

**Pinnacle Bank
Consumer Complaint Policy**

**Approved by the Compliance Committee
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Pinnacle Bank

Consumer Complaint Policy

I. Statement of Policy

It is the policy of Pinnacle to provide a mechanism by which all consumer complaints are given prompt, courteous, and fair attention. All offices and departments of the firm are expected to handle complaints with care and to resolve these matters promptly and, when applicable, within regulatory requirements.

II. Summary

Pinnacle will adhere to all complaint procedures as prescribed by regulations. When not prescribed, we will use our resources to investigate and satisfy all complaints in a timely manner. All complaints will be recorded through one central point, either after it is resolved or for the resolution process.

Complaints may come in many forms. They may be oral or in writing from such sources as Facebook, Twitter, email, letter, or a regulatory agency. For the purpose of this policy, a complaint is defined as any verbal, written or electronic statement which expresses dissatisfaction with a bank product, policy, service, or associate, including a particular act or practice of the bank that is perceived by the consumer to be unfair, deceptive or abusive, or in violation of a regulation under which the bank must operate. The following types of consumer complaints should be reported in the Consumer Complaint System:

- All complaints where a consumer states that he or she wishes to file a complaint;
- All complaints in which a consumer states a bank practice or associate interaction was misleading;
- All complaints alleging discrimination by the bank;
- All complaints that address the bank's CRA performance;
- All complaints in which the consumer threatens to file suit against the bank;
- All letters of complaint sent by an attorney on behalf of a bank client;
- All complaints which allege violation of a specific law or regulation or question the legality of a policy or procedure; and
- All complaints made via organizations such as the Better Business Bureau, a bank regulatory agency (regulator) or any government agency.

A complaint should be differentiated from business as usual client issues. Neither routine requests for assistance or account inquiries, nor nonspecific expressions of negative feelings are considered complaints.

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The following errors do not need to be reported as consumer complaints unless the complaint involves the process or the way these types of services were handled:

- Error Resolution claims under Regulation E
- Error Resolution claims under Regulation Z
- Qualified written requests under RESPA
- Credit report error claims under FCRA

If it is questionable whether a particular complaint meets this definition, the complaint should be handled through the Consumer Complaint System.

III. Authority and Responsibility

It is the collective and individual responsibility of the Board of Directors to ensure that Pinnacle responds to all complaints in a timely and effective manner. The Risk Committee, a designated Committee of the Board of Directors, will demonstrate oversight by receiving quarterly reports from the Chief Compliance Officer summarizing any trends identified.

Pinnacle's Leadership Team and lines of management are tasked with ensuring compliance with the policy provisions to ensure that complaints are handled appropriately and in accordance with internal procedures and, if applicable, consumer regulations. All complaints will be reviewed on a regular basis for potential service and compliance deficiencies or concentration in a particular area. The Chief Compliance Officer (CCO) is responsible for monitoring resolution procedures and implementing corrective actions as necessary. All associates are expected to adhere to the requirements of the policy.

IV. Associate Training

All associates are trained on the Consumer Complaint System when hired. It is the responsibility of each Manager to provide ongoing training for appropriate staff and respective department procedures.

V. Record Retention

Business units will be responsible for maintaining a record file of client communication and supporting documentation. In addition, all complaints that address the bank's CRA performance will be retained by the CRA Officer in the bank's Public File.