

QCRH Anti-Bribery Policy

Effective Date:	October 2003
Last Modified:	August 2017
Approved By:	QCRH Board of Directors (upon recommendation of Nominations and Governance Committee) then adopted by each entity
Date Approved:	August 2019
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Contact Person/Officer:	QCRH Senior Legal Counsel

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PURPOSE

All employees, officers, directors, and agents (“Company Officials”) of QCR Holdings, Inc., and its subsidiaries (the “Company”) are expected and required to act in a responsible and respectable manner at all times. Furthermore, Company Officials must remain free of outside influence that could result in the loss of objectivity regarding business conducted with Company customers or with the Company itself.

SCOPE AND RESPONSIBILITIES

The Board of Directors adopts this Anti-Bribery Policy in accordance with the Bank Bribery Act to govern the disclosure of potential conflicts of interest and to prevent the development of improper relationships between Company Officials and Company customers.

Annual Certification

Each Company Official annually will receive a copy of this policy and will be required to sign a written acknowledgement of its receipt and an agreement to comply with its terms.

POLICY AND PRACTICES

General Prohibitions

The Bank Bribery Act generally prohibits Company Officials: (i) from soliciting for themselves or for a third party (other than the Company itself) anything of value from anyone in return for any business, service or confidential information of the Company; and (ii) from accepting anything of value (other than bona fide salary, wages and fees) from anyone in connection with the business of the Company, either before or after a transaction is discussed or consummated. In addition, Company Officials may not self-deal or otherwise trade on their positions with the Company or accept from someone doing or seeking to do business with the Company a business opportunity not available to other persons or that is made available because of such Company Official's position with the Company.

Required Disclosures

All Company Officials must provide a written disclosure of any potential conflict of interest. These potential conflicts would include, but are not limited to, the following:

- Management positions, such as directorships, held at outside organizations;
- Related interests, such as a company or political campaign controlled by that Company Official, or the funds or services of which will benefit that Company Official; and
- Any compensation (including salaries, wages or gifts) received from organizations other than the Company.

Where applicable, notification may also be required under the terms of the Company's Related Party Transactions Policy, a copy of which is available on the Company's Intranet, QNews.

It is the responsibility of each Company Official to be aware of any actual, potential or perceived conflict of interest and to remove himself/herself from any compromising position regarding the Company and any individuals or organizations with which a Company Official may be connected.

Acceptance of Gifts

Company Officials may accept small gifts or other items of value from an individual or entity as long as they are properly disclosed and the dollar value is considered nominal. For purposes of this policy, gifts from an individual or entity and any related individuals or entities should be aggregated for reporting purposes.

Individual gifts valued up to \$50 may be accepted by Company Officials without reporting. Individual gifts exceeding \$50 must be reported to, and receive the approval of, the Company's Senior Vice President, Chief Risk Officer or his/her designate. Gifts received from an individual or entity (and all related individuals and entities) that, in the aggregate, exceed \$100 in any 12-month period, must be reported to the Company's Senior Vice President, Chief Risk Officer. In no event may any Company Official receive gifts from any individual or entity that, when aggregated with any gifts from related individuals and entities, exceed \$250 in any one calendar year. Moreover, in no event may any Company Officials accept cash or checks regardless of the amount.

The following are examples of the types of gifts that Company Officials may accept from individuals or companies doing or seeking to do business with the Company:

- Gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those between the parents, children or spouse of a Company Official) where the circumstances make it clear that it is those relationships rather than the business of the Company that are the motivating factors.
- Meals, refreshments, entertainment, accommodations or travel arrangements, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the Company as a reasonable business expense if not paid for by another party.
- Acceptance of loans from other banks or financial institutions on customary terms to finance proper and usual activities of Company Officials, such as home mortgage loans, except where prohibited by law (Company Officials should refer to the Company's Senior Vice President, Chief Risk Officer for additional guidance and regulatory requirements concerning loans from correspondent banks).
- Advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars and similar items.
- Discounts or rebates on merchandise or services that do not exceed those available to other customers.
- Gifts of reasonable value that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, holiday or birthday.
- Civic, charitable, educational, or religious organization awards for recognition of service and accomplishment.

On a case by case basis, the Company may approve of other circumstances, not identified above, in which a Company Official may accept something of value in connection with Company business, provided that such approval is made in writing on the basis of a full written disclosure of all relevant facts and is otherwise consistent with the Bank Bribery Act.

Recordkeeping

The Company will maintain contemporaneous written reports of any disclosures made by Company Officials in connection with this policy.

REGULATORY REFERENCE

Bank Bribery Act

RELATED POLICIES AND PROCEDURES

QCRH Employee Handbook

QCRH Code of Conduct

QCRH Related Party Transaction Policy

RENEWAL/REVIEW

Each entity's Board of Directors should review and approve this policy annually.

Modification History

Date:	Details:
October 2003	Policy created
9/16/2010	Converted policy to use current template
7/25/2012	Updated titles
8/3/2015	Removed reference to attorneys
8/24/2016	Updated Contact Person
8/24/2017	Added a reference to the QCRH Related Party Transactions Policy adopted February 2017
July 2019	Title updates