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Accounting and Auditing Matters Policy

Revised August 2019

Approval by Board of Directors:
October 23, 2019

Policy Owners:

Len E. Williams
Chief Executive Officer

Mark K. Olson
Chief Financial Officer

ALTABANCORP
POLICY REGARDING ACCOUNTING AND AUDITING MATTERS

Board Approved October 23, 2019

Policy and Purpose

Altabancorp (“Company”) is committed to the honest and accurate reporting of its financial results and related information in compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. In furtherance of this commitment, the Company has adopted this policy to encourage the confidential and, if desired, anonymous submission by its employees of any concerns they may have regarding questionable accounting or auditing matters, and to facilitate the receipt, retention, and treatment of complaints received regarding accounting, internal accounting controls, or auditing matters. The Company’s Audit and Compliance Committee oversees the treatment of employee concerns in this area.

In order to ensure its financial integrity, the Company will not tolerate any:

- auditing, reporting, or communication of our financial statements and related information that is conducted in an unethical manner or that does not comply with generally accepted auditing and professional standards;
- reporting or communication of our financial statements and related information that does not fairly present in all material respects our financial condition and results of operations or that is not made in a full, fair, accurate, timely, and understandable way;
- fraud or deliberate error in the preparation, evaluation, review, or audit of any of our financial statements, or in the recording and maintaining of our financial records;
- significant deficiencies or material weaknesses in its internal accounting controls;
- untrue statements of material facts or omissions of material facts in its financial records, financial reports, or audit reports that would render any portion of those records or reports misleading;
- behavior that could constitute securities fraud, mail fraud, bank fraud, or fraud by wire, radio, or television communication; or
- behavior that violates or is intended to violate any rule or regulation of the Securities and Exchange Commission, or any provision of applicable federal or state law relating to fraud against shareholders.

Complaint Procedures

If an employee believes that a violation of this policy has occurred or has a concern regarding questionable accounting or auditing matters, he or she should immediately report the suspected violation or concern, anonymously if desired, by either sending an e-mail to or calling the Chair of the Audit and Compliance Committee or the Chief Audit Executive, or following the instructions on AltaNet under Resources → Feedback & Reporting → Reporting of Accounting/Auditing Irregularities.

It is not sufficient to report a suspected violation of this policy to a co-worker or to any person other than as designated above.

External Complaints

This policy also provides for the receipt, retention, and treatment of complaints from non-employees and other third parties regarding accounting, internal accounting controls, or auditing matters. Any such complaints from non-employees or other third parties must be submitted in writing to the Company's Chief Executive Officer.

Investigation and Treatment of Complaints

Upon receipt of a complaint under this policy, the Audit and Compliance Committee, or an appropriate person designated by the Audit and Compliance Committee, will investigate the complaint and will involve agencies and resources outside the Company if, and, or when such outside involvement appears advisable or necessary. The report and investigation will be kept confidential to the extent consistent with the need for a thorough investigation and response and taking into consideration the Company's disclosure obligations and requirements under law.

Employees who choose to identify themselves in submitting a complaint under this policy should expect to receive some response to the complaint within two weeks after the complaint was made, or as soon thereafter as practicable.

If it is determined that an officer or employee of the Company has violated this policy, the Company will take prompt and appropriate corrective action, including, but not limited to, disciplinary action, up to and possibly including immediate termination of employment. If it is determined that a non-employee (including any director, contractor, subcontractor, or other agent) has violated this policy, we will take prompt and appropriate corrective action, which could include severing the director, contractor, subcontractor, or agency relationship. In either event, the Company will take necessary corrective action reasonably calculated to address and to correct the alleged violation.

Retention of Complaints

The Chair of the Audit and Compliance Committee will retain a log of all complaints, tracking their receipt, investigation, and resolution. A copy of each complaint and its log

will be maintained in a file in a secure location to protect the confidentiality of the complaints.

Any and all complaints and related information received under this policy will be retained in accordance with the Company's document retention policies for a period of seven (7) years from the date of the complaint, or for such longer period of time as may be required by law.

Non-Retaliation

The Company is committed to maintaining an environment in which its employees feel free to report all suspected incidents of inaccurate financial reporting or fraud. The Company also expects all employees to cooperate fully in internal investigations of complaints under this policy. The Company will not allow reprisal or retaliation of any kind against any person who acts in good faith in reporting any conduct which he or she reasonably believes may violate this policy, or against any person who in good faith assists, provides information or participates in an investigation, proceeding, or hearing relating to a complaint about our auditing or financial disclosures, or who files, causes to be filed, testifies, participates, or otherwise assists in such a proceeding against the Company.

Annual Review and Reporting

The Chair of the Audit and Compliance Committee will prepare a quarterly summary report to the Audit and Compliance Committee regarding the complaints received along with their investigation and resolution.

Contact Names and Addresses (as of August 1, 2019)

Position	Name, Address, Phone Number and E-mail
President/Chief Executive Officer	Len Williams 1 East Main Street American Fork, UT 84003 801-642-3998 len.williams@altabancorp.com
Audit and Compliance Committee Chair	R. Brent Anderson 1 East Main Street American Fork, UT 84003 801-642-3998 brent.anderson@altabancorp.com
Member of the Audit and Compliance Committee	Matthew S. Browning 1 East Main Street American Fork, UT 84003 801-642-3998 matt.browning@altabancorp.com
Member of the Audit and Compliance Committee	Douglas H. Swenson 1 East Main Street American Fork, UT 84003 801-642-3998 doug.swenson@altabancorp.com
Chief Audit Executive	Marc Bule 33 East Main Street American Fork, UT 84003 801-642-3132 marc.bule@altabancorp.com