

SOCIAL MEDIA POLICY

Overview

Mission Valley Bank recognizes the importance of social media in shaping brand perception, building trust, and engaging with specific, key demographics. Our Social Media Policy is built to capture the full potential of these platforms, ensuring that our communication is effective, responsible, and aligns with our brand marketing goals and objectives.

Social media is a key component of our 360-marketing campaigns. It allows a seamless and interactive brand experience, connecting traditional and digital marketing efforts. By leveraging social media, we can create cohesive stories that resonate across all touch points, enhancing our client engagement and reinforcing our marketing tone and messaging. Our policy also includes staying ahead of cultural, business, and marketing trends to ensure that our content remains relevant, respectful, and engaging.

As an organization, Mission Valley Bank's Social Media Policy is designed to optimize engagement in a manner that is responsible and impactful. Our goal is to ensure that every touch point contributes to our brand equity, delivering value and maintaining trust that our clients have in Mission Valley Bank.

Mission Valley Bank's Social Media Audiences

Mission Valley Bank's social media efforts are targeted at several audiences:

1. **Existing and New Customers:** This audience includes clients who have an established relationship with Mission Valley Bank as well as potential clients who may be considering our products and services. The engagement strategy will be to share content that highlights our current banking services; it will also promote our future innovation pipeline for digital interactive tools such as financial wellness, podcasts, and webinars.
2. **Existing and Prospective Employees:** To provide our current workforce and potential team members who may be interested in joining Mission Valley Bank. To attract and maintain these professionals, our content will focus on company culture, career opportunities, and professional development.
3. **Community At-Large:** This audience includes members from the local community, industry peers, media and other stakeholders. The policy will consist of community development initiatives, social responsibility activities, financial insights and trends along with specific, targeted events sponsored by the bank.



Purpose

Mission Valley Bank acknowledges that the Internet provides numerous channels for our team members to participate in interactive discussions and share information using a variety of social media forums. We respect and support each employee's decision regarding personal participation in social media. This policy and the guidelines contained herein are intended to clearly communicate Mission Valley Bank's expectations regarding our employees' responsibilities when engaging in any social media platform.

To mitigate risks related to business operations, systems integrity, reputation, and legal concerns, as well as to prevent any decline in employee performance and productivity, Mission Valley Bank emphasizes the importance of responsible social media use. We expect our employees to strictly follow the guidelines and rules outlined in this document. Additionally, it is critical that our final institution's technology resources and communication systems are utilized solely for business activities. Employees are encouraged to use common sense and discretion in their use of social media to ensure compliance with our organization's standard and practices.

SOCIAL MEDIA POLICY (CONTINUED)

Scope

This policy applies to all social networking activities that may impact on our organization, employees, clients, and/or business partners as well as the Bank's compliance with regulatory requirements, and/or its reputation, whether such activity occurs through the bank's network access or other means. This policy also addresses the oversight and administration of Mission Valley Bank's social media sites.

Team Member Accountability

All employees must be authorized by Mission Valley Bank's Marketing Manager as well as a member of the Bank's Executive Committee prior to conducting any company business for Mission Valley Bank using online social media, including but not limited to Facebook, X, YouTube, LinkedIn, Instagram, Pinterest, YouTube, Google+ and blogs.

Activities Not Permitted: Unless such activities are included in your job description, or such activities have been assigned to you by the Vice President, Marketing Manager and at least one member of the Executive Committee the following activities are not permitted:

1. Engage in social media on the company's network at any time, unless for professional use (i.e. LinkedIn). NOTE: Mission Valley Bank reserves the right to use tools to monitor, review, or block content on company owned devices that violate Mission Valley Bank's policies and/or guidelines.
2. Speak on behalf of Mission Valley Bank with customers via social media, including through private messages.
3. Speak on behalf of Mission Valley Bank in any public manner, including social media, without prior authorization from the Marketing Manager and at least one member of the Executive Committee.
4. Discuss sensitive information about Mission Valley Bank's clients, customer non-public information or proprietary or trade secret information via social media.
5. Post photographs of people engaged in company business or at company events without their permission.
6. Post advertisements of company products or sell company products and services on personal blogs.
7. Offer legal, banking or professional expertise on behalf of Mission Valley Bank.

8. Mission Valley Bank's social media policy forbids the posting of specific accounts / product requirements, annual percentage rates, annual percentage yields, loan terms, etc. or any other information requiring additional disclosures.

Identifying Your Mission Valley Bank Relationship via Social Media: If you identify yourself as an employee of Mission Valley Bank or Mission Valley Bank as your employer, either directly or as part of a user profile, all employees should ensure that their profile and related content are consistent with Mission Valley Bank standards and policies. Unless otherwise authorized, any posts regarding Mission Valley Bank and/or its business should include the following statement, "The views expressed in this post are my own and not those of Mission Valley Bank, or of any person or organization affiliated or doing business with Mission Valley Bank."

Senior Management Responsibilities: Members of Mission Valley Bank's Executive Committee and Senior Management Team members have unique responsibilities on their social media platforms. Even if you do not explicitly identify yourself as being affiliated with Mission Valley Bank, Executive Committee Members or as a part of Senior Management, these team members should assume that their content will be viewed by Mission Valley Bank's employees, , shareholders, clients, business contacts as well as colleagues and peers.

AMENDMENT 1/4/25

Activities Permitted: The Vice President, Marketing Manager and the Executive Vice President | Chief Banking Officer will allow Mission Valley Bank SBA BDO team members to post 'approved' individual SBA Success Stories on their own pages with 'approved' captions.

SBA BDO are the only Mission Valley Bank channel to post 'approved' SBA Success Stories and 'approved' captions. All other digital media content will follow the rules listed above.

SOCIAL MEDIA POLICY (CONTINUED)

Guidelines

These guidelines are intended to help team members that participate in social media to clearly understand Mission Valley Bank's expectations regarding our employees' responsibilities when engaging in its use. They also serve to protect the privacy, confidentiality and interests of Mission Valley Bank and its customers. Note that these guidelines are not meant to infringe upon an employee's personal interaction or commentary online. Regardless, all team members should use their best judgment to determine the potential impact that personal interactions may have upon Mission Valley Bank and its customers, vendors and others. Ultimately, team members may be held accountable to ensure that their personal social media interaction is appropriate and consistent with this policy and all other related MVB guidance.

Review of Posts: All company social media posts must be reviewed and approved for publishing by the Vice President Marketing Manager and one Executive Committee member or two Executive Committee Members, prior to publishing. Some company posts may also be required to be reviewed by Compliance, Risk Management, Legal and/or senior management.

Confidential/Proprietary Information: Under no circumstances should Confidential Information, proprietary and/or information that has not been publicly released by Mission Valley Bank be shared via company social media activity. For the purposes of this guideline, "Confidential Information" is defined in Mission Valley Bank's Employee Handbook, under Confidential Information.

Negative Behavior: Do not engage in negative behavior or name calling of Mission Valley Bank and/or our current, former and potential employees, customers, partners and competitors via social media activity as it will reflect negatively on Mission Valley Bank's reputation.

Misrepresentation of Mission Valley Bank: Do not use unfounded or derogatory statements or misrepresentations of Mission Valley Bank. Copyrighted materials may not be used without permission.

Accuracy: Write knowledgeably, accurately and using appropriate professionalism.

Team Member Privacy: Seek the permission of our team members before writing about or displaying internal company events that might be a breach of their privacy and confidentiality.



Liability: Recognize that you may be personally legally liable for anything you post online if done without the appropriate authorization under this Policy. Staff members can be disciplined by Mission Valley Bank or personally sued by individuals for commentary, content or images that are defamatory, pornographic, proprietary, harassing, libelous, discriminatory, retaliatory or that can create a hostile work environment.

Media Inquiries: Do not respond directly to media inquiries. All media inquiries should be directed to the Vice President Marketing Manager or the President.

Asset Inquiries: Do not respond directly to logo, images (headshots, branch images, social media graphics, print media graphics) or asset inquiries. All asset inquiries should be directed to the Vice President Marketing Manager or the President.

Respect Diversity: Respect differences, appreciate the diversity of opinions and always speak or conduct yourself in a professional manner.

Violations of Guidelines: If a team member notices any violation, it should be reported to the Vice President Marketing Manager and / or Senior Management.

SOCIAL MEDIA POLICY (CONTINUED)

Social Media Administration: Mission Valley Bank's social media platforms will include Facebook, Instagram, X, YouTube, Pinterest, TikTok, Google+ and LinkedIn. All platforms are included in the guidelines of this policy.

Approved Social Media Activities/Postings

The Vice President Marketing Manager is responsible for developing Mission Valley Bank's social media strategy in coordination and with the direction of the Executive Committee and Senior Management team.

Mission Valley Bank will not "censor" comments made by third parties and only removes comments if they are considered obscene, pornographic or similarly inappropriate. It is Mission Valley Bank's policy to remain as transparent as possible. The Vice President Marketing Manager is responsible for monitoring content on an ongoing basis.

Management and Monitoring

1. The Vice President Marketing Manager or an assignee, is responsible for managing Mission Valley Bank's Social Media accounts and blogs. All posts to social media and their related approval(s) will be documented and retained for a period of no less than 3 years.
2. Mission Valley Bank utilizes Google Alerts, Social Assurance, and other tools to monitor conversations in social media and on websites that may affect Mission Valley Bank. All published posts are archived in Mission Valley Bank's Marketing Binder and delivered to the Compliance Officer for archiving and audit purposes on an annual basis.
3. Complaints or issues received via social media must be immediately delivered to the Compliance Officer. These comments will be saved, filed and responded to in the same manner as all other complaints. The compliance officer is responsible for determining appropriate action for any complaints, if any.
4. Disputes will be handled according to the applicable rules and regulations. Any posts considered obscene, pornographic or similarly inappropriate will be removed by an authorized user.
5. Mission Valley Bank and its employees or contractors will not use social media sites as a medium for debt collection, as a basis for making decisions on credit, or to collect information about an applicant's race, color, religion, national origin or sex.
6. Mission Valley Bank will terminate its relationship with certain social media sites if that avenue is deemed inappropriate due to relevancy, stability or regulatory guidance.

