

## HOMESTREET, INC.

### WHISTLEBLOWER POLICY: REPORTING POTENTIAL MISCONDUCT

*Effective April 26, 2011  
Amended March 30, 2017*

*Last Annual Review: March 2, 2018*

#### I. INTRODUCTION

HomeStreet, Inc. (HomeStreet, Inc. and its subsidiaries, collectively, referred to herein as the "Company") expects directors, officers and employees to observe high standards of business and personal ethics in performing their duties and responsibilities on behalf of the Company and to comply with all applicable laws, regulations and Company policies. The underlying purpose of this policy (the "Policy") is to further the Company's goal of legal and ethical compliance. The support of all directors, management, and employees is important in achieving this goal. Unless supplanted by other applicable law, this policy sets forth procedures for directors, officers and employees to (i) raise questions and concerns about potential misconduct, including potential violations of law, regulation or Company policies and (ii) report potential misconduct.

#### II. RAISING QUESTIONS AND REPORTING

*Encouragement of Reporting.* The Company encourages complaints, reports or inquiries about illegal practices or violations of the Company's policies, including illegal or improper conduct by the Company itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which the Company has existing complaint mechanisms should be addressed under those mechanisms identified in the Company's employee handbook or other Company policies, such as raising matters of alleged discrimination or harassment via the Company's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

*Confidentiality.* The Company will treat all communications under this policy in a confidential manner, except to the extent necessary (i) to conduct a complete and fair investigation or (ii) for review of Company operations by the Board of Directors, its Audit Committee, any special committee or sub-committee of the Board or Audit Committee to whom authority for such review has been delegated, the Company's independent public accountants or the Company's internal or outside legal counsel.

*How to Raise Questions and Report Potential Misconduct.* If an individual believes that a violation of law, regulation or Company policy may have occurred, the individual should, as a first step, share questions or concerns with, and report potential misconduct to, someone who can help address the issue. To do so:

- *Employees* should contact their supervisors. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with the response received, the individual should speak with the General Counsel or anyone in management the individual feels comfortable approaching.
- *Officers* should contact the Company's General Counsel.
- *Directors* should contact the Chairperson of the Board.

*Financial and Accounting Matters.* If a concern or potential misconduct relates to the Company's finances, accounting or auditing practices or internal financial controls, individuals may also contact the Chief Financial Officer of the Company and/or the Chairperson of the Audit Committee. However, nothing in this Policy is intended to impede the ability of any individual to report an alleged violation of securities laws or regulations directly to the Securities and Exchange Commission.

*Securities Matters.* If a concern or potential misconduct relates to an alleged violation of securities laws or regulations by the Company, its directors, officers, agents or employees, individuals should contact the General Counsel of the Company directly and/or the Chairperson of the Audit Committee. However, nothing in this Policy is intended to impede the ability of any individual to report an alleged violation of securities laws or regulations directly to the Securities and Exchange Commission.

*Confidential and Anonymous Reporting.* Individuals can also report concerns and potential misconduct confidentially and anonymously. Individuals must recognize that the Company may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously. To make a confidential, anonymous report, individuals should make a report at EthicsPoint by going to [www.homestreet.ethicspoint.com](http://www.homestreet.ethicspoint.com) or by calling toll-free to 855-372-0658.

### **III. PROTECTION AGAINST RETALIATION**

The Company is committed to maintaining an environment where individuals feel free to raise questions and concerns in good faith. The Company adheres to a strict policy that prohibits taking or threatening disciplinary or other retaliatory action, including but not limited to discharge, demotion, suspension, harassment or any other discrimination, against an individual for raising questions or concerns about, or reporting, potential misconduct, including a potential violation of law, regulation or Company policy that the individual reasonably believes exists. This protection extends to those whose allegations are made in good faith, as well as reports of alleged

accounting irregularities or securities violations to the Securities and Exchange Commission or anything else covered by Section 806 of the Sarbanes Oxley Act of 2002 (18 U.S.C. § 1514A), the Dodd-Frank Act, or other applicable law, even if such allegations are determined to be mistaken, though not to serial complaints without merit. In addition, the Company will not retaliate against an individual who assists in the investigation of potential misconduct. Any officer or employee who engages in retaliation may be subject to appropriate disciplinary action, up to and including termination. A Director who engages in retaliation may be subject to action as determined by the Board. This Policy is intended to encourage and enable employees and others to raise serious concerns within the Company prior to seeking resolution outside the Company, however, it does not prohibit reporting alleged accounting irregularities or securities violations, or anything else covered by the Sarbanes-Oxley Act, the Dodd-Frank Act, or other applicable law directly to the Securities and Exchange Commission whether or not an initial report has been made internally. The Company reserves the right to discipline persons who make bad faith, knowingly false or vexatious complaints, reports or inquiries, or who otherwise abuse this policy.

#### **IV. HANDLING OF REPORTED CONCERNS OR COMPLAINTS**

Reports of suspected violations of law, regulation or Company policies and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The General Counsel will conduct or designate other internal or external parties to conduct the investigations. The investigating parties may notify the concerned individuals of their findings directly and prepare other reports as indicated by the circumstances. A summary of all such reports will be presented to the Audit Committee of the Board of Directors.

In the event that a report of a suspected violation of law, regulation or Company policy or a report of retaliation involves the General Counsel or any staff who report directly to the General Counsel, that officer or staff member will not participate in the investigation and the remaining officers or their designees will conduct the investigation.