

## **Axos Statement of Ethical Principles**

### **Introduction**

To All Axos Team Members:

Axos was born of innovation and a commitment to bring banking into the information age. At the same time, Axos embodies the commitment to ethics and integrity that has guided successful banks for over a century. Our commitment to our shareholders, our customers, the public, and each other is to uphold our values and Axos's reputation. Every Axos Team Member, in the performance of his or her duties, is expected to demonstrate a personal commitment to professional integrity and sound ethical judgment, even when presented with new or unforeseeable situations.

What follows is Axos's Statement of Ethical Principles, which is intended to guide all Team Members and also serve as the foundation for Axos's Master Policy on Ethics and Professional Integrity (the "Master Policy"). These principles are critical to achieving our shared vision of an enterprise committed to business excellence and superior individual performance in a character-driven meritocracy.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory Garrabrants".

Gregory Garrabrants  
Chief Executive Officer

A handwritten signature in black ink, appearing to read "Paul Grinberg".

Paul Grinberg  
Chairman of the Board

## **Axos Statement of Ethical Principles**

### **Scope**

Company's Statement of Ethical Principles (this "Statement") applies to Team Members, including our employees, officers, and Board of Directors.

### **General Compliance**

Team Members are expected to comply with all laws applicable to Company's business, governance, and operations, as well as Company's policies and management directives enacted to support our compliance obligations. Team Members are expected to demonstrate sound judgment in addressing any compliance or ethical question, including seeking guidance from supervisors, Company's Legal Division, or Company's Compliance Department, as appropriate.

Company is committed to maintaining and consistently following written policies and procedures that support Company's compliance obligations and promote Company's culture of compliance, attention to detail, and ethical behavior. Team Members are expected to report to an appropriate manager or Officer any compliance concerns and may do so without fear of retaliation. This reporting obligation represents a fundamental part of each Team Members' compliance responsibility.

### **Conflicts of Interest**

Company recognizes that our core commitment to ethical behavior and maintaining the trust and confidence of our shareholders, our customers, and the public includes the avoidance of Conflicts. Team Members are expected to abide by Company's policies, including, without limitation, the Master Policy. Team Members are expected to support Company's policies to avoid Conflicts by disclosing and reporting potential Conflicts so that Company can ensure that its policies are followed and that Conflicts are avoided. Company also expects Team Members to abide by the provisions of Company's Code of Conduct that address corporate opportunities and the use of Company resources.

### **Disclosure, Accurate Records, and Reporting**

Company complies with disclosure and reporting requirements under Applicable Law, and expects Team Members to support Company's objectives with their diligence, attention to detail, and compliance with record-keeping requirements. Company recognizes the importance of accurate reporting in upholding Company's reputation and maintaining the trust we share with our shareholders, our customers, and the public.

## **Confidential Information**

Normal banking operations involve working with confidential and other sensitive information, including Company's own information. Team Members are expected to adhere to Applicable Law regarding confidential information, including, without limitation, laws protecting non-public personal information and securities laws. Team Members are expected to abide by all Company policies protecting confidential information and prohibiting the inappropriate use thereof, including, without limitation, the provisions of the Master Policy prohibiting insider trading.

## **Waivers**

Company intends that this Statement inspire and guide our policies and conduct. Waivers made in relation to this Statement may only be granted pursuant to the procedures provided in the Master Policy, and Company shall make required disclosures related to any Waiver.

## **Behavior Inconsistent with this Statement**

Team Members are expected to comport themselves consistent with this Statement and Company's policies. The capitalized terms used in this Statement, except as defined herein, have the meaning ascribed to them in the Master Policy. Team Members are expected to understand and follow the Master Policy, including, without limitation, in their efforts to comport themselves consistent with this Statement. Behavior inconsistent with this Statement may subject Team Members to disciplinary actions, and any suspected conduct that violates this Statement should be reported to the Designated Officer.

## **Cyclical Reviews**

Company is committed to reviewing and revising its policies and procedures as necessary to respond to new regulations and business needs, as well as to promote our ethical culture.