

MEDALLION BANK
CODE OF ETHICAL CONDUCT FOR SENIOR FINANCIAL OFFICERS
Effective December 3, 2019

In my role as the principal executive officer, principal financial officer, or principal accounting officer or controller, or a person performing similar functions (collectively, “Senior Financial Officers”) of Medallion Bank (the “Bank”), I hereby state as follows:

I recognize that I hold an important and elevated role in corporate governance. I am uniquely capable and empowered to ensure that shareholders’ interests are appropriately balanced, protected, and preserved. Accordingly, this Code provides principles to which Senior Financial Officers are expected to adhere and advocate. This Code embodies rules regarding individual and peer responsibilities to the Bank, the public, and shareholders.

I certify that I adhere to and advocate the following principles and responsibilities governing my professional and ethical conduct:

1. I act honestly and ethically, including ethically handling actual or apparent conflicts of interest between personal and professional relationships.
2. I act to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the Bank files with, or submits to, the Federal Deposit Insurance Corporation and in other public communications made by the Bank.
3. I comply with applicable governmental laws, rules, and regulations.
4. I act in good faith, responsibly, and with due care and diligence, without misrepresenting material facts or allowing my independent judgment to be impaired.
5. I do not disclose any confidential information acquired in the course of my work, except when authorized or when I am legally obligated to disclose such information. I do not use such confidential information for personal advantage.
6. I comply with the Bank’s Code of Ethical Conduct for all employees.
7. I promptly report to the Chief Compliance Officer any conduct that I believe to be a violation of the law, business ethics, this Code, the Bank’s Code of Ethical Conduct and Insider Trading Policy, including any transaction or relationship that reasonably could be expected to give rise to such a violation, or any other policy of the Bank.
8. I will not retaliate against any other Senior Financial Officer, officer, employee or their affiliated persons for reports of potential violations that are made in good faith.

I understand that violations of this Code of Ethical Conduct for Senior Financial Officers, including failure to report actual or potential violations by others, will be viewed as a severe disciplinary matter that may result in disciplinary action, up to and including termination of employment.

Name:
Title:

Date