



# POLICY

## **AUDIT AND NON-AUDIT SERVICES PRE-APPROVAL POLICY**

# NORTHEAST COMMUNITY BANCORP, INC.

## AUDIT COMMITTEE

### AUDIT AND NON-AUDIT SERVICES PRE-APPROVAL POLICY

(Effective March 3, 2021)

#### I. Statement of Principles

Under the Sarbanes-Oxley Act of 2002 (the “SOX Act”), and the rules of the Securities and Exchange Commission (the “SEC”), the Audit Committee of the Board of Directors of NorthEast Community Bancorp, Inc. (the “Company”) is responsible for the appointment, compensation and oversight of the work of the Company’s independent registered public accounting firm (the “Audit Firm”). As used herein the “Company” refers to NorthEast Community Bancorp, Inc. and its affiliated companies and consolidated subsidiaries.

As part of its responsibility, the Audit Committee is required to pre-approve the audit and non-audit services performed by the Audit Firm in order to assure that they do not impair the Audit Firm’s independence from the Company. To implement the provisions of the SOX Act, the SEC has issued rules specifying the types of services that an independent auditor may not provide to its audit client and governing the Audit Committee’s administration of the engagement of the independent auditor. Accordingly, the Audit Committee is adopting this Audit and Non-Audit Services Pre-Approval Policy (the “Policy”), which sets forth the procedures and the conditions pursuant to which services to be performed by the Audit Firm are to be pre-approved.

In approving all services performed by the Audit Firm, the Audit Committee will consider whether such services are consistent with the SEC’s rules on auditor independence. The Audit Committee will also consider whether the Audit Firm is best positioned to provide the most effective and efficient service, for reasons such as its familiarity with the Company’s business, people, culture, accounting systems, risk profile and other factors. All such factors will be considered as a whole, and no one factor should necessarily be determinative.

The appendices to this Policy describe the audit, audit-related, and tax services that have pre-approval of the Audit Committee. The term of any pre-approval is twelve (12) months from the date of pre-approval, unless the Audit Committee considers a different period and states otherwise. The Audit Committee will annually review and pre-approve the services that may be provided by the Audit Firm. The Audit Committee may add or subtract to the list of pre-approved services from time to time, based on subsequent determinations.

#### II. Delegation

As provided in the SOX Act and the SEC’s rules, the Audit Committee may delegate pre-approval authority to its chairperson or any other Audit Committee member or members. The member to whom such authority is delegated should report, for informational purposes only, any pre-approval decisions to the Audit Committee at its next meeting. The Audit Committee will not delegate to management the Audit Committee’s responsibilities to pre-approve services performed by the Audit Firm.

### III. Audit Services

The Audit Committee will pre-approve all annual audit services engagement terms and fees. The Audit Committee will monitor the audit services engagement throughout the year and also will approve, if necessary, any changes in terms and conditions resulting from changes in audit scope, Company structure or other items. The Audit Committee will request that the audit engagement letter with the Audit Firm be addressed to the Chairman of the Audit Committee and that the Chairman of the Audit Committee execute the engagement letter on behalf of the Company. The Audit Committee has pre-approved the audit services listed in Appendix A. All audit services not listed in Appendix A must be separately pre-approved the Audit Committee.

### IV. Audit-Related Services

Audit-related services are services that are reasonably related to the performance of the audit or review of the Company's financial statements. Because the Audit Committee believes that the provision of audit-related services does not impair the independence of the Audit Firm and is consistent with the SEC's rules on auditor independence, the Audit Committee has pre-approved the audit-related services listed in Appendix B. All audit-related services not listed in Appendix B must be separately pre-approved by the Audit Committee.

### V. Tax Services

The Audit Committee believes that the Audit Firm can provide tax services such as tax compliance, tax planning and tax advice without impairing its independence and has pre-approved the tax services listed in Appendix C. All tax services not listed in Appendix C must be separately pre-approved by the Audit Committee.

### VI. Pre-Approval Fee Levels or Budgeted Amounts

Pre-approval fee levels or budgeted amounts for all services to be provided by the Audit Firm will be established annually by the Audit Committee. Any proposed services exceeding these levels or amounts will require specific pre-approval by the Audit Committee. In addition, any service estimated to exceed \$15,000 will require specific pre-approval. The Audit Committee is mindful of the overall relationship of fees for audit and non-audit services in determining whether to pre-approve any such services.

### VII. Procedures

Requests to provide services that require separate approval by the Audit Committee will be submitted to the Audit Committee by both the Audit Firm and the Company's Chief Financial Officer (or the person acting in the capacity of the Chief Financial Officer), and must include a joint statement as to whether, in their view, the request or application is consistent with the SEC's rules on auditor independence. A discussion and approval of the service will be included on the agenda for the next regularly scheduled Audit Committee meeting. If the timing for the service needs to commence before the next Audit Committee meeting, a special meeting of the Audit Committee may be called or the chairman of the Audit Committee, or any other member of the Audit Committee designated by the Audit Committee, can provide specific pre-approval.

Once the Audit Committee has given pre-approval for services to be performed by the Audit Firm, the appropriate Company officer may engage the Audit Firm and execute any necessary document for the performance of non-audit services within the scope of the pre-approval.

On a quarterly basis, the Chief Financial Officer, (or the person acting in the capacity of the Chief Financial Officer) will provide to the Audit Committee a summary of fees paid to the Audit Firm.

## Appendix A

### Pre-Approved Audit Services for Fiscal Years 2021 and 2022

1. Annual financial statement audit (including required quarterly reviews) and other procedures required to be performed by the Audit Firm to be able to form an opinion on the Company's consolidated financial statements.
2. Financial audits for subsidiaries or affiliates of the Company.
3. The attestation engagement for the Audit Firm's report on management's assertion on internal controls for financial reporting.
4. Services associated with SEC registration statements, periodic reports and other documents filed with the SEC or other documents issued in connection with securities offerings (e.g., comfort letters, consents), and assistance in responding to SEC comment letters.
5. Consultations by the Company's management as to the accounting or disclosure treatment of transactions or events and/or the actual or potential impact of final or proposed rules, standards or interpretations by the SEC, FASB, PCAOB or other regulatory or standard setting bodies.

## Appendix B

### Pre-Approved Audit Related Services for Fiscal Years 2021 and 2022

1. Due diligence services pertaining to potential business acquisitions/dispositions.
2. Financial statement audits of employee benefit plans.
3. Internal control reviews and assistance with internal control reporting requirements.
4. Consultations by the Company's management as to the accounting or disclosure treatment of transactions or events and/or the actual or potential impact of final or proposed rules, standards or interpretations by the SEC, FASB, PCAOB or other regulatory or standard-setting bodies.
5. Attest services not required by statute or regulation.

## Appendix C

### Pre-Approved Tax Services for Fiscal Years 2021 and 2022

1. U.S. federal, state and local tax planning and advice, including advice related to potential business acquisitions/dispositions.
2. U.S. federal, state and local tax compliance, including preparation of, and representation in connection with, advisory ruling requests to regulatory authorities.
3. Preparation and/or review of original and amended federal, state and local income, franchise, payroll, property and other tax returns, including assistance in, and representation before regulatory authorities in connection with, the examination of such returns and claims for refunds.