquiry, you must direct the inquiry to the Company's Investor Relations Department. Only authorized employees may post any content related to the Company on social media and you must follow the guiding principles in the Company's Social Media Policy.

9. Fair Dealing. You must strive to treat anyone with whom you have contact in the course of performing your job in a fair, ethical and non-discriminatory manner. Never take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. You must make only complete, factual and truthful statements about the Company, its products, and its services.

10. Conflicts of Interest.

10.1. We are all expected to act in the best interests of the Company and to exercise sound judgment in the execution of our duties. All business decisions should be made free from any conflict of interest. Even the appearance of a conflict can damage your reputation and the Company's reputation.

10.2. A conflict of interest occurs when your private interests (or the interest of your associate) interferes, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when you (or your associate) take action or have interests that may make it difficult to perform your work for the Company objectively and effectively. Conflicts of interest also arise when you (or your associate) receive improper personal benefits as a result of your position in the Company.

10.3. You must never use or attempt to use your position to obtain an improper personal benefit for yourself or for any other person or entity.

10.4. Whether or not a conflict of interest exists or will exist can be unclear. The appearance of a conflict of interest should be avoided. Actual conflicts of interest must be avoided unless specifically authorized.

10.5. You should promptly disclose all conflicts or potential conflicts of interest to your supervisor and the Legal Department who can help you resolve the conflict or determine the appropriate course of action. 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 Legal Department with a written description of the activity and seeking the Legal Department's written approval. If the supervisor is himself involved in the potential or actual conflict, the matter should instead be discussed directly with the Legal Department. If the Legal Department determines there is a conflict, it will be reported to the Chief Executive Officer and the Audit and Risk Committee.

10.6. If you are a director or executive officer, you must seek a determination and prior authorization or approval of potential conflicts of interest exclusively from the Governance and Nominating Committee. Where necessary to avoid an actual or potential conflict of interest, if you are a director, you must recuse yourself from any Board deliberations and decisions.

## 11. Gifts and Entertainment.

11.1. Federal and state laws make it a crime for Company employees to solicit or accept anything of value from third parties in connection with or in exchange for any business or transaction of an insured financial institution. It is important that you avoid any appearance of potential bribery or improper influence by loan applicants, customers, competitors, consultants, and vendors.

11.2. You are prohibited from seeking or accepting gifts from third parties in connection with any transaction or business of the Company. "Gift" includes, but is not limited to, substantial favors, money, credit, special discounts on goods and services, free services, reimbursement for travel expenses, loans of goods or money, tickets to entertainment or sporting events, or excessive entertainment. Cash and cash-equivalent gifts are strictly prohibited and must be politely, yet firmly, returned to the donor. Gifts to an employee's immediate family are included in this section. You need not benefit from the gift; accepting items of value for the benefit of a third party is also prohibited. Generally, you may also not accept a bequest, legacy, benefit or interest in property under a trust from a customer or vendor (other than a family member).

11.3. You are also prohibited from offering anything of value to someone with whom you transact business if the benefit is not otherwise available to similarly situated Company customers or suppliers under similar circumstances.



11.4. Meals, refreshments and accommodations or entertainment may be exceptions to this policy if:

- (a) Such expenses are provided in the course of a meeting or other occasion for which the purpose is to hold bona fide business discussions;
- (b) The expenses are of reasonable value; and
- (c) The Company would have paid for these expenses as a reasonable business expense, had they not been paid for by the third party.

11.5. Under certain limited circumstances, the refusal of a gift may damage customer relations. Under those circumstances, if the value of the gift is over \$500, you must report the gift and the circumstances of the gift to your supervisor and the Legal Department.

12. Communicating Responsibly.

12.1. Media Inquiries. If you receive a media inquiry, you must direct the inquiry to the Company's Investor Relations Department. Do not make any statements on behalf of the Company in any context unless you are authorized to do so.

12.2. Social Media. Only authorized employees may post any content relating to the Company on social media. All your social media activity must comply with the underlying principles set forth in our Social Media Policy.

12.3. Other Public Statements. Do not make any statements on behalf of the Company in any context unless you are authorized to do so.

13. Outside Activities.

13.1. Other Employment. Your job with the Company must always be your first priority; outside employment is discouraged. You may not accept any employment that creates a conflict of interest (such as employment with another financial services company). Employees may not serve as a director, trustee, officer, advisory board member or consultant or in a similar paid or unpaid position without receiving prior approval using the process described in the Handbook. This does not apply to political, non-profit or social organization, or to residential boards whose activities do not conflict with the Company's interests.

13.2. Teaching or Speaking Engagements. You must obtain approval from your supervisor prior to accepting teaching or speaking engagements. In the course of such an engagement, you should never make statements on behalf of the Company unless you have been specifically authorized to do so.



13.3. Political Activities. The Company encourages you to be engaged in your community and to participate in political activities. However, you may do so only on your own time and with your own resources. You must ensure that your political activities cannot be viewed as connected with your position at the Company. Using your position of authority to pressure or compel another employee to participate in any way in any political event or cause is strictly prohibited. You must consult with the Legal Department before accepting an appointive office or running for an elective office. You have the right to make personal political contributions from your own funds, subject to applicable legal limits and regulatory requirements, but you cannot be reimbursed or compensated by the Company for any contribution you make. The Company does not make contributions of corporate funds to, or independent political expenditures on behalf of, political candidates, campaign committees, political parties or other political groups.

13.4. Charitable Contributions. The Company supports various charities in the communities in which it operates, and encourages your personal involvement through Company-sponsored programs. All charitable contributions on behalf of the Company must receive the pre-approval of the Fair and Responsible Banking Officer.

14. Personal Finances.

14.1. Financial Responsibility. As an employee of a financial institution, it is important that you consistently demonstrate an ability to properly manage your personal finances. You must handle your personal finances responsibly, with integrity, and in compliance with the law. Imprudent personal financial management and its consequent hardships may affect job performance and may occasionally lead to more serious consequences for employees in positions of trust.

14.2. Borrowing and Lending.

(a) 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 related interests as defined in Regulation O, 12 C.F.R. Part 215, are expressly prohibited.

(b) You are prohibited from negotiating or approving any loan or other transaction between the Company and you, your family members, or any company in which you or your family members have an interest or that will result in a direct or indirect benefit to you, your family members, or any company in which you or your family have an interest.



(c) You may not borrow money from, or lend money to, or act as a guarantor, co-signer or surety for customers, vendors, or fellow employees, unless the transaction involves a family member. Borrow only from reputable organizations that are in the business of lending. If you borrow from a financial institution, the loan must be obtained on non-preferential terms.

14.3. Deposit Accounts and Transactions.

(a) Overdraft. Insufficient fund and overdraft activity involving employee accounts with the Company is strongly discouraged and may result in closure of the accounts.

15. Personal Transactions. You must transact all personal financial business with the Company following the same procedures that are used by customers. You are not allowed to handle or approve your own transactions, or transactions on accounts over which you or your immediate family have an ownership interest, control, or signing authority. You may not request any exceptions from Company employees or engage in any coercion, real or perceived, upon the employee responsible for processing the transaction.

15.1. Investment Prudence. You must avoid imprudent, speculative, or questionable investment activity beyond your means and should strive to exercise prudent judgment in making personal investments. You should not accept preferential treatment of any kind based on your position with the Company in connection with your investments.

15.2. Permitted Public Company Investments. Generally, you may freely invest in publicly traded companies. Ownership of less than one percent of a publicly traded company generally does not present concerns. However, you should be cautious in the case of investments that could affect or appear to affect your decision-making on behalf of the Company. You should avoid investing in our publicly-traded competitors. For these purposes, a competitor is defined broadly to include other financial services companies. You may not make or hold a significant investment in a private company that competes with or does business with the Company without first seeking approval of the Legal Department. Note that these restrictions do not apply to mutual funds or similar investments in which you do not have direct or indirect control over the particular investments included in the fund.

15.3. Material, Non-Public Information and Prohibited Trading. As an employee of a financial services company, you may have access to material non-public information about our Company, our clients and other companies that conduct business with us. You may not buy or sell securities for your own account or any account over which you exercise control when you are in possession of material non-public information relating to those securities. You may not

pass along such information or tip anyone to buy or sell securities while in possession of such information relating to those securities.

15.4. Investing with Customers and Vendors. You may not enter into or participate in business ventures with the Company's customers or vendors without prior approval from the Legal Department.

16. Giving Legal, Tax, Investment and Other Advice. Employees may not under any circumstances give legal, tax or investment advice to customers or fellow employees. The Company's attorneys are employed to render legal services to the Company and should not be asked to provide personal advice to employees, customers or others.

17. Employee Relations. The Company maintains an Employee Handbook (the "Handbook") that details our personnel policies and addresses issues of importance to employees. The Handbook is available to all employees on the Company's intranet. You must treat everyone in the workplace with respect, fairness and dignity. We do not tolerate discrimination, harassment or intimidation and ask that you report any conduct in violation of our policies or the Code. Please see the Handbook for more information.

18. Reporting Certain Conduct.

18.1. Reporting Obligations. If you discover or suspect that something is illegal or unethical, you have not only the right, but also the obligation, to report your concerns. The Company encourages you to maintain an ongoing open dialogue with your supervisor on business and conduct concerns and expects you to speak up when something is unclear. You are required to promptly report any known or suspected violations of the Code, any internal Company policy or any law or regulation related to our business. This includes, but is not limited to, knowledge or information about conduct by another employee or agent of the Company that you reasonably believe to be: (a) a crime; (b) a violation of law, regulation or policy; (c) a dishonest act, including misappropriation of funds or anything of value from the Company, or the improper recording of the Company's assets or liabilities; and (d) other circumstances or activities that may conflict with the Code. Reporting is required whether the violation involves you or someone else. You may be held responsible for not reporting the actions of others if you knew or should have known that they were in violation of the Code. The Company relies on you to speak up when something is unclear.

18.2. Reporting and Resolving Potential Violations.

(a) Actions prohibited by this Code involving directors or executive officers must be reported to the Audit and Risk Committee or another designated committee of the Board of Directors. Actions prohibited by this Code involving anyone other than a director or

executive officer must be reported to the reporting person's supervisor, Human Resources, the General Counsel, or the Executive Vice President that oversees the business unit.

(b) You may also make a confidential anonymous report via the LBS Ethics Hotline website. Please see our policy Confidential Reporting of Violations of Law or Regulation for additional details.

(c) The Audit and Risk Committee and/or the Legal Department resolve all issues regarding the Code, including potential violations and certain exceptions, and reviews information from the Ethics Hotline.

(d) You are expected to cooperate in any internal or external investigation of potential violations.

### 18.3. Enforcement.

(a) The Company shall ensure prompt and consistent action against violations of this Code.

(b) Upon receipt of a determination that there has been a violation of this Code, the Company 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 to appropriate governmental authorities.

18.4. Waivers. The Audit and Risk Committee must approve any waiver of the Code for a director or executive officer. The Company will promptly disclose any such waiver on its website or through a press release or other public filing as required by applicable law or regulation.

18.5. Prohibition on Retaliation. No one who suspects a violation and reports it in good faith will be subject to retaliation or intimidation for making such a report. "Good faith" means you've provided all the information you have and believe it to be true. In addition, you will not face retaliation due to your participation in an investigation of a report. Any director, officer, or employee who engages in retaliatory acts or knows of an occurrence of retaliation and either fails to stop such acts or fails to report such acts, will be subject to disciplinary action, up to and including, termination of employment. If you have concerns about or are aware of possible retaliatory action, you must report it.

**ACKNOWLEDGMENT OF RECEIPT AND REVIEW**

To be signed and returned to the Legal Department.

I, \_\_\_\_\_, acknowledge that I have received and read a copy of the Luther Burbank Corporation Code of Ethics and Business Conduct. I understand the contents of the Code and I agree to comply with the policies and procedures set out in the Code.

I understand that I should approach the Legal Department if I have any questions about the Code generally, or any questions about reporting a suspected conflict of interest or other violation of the Code.

\_\_\_\_\_  
NAME

\_\_\_\_\_  
PRINTED NAME

\_\_\_\_\_  
DATE