

816 Whistleblowing

Lake City Bank takes all employee complaints seriously including those of discrimination, harassment, unethical conduct, safety violations, and complaints regarding accounting or auditing matters. Any employee of Lakeland Financial Corporation, Lake City Bank, or its subsidiaries may submit a good faith complaint regarding any of these matters to the management of Lake City Bank without fear of dismissal or retaliation of any kind.

A. ACCOUNTING OR AUDITING MATTERS

Lake City Bank is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. Lakeland Financial Corporation's Audit Committee will oversee treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, Lakeland Financial Corporation's Audit Committee has established the following procedures for:

- a. The receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters"); and
- b. The confidential, anonymous submission by employees of concern regarding questionable accounting or auditing matters.

Scope of Matters Covered by These Procedures

These procedures relate to employee complaints relating to any questionable accounting or auditing matters, including, without limitation, the following:

1. Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of Lake City Bank.
2. Fraud or deliberate error in the recording and maintaining of financial records of Lake City Bank.

3. Deficiencies in or noncompliance with Lake City Bank's internal accounting controls.
4. Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, or audit reports of Lake City Bank.
5. Deviation from full and fair reporting of Lake City Bank's financial condition.

Treatment of Complaints

Upon receipt of a complaint, the Vice President, Internal Auditor will:

1. Determine the nature of the complaint and ensure that it is investigated
2. When possible, acknowledge receipt of the complaint to the sender

Complaints relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by the Vice President, Internal Auditor or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.

Lake City Bank will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Accounting Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

B. EMPLOYEE MISCONDUCT, POLICY VIOLATIONS, OR OTHER MATTERS

Employees should report concerns regarding misconduct, discrimination, harassment, unethical behavior, and safety violations without fear of retaliation using the anonymous whistleblower Reporting Options below. Lake City Bank is committed to maintaining a workplace that promotes integrity, accountability, and safety. Reports will be promptly investigated and appropriate remedial action taken as necessary.

C. REPORTING OPTIONS

Employees should report any suspicious behavior they are concerned about, without fear of retaliation. Reports can be made to the following:

- Senior Vice President – Chief Human Resources Officer (Kyra Clark)
- Senior Vice President – Senior Risk Manager (Matt VanDeWielle)
- Senior Vice President – General Counsel (Rick Donovan)
- Vice President- Internal Auditor (Dianne Harris)
- Reports can be made in the following manner:
 - Contacting any of the people listed above in person, by phone, or by email;
 - Making an anonymous report to the external whistleblower hotline through any of these methods;
 - Website – <https://report.syntrio.com/lakecitybank>
 - Telephone – 855-878-3906
 - Email – standard-reports@mitratech.com (must mention company name)

Reporting and Retention of Complaints and Investigations

Vice President, Internal Auditor will maintain a log of all accounting and audit complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Audit Committee. Copies of complaints and such log will be maintained in accordance with Lake City Bank's document retention policy.