

## **ACNB CORPORATION & SUBSIDIARIES WHISTLEBLOWER POLICY**

The integrity of the information of ACNB Corporation and its subsidiaries (the “Corporation”) is an essential element in the success of the Corporation. When making decisions, the Board of Directors of the Corporation (the “Board”), shareholders, as well as the financial markets, rely on the Corporation’s information. Therefore, the Corporation must ensure and protect the integrity of its information; accordingly, the Corporation is committed to maintaining a workplace where complaints of questionable activities, or reports of fraudulent information, can be raised free of any discrimination, retaliation or harassment.

The Corporation’s administrative and management practices foster corporate accountability, and, therefore, the Corporation supports the making of disclosures that reveal Grave Misconduct, which is generally conduct that results in a violation of law by the Corporation or in a substantial mismanagement of the corporate resources and, if proven, constitutes a criminal offense or reasonable grounds for dismissal of the person engaging in such conduct.

Therefore, it is the policy of the Corporation to encourage employees to report questionable activities, fraudulent information, or Grave Misconduct when they reasonably believe that such activities or conduct have occurred or are occurring. For the purposes of this Whistleblower Policy, “Grave Misconduct” means conduct that violates the Corporation’s Code of Ethics; adversely affects the honest performance of a director’s, officer’s or employee’s functions; involves performing official functions dishonestly or with inappropriate partiality; amounts to the misuse of information or material acquired in the course of the performance of official functions; or, is a substantial mismanagement of resources.

Employees should report their concerns to Corporation management (on an anonymous basis, if employees so desire), and management will take all reports seriously and will promptly investigate. The Corporation will respond to each report based on the nature and gravity of the reported conduct or circumstances. When the Corporation receives reports of questionable activities, fraudulent information, or Grave Misconduct, the Corporation will correct such matters and, if appropriate, the Corporation will discipline the responsible party(ies).

Accordingly, the Corporation strictly prohibits any discrimination, retaliation or harassment against any person who reports incidents of questionable activities, fraudulent information, or Grave Misconduct based on the person’s reasonable belief that such misconduct occurred or is occurring. The Corporation also strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation as a result of such a report.

### **REPORTING AND INVESTIGATION**

If you have reason to report questionable activities, fraudulent information, or Grave Misconduct, you must immediately report those facts to your immediate supervisor or to ACNB Corporation’s Chief Governance Officer. The Corporation may request that you document your report in writing. Alternatively, you may report your concerns anonymously by providing anonymous documentation to the Chief Governance Officer. If you have reason to believe that parties who will receive your report are involved in the reported matters, you should submit your report to the Audit Committee of the Board (the “Audit Committee”).

If you believe that you have been subject to discrimination, retaliation or harassment for having made a report under this Whistleblower Policy, you must immediately report those facts to your immediate supervisor or the Chief Governance Officer. If for any reason you do not feel comfortable discussing the

matter with your immediate supervisor or the Chief Governance Officer, you should bring the matter to the attention of the supervisor of your immediate supervisor; if you are not comfortable with discussing the matter with any of those individuals, you should bring the matter to the attention of the Audit Committee. It is imperative that you promptly bring the matter to the attention of the Corporation, so that the Corporation may promptly and appropriately investigate and address any concerns of discrimination, retaliation or harassment.

The Corporation will investigate all complaints under this Whistleblower Policy, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. All employees have a duty to cooperate in the investigation of reports of questionable activities, fraudulent information, or Grave Misconduct, as well as discrimination, retaliation or harassment resulting from the reporting or investigation of such matters. In addition, an employee shall be subject to disciplinary action, including termination of employment, if the employee fails to cooperate in an investigation or deliberately provides false information during an investigation. If at the conclusion of its investigation the Corporation determines that a violation of a policy has occurred, the Corporation will take remedial action based on the severity of the offense. This action may include disciplinary action against the accused party, up to and including termination of employment. The Corporation may also seek civil remedies from the accused party and even refer criminal misconduct to law enforcement agencies. The Corporation will also take the necessary actions to prevent any further violations of the policy.

### **DISCRIMINATION, RETALIATION OR HARASSMENT**

The Corporation strictly prohibits any discrimination, retaliation or harassment against any person who reports questionable activities, fraudulent information, or Grave Misconduct based on the reasonable belief that such activity or conduct has occurred or is occurring. The Corporation also strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation of a report of questionable activities, fraudulent information, or Grave Misconduct.

In accordance with its investigation procedures, the Corporation will promptly investigate any complaint that a manager, supervisor or employee is involved in discrimination, retaliation or harassment related to the reporting of questionable activities, fraudulent information, or Grave Misconduct. If a complaint of discrimination, retaliation or harassment is substantiated, the Corporation will take the appropriate disciplinary action, up to and including termination of employment.

### **RETENTION**

All documents related to the reporting, investigation and enforcement of this Whistleblower Policy will be kept in accordance with the Corporation's record retention policy and applicable law.

### **ADDITIONAL ENFORCEMENT INFORMATION**

In addition to the Corporation's internal complaint procedure, there are also state, local, federal and central law enforcement agencies that are authorized to review questionable activities, fraudulent information, or Grave Misconduct. The Corporation has developed its policies and practices to guide the legal and ethical responsibilities of the Corporation's employees, as well as to achieve and maintain the highest business standards. The Corporation views conduct that violates its policies or practices as unacceptable under the terms of employment of the Corporation. A violation of the Corporation's policies or

practices could subject the Corporation and any individual employees involved to civil and criminal penalties; therefore, the Corporation encourages all employees to report questionable activities, fraudulent information, or Grave Misconduct before issues or behavior rise to such a level. Nothing in this policy is intended to prevent an employee from reporting information to the appropriate agency when the employee has reasonable cause to believe that a violation of a state, local, federal or central law enforcement agency statute or regulation has occurred.

### **MODIFICATION**

The Audit Committee or the Board of Directors of the Corporation can modify this policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with state, local, federal or central law enforcement agency regulations and/or accommodate organizational changes within the Corporation.

### **ACKNOWLEDGMENT**

Please sign the following acknowledgment form and return it to Human Resources. This will let the Corporation know that you have received this Whistleblower Policy and are aware of the Corporation's commitment to a work environment free of discrimination, retaliation or harassment for reporting questionable activities, fraudulent information, or Grave Misconduct, as well as your obligations to report such information.

**ACNB CORPORATION & SUBSIDIARIES  
WHISTLEBLOWER POLICY  
ACKNOWLEDGMENT AND AGREEMENT**

This is to acknowledge that I have received a copy of the ACNB Corporation & Subsidiaries Whistleblower Policy. I understand that the integrity of the information of the Corporation is an essential element in the success of the Corporation. I further understand that the Corporation is committed to maintaining a work environment free of discrimination, retaliation or harassment for employees who have raised concerns regarding questionable activities, fraudulent information, or Grave Misconduct, and that the Corporation specifically prohibits discrimination, retaliation or harassment whenever an employee makes a good faith report regarding such concerns. Accordingly, I specifically agree that to the extent I have concerns that I reasonably believe to be related to questionable activities, fraudulent information, Grave Misconduct, or any other violation of the Corporation's policies or practices, I will immediately report such conduct in accordance with the Corporation's Whistleblower Policy.

I understand and agree that to the extent I do not use the procedures outlined in this Whistleblower Policy, the Corporation and its officers and directors shall have the right to presume and rely on the fact that I have no knowledge or concern of any such information or conduct.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Employee Number (as applicable)

\_\_\_\_\_  
Printed Name