

**Chain Bridge Bancorp, Inc.
and Chain Bridge Bank, N.A.
Non-Employee Director
Stock Ownership Policy**

Adopted by Chain Bridge Bancorp, Inc.
and Chain Bridge Bank, N.A. Boards on July 11, 2023

Chain Bridge Bancorp, Inc. and Chain Bridge Bank, N.A. Non-Employee Director Stock Ownership Policy

Purpose and Scope

This policy sets forth the stock ownership requirements for Non-Employee Directors (hereafter "Directors") of both Chain Bridge Bancorp, Inc. (the "Company") and its subsidiary, Chain Bridge Bank, N.A. (the "Bank"). The aim of this policy is to align the Directors' interests with the interests of the Company's shareholders.

Policy

Minimum Ownership Requirement:

Each Director of the Company and the Bank is required to own a quantity of the Company's common stock equivalent to five times the cash retainer portion of a Bank Director's annual compensation. The value of the ownership requirement will be reviewed and adjusted annually, if necessary, in line with any changes to the Bank Director's cash retainer within the year. The current annual cash retainer for Bank Directors is \$10,000, requiring Directors to own five times that amount or \$50,000 worth of shares.

Valuation:

The value of the shares for the purpose of this policy will be calculated using the most recent independent valuation of the Company's shares, or if the Company is publicly traded on a stock exchange, at the most recent trading price of the Company's shares. The Governance Committee will assess each Director's compliance with this Policy at the end of the first quarter of each calendar year.

Shares Counted:

The shares eligible for this requirement include those directly owned by the Director, such as shares registered in the Director's name, either individually or jointly with a spouse. Shares held in Individual Retirement Accounts (IRAs) or via trusts where the Director is the beneficial owner are also included in this requirement.

Conversely, shares held in a trust where the Director functions solely as a trustee and is not a beneficial owner will not count towards this requirement. Similarly, shares indirectly held through limited partnerships, corporations, and LLCs are excluded from this requirement.

Grace Period:

Newly appointed Directors will have a three-year grace period from the date of their appointment to acquire the necessary shares. Existing Directors will have a three-year grace period from the date of adoption of this policy. Extensions to this grace period may be granted on a case-by-case basis, considering extenuating circumstances, such as market downturns or personal financial hardships.

Compliance:

The Company's Governance and Nominating Committee will monitor compliance with this policy on an annual basis and shall measure compliance at the end of the first quarter of each calendar year. In case a Director fails to meet the requirement after the expiration of the grace period, the Director may be asked not to stand for re-election to the board of the relevant entity. If a Director falls out of compliance during a term, the Committee will consider the circumstances and may, in its discretion, provide a reasonable period for the Director to regain compliance. Details of any instances of non-compliance and the Committee's subsequent response will be properly documented and communicated.

Superseding Clause:

This Non-Employee Director Stock Ownership Policy supersedes any and all previous policies or requirements regarding share ownership for Directors of Chain Bridge Bancorp, Inc. and Chain Bridge Bank, N.A. As of the approval and adoption date, this policy constitutes the official and governing document for Director share ownership requirements within both the Company and the Bank. Any previous directives, policies, or practices concerning the same subject matter are hereby rescinded and replaced in their entirety by this policy. All Directors are expected to comply with this policy henceforth.

Approval and Communication:

This policy has been approved and adopted by the Board of Directors of Chain Bridge Bancorp, Inc. and Chain Bridge Bank, N.A. on this 11th day of July, 2023. The policy will be reviewed annually or as needed. It will be publicly available and posted under the Investor Relations section of the Company's website for transparency with our shareholders and the broader public.