



## Whistleblower Policy

Any employee of Access National Corporation and its subsidiaries (the “Company”) may submit a good faith complaint regarding accounting or auditing matters or known or suspected violations of the Access National Corporation Code of Ethics (the “Code of Ethics”) to the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The Access National Corporation Audit Committee (the “Audit Committee”) oversees treatment of employee concerns in this area.

Not only is each employee, officer and director of the Company responsible for his or her own compliance with the Code of Ethics, this group is duty bound to ensure all others follow the Code of Ethics. Compliance is particularly important as it relates to internal controls, accounting and auditing matters.

Each of these constituents is required under this Policy to report any non-compliance with the Code of Ethics by others to their Supervisor, the Human Resources Director or business unit manager. Should the reporting party develop concern the potential violation is not or will not get appropriate attention, then they must next elevate the report of the potential violation to the Audit Committee.

To facilitate the reporting of complaints by employees or others, and in accordance with the Audit Committee Charter, the Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters (“Accounting Matters”) and (2) the confidential, anonymous submission by employees or others of concerns regarding questionable accounting or auditing matters or known or suspected violations of the Code of Ethics.

### Receipt of Complaints or Concerns

- Employees or others with complaints regarding Accounting Matters may report their concerns to the Chair of the Audit Committee using the contact information listed below.
- Employees or others may forward concerns regarding questionable accounting or auditing matters or known or suspected violations of the Code of Ethics on a confidential or anonymous basis to the Chair of the Audit Committee by phone or through email or regular mail:

Mr. Michael G. Anzilotti  
manzilotti@comcast.net  
(703) 626-1872  
13517 Cavaletti Court  
Gainesville, VA 20155

For anonymous complaints or concerns, please use regular mail. The Company, however, encourages employees and others to provide their names so the complaint or concern can be

investigated thoroughly. By law, a good faith complaint or concern can be made without fear of dismissal or retaliation of any kind.

#### Scope of Matters Covered by These Procedures

These procedures relate to complaints or concerns (either referred to below as a “Complaint”) relating to any known or suspected violation of the Code of Ethics or any questionable accounting or auditing matter, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company’s internal accounting controls;
- 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 the Company;
- false statements made to independent auditors; or
- deviation from full and fair reporting of the Company’s financial condition.

#### Treatment of Complaints

- Upon receipt of a Complaint, the Chair of the Audit Committee will, when possible, acknowledge receipt of the complaint to the sender.
- Complaints will be reviewed and investigated under Audit Committee direction and oversight by such persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the greatest extent practicable, consistent with the Company’s legal and other obligations, including the need to conduct an adequate review.
- Prompt and appropriate corrective action and preventative measures will be taken when and as warranted in the judgment of the Audit Committee.
- The Company will not permit retaliation of any kind, including discharge, demotion, suspension, threats, harassment or any other manner of discrimination, against any employee for good faith reporting of Complaints or for participating or assisting in an investigation of Complaints, whether reported to the Company or to a proper government official or agency. Anyone who attempts to retaliate in violation of this policy will be subject to disciplinary action, up to and including dismissal.

#### Reporting and Retention of Complaints and Investigations

- The Chair of the Audit Committee, or his designee, will maintain a log of all Complaints, tracking their receipt, investigation and resolution and shall prepare a quarterly summary report thereof for the Audit Committee. Copies of Complaints and such log will be maintained in accordance with the Company’s document retention policy.

*Approved by the Board of Directors of Access National Corporation: July 26, 2018.*