

Anonymous Reporting Line (Whistleblower Reporting Line)

Policy Statement

Berkshire Hills Bancorp, Inc., and all direct and indirect subsidiaries, (collectively, the "Company") have adopted a Code of Business Conduct (the "Code") which formally sets forth the ethical standards which are expected of each of us - employees, officers and directors - in our dealings with each other and on behalf of the Company. This Code also gives instructions on how, and to whom, suspected violations of the Code can be reported anonymously.

As employees or member of Berkshire's board of directors, you are obligated to comply with the Code of Business Conduct and to speak up when you suspect or witness a potential violation of the Code or other wrongdoing, including fraud or embezzlement, or any questionable, unethical, or suspicious accounting or auditing matters. Fraud is any act of deception intended to result in financial gain for the perpetrator or financial loss to another person or company. All fraud or suspected fraud must be reported immediately for further investigation. Although it is preferable to report any fraud or suspected fraud to the SEVP of the business unit and the FIU, fraud can also be reported to the General Counsel or reported through the anonymous reporting line. The anonymous reporting line enables employees to make a report using any of the following means 365 days a year.

The Anonymous Reporting Line policy establishes the standards and procedures to ensure that handling of any complaint related to violations of the Code, any wrongdoing, including fraud or embezzlement, or any questionable, unethical, or suspicious accounting or auditing matters complies with management's and the audit committee's objectives. The policy and procedures established facilitate access for employees and related parties to reach the audit committee and applies to all offices and subsidiaries of the Company.

Additionally, Berkshire is required by law to develop and maintain systems of internal accounting controls. This ensures that the preparation of financial statements, reports and accounts are prepared in accordance with all applicable laws, rules, and accounting principles. If your concern involves a questionable accounting or auditing matter and you wish to report the issue independently and anonymously, you are encouraged to promptly report all such complaints or concerns through the independent third-party 24-hour hotline and website available every day of the year that will provide for the anonymous reporting of any such complaints and concerns. Failure to report violations may lead to disciplinary action, including termination of your employment and legal action.

New employees shall either receive a printed copy or be directed to review an electronic version of the Code of Business Conduct upon hire. This information will also be provided annually and all employees must promptly acknowledge their receipt of the Code of Business Conduct and Anonymous Reporting Line Policy.

PROCEDURES FOR MAKING ANONYMOUS REPORTS, ALLEGATIONS, or COMPLAINTS

In addition to any other avenue available to an employee, any employee or board member may report any allegation to the audit committee openly, confidentially or anonymously. Such reports can be made anonymously 365 days a year:

1. Toll-free independent hotline: **1-866-921-6714** at any time. The toll-free line is managed by an outside, independent service provider and allows anyone to make a report without divulging his or her name. This service is available 24/7.
2. Independent Hotline Fax at **1-604-926-5668** at any time. This service is available 24/7 and anonymous.
3. Independent Website/ Portal Case Management: Integrity Counts Ethics Reporting Portal- <https://www.integritycounts.ca/org/BHLB> at any time. This service is available 24/7. You will be provided with a unique user login and password which will allow you to log or communicate information related to your complaint. You will have the option to remain anonymous.

Audit Committee Responsibilities

All reports received by the independent third party will be logged and communicated to the audit committee chairman or other audit committee designee, through a secure portal. The chairman will review the report and has the opportunity to post questions or comments to the employee to gather more information. They also have the ability to post comments and provide an update on actions. The secure portal provides a neutral platform whereby the audit committee chairman and the whistleblower can communicate to resolve an incident without exposing the whistleblower's identity if they prefer to remain anonymous.

If deemed necessary and appropriate, the chairman or designee may seek the assistance of the internal audit department and may also engage legal counsel or other assistance in conducting the review or investigation.

The audit committee shall receive, retain, investigate and act on complaints and concerns of employees regarding violations of the Code, or questionable accounting, internal controls and auditing matters. This includes matters regarding the circumvention or attempted circumvention of internal accounting controls or processes that would otherwise constitute a violation of the Company's policies.

The audit committee will conduct its investigation of the anonymous report expeditiously and upon completion of its investigation will provide a

summary to the board of directors.

The board of directors may direct any appropriate executive officer of the Company to carry out the board's final response to a whistleblower report as applicable including, but not limited to, administering any internal corrective action and making any appropriate regulatory disclosures required by law.

Audit Committee Approval Date

11/7/2019

BHLB Board of Directors Approval Date

12/12/2019