

GENERAL.....	2
Who is a “Whistleblower?”	2
POLICY AGAINST RETALIATION.....	4
REPORTING CONCERNS UNDER THIS POLICY	4
Where to Report a Concern.	4
What to Report.	5
How to Report a Concern.	5
What to Expect After Reporting a Concern.	6
COMPLAINT FORM.....	7

GENERAL

The Sarbanes-Oxley Act (SOX) was enacted in 2002 in response to corporate and accounting scandals at major public companies like Enron and WorldCom. It aims to promote corporate accountability, protect investors, and protect employees who report certain misconduct, also known as whistleblowers. The Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank) amended SOX in 2010 and created new protections for whistleblowers and incentives for reporting wrongdoing to the Securities and Exchange Commission (SEC).

This policy describes the following:

- definitions of “whistleblower”
- activities protected by the two laws mentioned above, SOX and Dodd-Frank.
- activities protected by other laws that the Corporation encourages employees to report internally.
- whistleblower protections, including safeguards against retaliation.
- options for reporting securities-related and other concerns.

Who is a “Whistleblower?” Under the two laws named above, a whistleblower is a person who voluntarily provides the SEC with original information in writing about a possible violation of the federal securities laws, such as fraud or other wrongdoing, that has occurred, is ongoing, or is about to occur.

For internal purposes or other governmental agencies, a whistleblower may be any person who voluntarily provides the Corporation or governmental agency with information about other possible unlawful conduct or wrongdoing.

Examples of securities-related wrongdoing:

- Ponzi scheme, Pyramid scheme, or a High-Yield Investment Program
- Theft or misappropriation of funds or securities
- Manipulation of a security's price or volume
- Insider trading
- Fraudulent or unregistered securities offering
- False or misleading statements about a company (including false or misleading SEC reports or financial statements)
- Abusive naked short selling
- Bribery of, or improper payments to, foreign officials
- Fraudulent conduct associated with municipal securities transactions or public pension plans
- Initial Coin Offerings and Cryptocurrencies
- Mail, wire, bank, or securities fraud or other fraudulent conduct involving securities or against the Corporation's shareholders under federal law.
- Violation of any SEC rule or regulation

The following are examples of other potentially unlawful conduct the reporting of which is not protected activity under securities-related laws but may be protected under other laws or Corporate policy:

- Generally Accepted Accounting Principles (GAAP). (However, misclassification of items in a financial statement such as inadequate internal controls over financial reporting or a reasonable belief that booking taxes as revenue was securities fraud may be the basis for a securities-related claim.)
 - Concerns about financial statement disclosures, accounting or internal accounting controls, auditing matters, or similar concerns
 - Violations of the Corporation's Code of Ethics or any Code of Conduct
- Discrimination or harassment unrelated to fraud or securities issues
- Other non-securities fraud issues
- Violations of banking regulations
- Violations of SOX that do not involve shareholder fraud
- Anti-bribery and books-and-records provisions of the Foreign Corrupt Practices Act.

We strongly encourage employees to also report these types of concerns so that they can be investigated and resolved if wrongdoing is discovered. Employees may use the same reporting system to report these types of concerns. See *Reporting Concerns Under this Policy* below.

POLICY AGAINST RETALIATION

To encourage open communication and the freedom to report concerns either to the Corporation (internally) or to an outside entity such as the SEC, the Corporation strongly prohibits any type of retaliation against any employee who makes a good faith report under this policy. Specifically, no person will suffer harassment, discrimination, or other adverse employment action (demotion, termination, wage reduction, or significant adverse change in terms and conditions of employment) as a result of reporting concerns under this policy.

All employees are also protected against retaliation for providing information, filing, testifying, participating in, or otherwise assisting in a proceeding or anticipated proceeding related to alleged violations, or otherwise assisting in the investigation of potential wrongdoing. Likewise, employees are protected from retaliation for making disclosures that are required or protected under law or objecting or refusing to participate in any activity the employee reasonably believes to be unlawful.

“Employees” include present, past, and future employees of the Corporation, including executives, officers, and members of management, as well as some independent contractors.

REPORTING CONCERNS UNDER THIS POLICY

Whistleblower complaints are taken very seriously by the Corporation and outside entities. Therefore, all reports must be made in good faith with a reasonable belief of wrongdoing or unlawful conduct. Information provided must be accurate, honest, and complete to the best of the reporter’s knowledge.

Where to Report a Concern. All concerns may be reported with or without disclosing the reporter’s identity (i.e., anonymously).

Securities-related concerns may be reported to one or more of the following:

- The Corporation, to an individual who is authorized to investigate, discover, or terminate misconduct.
- The Chairperson of the Audit Committee of the Corporation’s Board of Directors
- The Securities Exchange Commission (SEC)
- Members or a committee of Congress
- Federal regulatory or law enforcement agencies

Concerns unrelated to securities may be reported to one or more of the following:

- The Corporation, to an individual who is authorized to investigate, discover, or terminate misconduct.
- The Chairperson of the Audit Committee of the Corporation's Board of Directors
- Federal regulatory or law enforcement agencies with oversight of the alleged violation (for example, the US Department of Labor, FINRA, etc.)

What to Report. Concerns may be reported verbally or in writing with or without disclosing the identity of the person making the complaint. A Complaint Form is provided at the end of this policy. However, individuals are not required to use this form and may report concerns in any format (by phone, email, in-person, online, etc.).

Any report should provide at least the following information:

- Your full name and contact information, including mail and email addresses, and telephone numbers [This information is OPTIONAL. You may submit a report anonymously.]
- Contact information for any individual or company you mention in the tip or complaint, including their full name, mail and email addresses, and telephone numbers;
- A detailed description of the events or circumstances giving rise to your complaint – including who was involved in the conduct and how, why, and when the conduct occurred; and
- Any relevant documentation.

How to Report a Concern. See our Employee Handbook/Key Contracts section for contact information (email and phone number) for Corporate individuals to whom you can make an internal report.

Information and report forms may be available online on the website of relevant federal or state agencies or Congressperson.

Written concerns may be submitted to the Audit Committee's Chairperson at:

Peter C. Varischetti
Audit Committee Chairperson – CONFIDENTIAL
1308 Main Street

Brockway Pa 15824

The mail is reviewed at least one time per week by the Committee Chairperson or designed representative.

What to Expect After Reporting a Concern. Concerns submitted to an outside entity such as Congress or a federal agency, will be conducted in accordance with their own investigation procedures.

Concerns submitted to the Corporation, including the Chairperson of the Audit Committee, will be promptly investigated by the Corporation and/or Chairperson, their respective designated representative(s), outside professionals such attorneys, accountants, and/or investigators, or other individuals in the position to discover and analyze potential violations.

All individuals will use reasonable efforts to protect the confidentiality and identity (if known) of the person(s) reporting the concerns.

At the conclusion of the investigation, a finding will be made and, if necessary, appropriate disciplinary action taken. The Corporation will advise the individual who submitted the report of the outcome. When appropriate, the Corporation will also take preventative measures to avoid the same or similar violations in the future.

Reports and related documentation will be retained for no less than 7 years.

Direct any questions about this policy to the Chief Operating Officer, Chief Risk Officer, or Chief Human Resources Officer.

COMPLAINT FORM

Please type or print.

1. You are not required to provide your name or contact information. Doing so, however, allows an investigator to follow up with you.

(Optional)

Name:

Phone number:

Email address:

Other contact information:

My preferred method of contact is: phone email other

2. Name, company, position, department, and contact information of the person or persons who you believe to be involved in the concerns you are reporting. If you do not know all of the requested information, provide information to the best of your ability.

3. Your report is related to which issues(s)? Check *all* that apply.

___ Securities-related concerns

___ Financial Statement Disclosures

___ Fraud

___ Accounting or Internal Accounting Controls

___ Violation of banking or other non-securities laws or regulations

___ Auditing Matters

___ Violations of the Corporation's Code of Ethics

___ Other violation or concern (please identify) _____

___ Unknown (describe below)

4. Describe, in detail, the acts or omissions you reasonably believe are unlawful. (Attach additional pages if needed.)

5. Attach any relevant documentation.

The information provided above is true, accurate and complete to the best of my knowledge.

If reporting anonymously, check here to make the above affirmation.

Please affirm the above statement by signing below.

Signature

Printed Name

Date