CODE OF BUSINESS CONDUCT AND ETHICS

I. OVERVIEW

The Board of Directors (the "***Board***") of Amalgamated Financial Corp. (the "***Company***") has adopted the following Code of Business Conduct and Ethics (the "***Code***" or "***Code of Ethics***"). References to the Company in this Code also include Amalgamated Bank (the "***Bank***") and all other subsidiaries of the Company and the Bank, and references to the Board include the Board of Directors of the Company, the Bank and each other subsidiary. It should be noted that wherever a singular expression is used in this Code of Business Conduct and Ethics, that expression is considered as including the plural where required by the context and where appropriate.

II. AT-WILL EMPLOYMENT

All employment with the Company is "at will." This means your employment can be terminated at any time by you or the Company for any reason, with or without prior notice, other than an illegal reason, except as otherwise provided by law or the current collective bargaining agreement, if applicable, between the Company and the union representing certain employees (the "***CBA***"). The Code contains guidelines only. It is not a contract of employment. No representative of the Company may enter into any agreement or make any representation, written or oral, to alter your at-will status or otherwise create any contractual obligation to you unless the agreement is in writing, is signed by the Chief Executive Officer, and specifically states that it is altering your at-will status and/or is a duly negotiated and executed collective bargaining agreement.

III. POLICY OVERVIEW

Integrity, honesty, sincerity, fairness, and respect: these words represent more than just the aspirations of the Board and Management of the Company. They are part of the foundation of the Company's strong history of moral, ethical and social responsibility. They are principles for performance, which — combined with our efforts to provide high standards for products and services — have helped build the Company's reputation among the communities and customers it serves.

The Board has adopted the Code in order to promote and ensure:

- honest and ethical conduct, including fair dealing and the ethical handling of conflicts of interest;
- full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "***SEC***"), Federal Reserve Board (the "***Fed***"), Federal Deposit Insurance Corporation (the "***FDIC***"),
- New York State Department of Financial Services ("***NYDFS***") and other regulators, and in other public communications made by the Company;
- compliance with applicable governmental laws, rules and regulations;

The Board expects all directors, officers and employees of the Company ("***Covered Persons***") to be familiar with the Code and to adhere to the principles and procedures provided in the Code that apply to them. The Company also expects its business partners, service providers, consultants, contractors, and vendors to comply with the spirit of the Code in all of their dealings with the Company. The Board intends for this Code to serve as a guide for general decision-making in a variety of circumstances that Covered Persons might encounter in conducting the Company's business. The Code is not intended to be a comprehensive guide to all of the Company's policies, nor is the Code a contract or agreement between the Company and any Covered Persons or other parties. Covered Persons are also expected to adhere to all applicable policies and procedures, including those provided in the Company's employee manuals.

The Board recognizes that no code of business conduct and ethics can describe every circumstance that may present ethical or legal issues. Accordingly, Covered Persons must comply with the Code, applicable laws, rules, regulations, and Company policies, and must exercise sound judgment and the highest standards of business and personal ethics in performing their duties. Managers and supervisors have an additional responsibility to model ethical conduct, support an open and respectful working environment, and encourage Covered Persons to ask questions and raise concerns in good faith.

Covered Persons must not violate this Code. The Code will be enforced through Human Resources procedures, audits, examinations, and other appropriate review processes. Covered Persons who violate the Code may be subject to disciplinary action, including termination of employment or service. If misconduct also violates civil or criminal law, civil or criminal penalties may apply. These consequences may also apply to any Covered Person who condones, knowingly permits, or fails to report known or suspected misconduct.

This section describes the core standards of conduct expected of all Covered Persons. These standards are intended to help Covered Persons act with integrity, avoid actual or apparent conflicts of interest, protect Company and customer information, comply with applicable laws and Company policies, and seek guidance when questions arise. When in doubt, Covered Persons should promptly disclose the issue and consult their manager, Human Resources, Legal, Compliance, or another appropriate Company resource before taking action.

IV. STANDARDS OF CONDUCT

A. Ethical Conduct, Fair Dealing and Conflicts of Interest

1. Fair Dealing

The Company intends to succeed and grow through honest business competition. It is the Company's policy to compete for business only on the basis of the quality and price of the services it offers, the overall benefits it provides, and its relationships with customers over time. The Company does not seek competitive advantages through illegal or unethical business practices. Each Covered Person should endeavor to deal fairly with the Company's customers, strategic partners, service providers, suppliers, competitors, and other Covered Persons. No Covered Person should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

All Covered Persons should disclose to the Company, prior to their hire, the existence of any employment agreement, non-compete or non-solicitation agreement, confidentiality agreement or similar agreement with any previous employer that would in any way interfere with the performance of any duties or responsibilities of their positions with the Company. Copies of such agreements should be provided to the Human Resources Department to permit evaluation of the agreement in light of the Covered Person's position. In no event shall a Covered Person use any trade secrets, proprietary information or other similar

property, acquired in the course of the Covered Person's prior employment, in the performance of the Covered Person's duties for or on behalf of the Company.

2. Honest, Ethical and Candid Conduct

Each Covered Person must be mindful of the Company's reputation and role in the community. The Company conducts its business fairly, responsibly, and with integrity, and expects the same standards from its business partners, service providers, consultants, contractors, vendors, and other third parties. Because banking is based on trust, Covered Persons must act honestly in all Company matters, both internally and externally, and must avoid personal or professional conduct that could discredit the Company or undermine confidence in the Company.

Each Covered Person owes a duty to the Company to act with integrity. Integrity requires, among other things, being honest and candid while still respecting legal and ethical obligations of confidentiality. Deceit and subordination of the principles of this Code are inconsistent with integrity.

Each Covered Person must:

- Act with integrity, including being honest and candid while still maintaining the confidentiality of information where required or consistent with the Company's policies;
- observe both the form and spirit of laws and governmental rules and regulations, accounting standards and Company policies;
- engage in fair and honest practices that are tailored to meet the needs of the Company's customers and must not falsify or manipulate records or applications or engage in deceptive or high-pressure sales tactics;
- adhere to a high standard of business ethics;
- avoid conduct that would or could create an unsafe and unsound condition for the Company; and
- avoid conduct that creates even the appearance of impropriety.

3. Conflicts of Interest

A "conflict of interest" occurs when a Covered Person's personal interest interferes, or appears to interfere, with the interests of the Company or its customers. A conflict of interest may arise when a Covered Person takes actions or has interests that could make it difficult to perform their responsibilities objectively and effectively. A conflict may also arise if a Covered Person, or a member of their family, receives an improper personal benefit because of the Covered Person's position with the Company. Covered Persons must make decisions in the best interests of the Company and its customers and must not engage in any activity that creates, or appears to create, a conflict of interest.

Covered Persons must review their own activities and the activities of close family members to determine whether any situation may create an actual or apparent conflict of interest involving the Company's business. Covered Persons are expected to avoid situations in which their personal or family financial interests or obligations may conflict with their duties to the Company or its customers. Examples of potential conflicts of interest include the following:

- holding a financial interest, directly or indirectly, in an actual or potential supplier, customer or competitor of, or lender to, the Company; or transacting any business with the Company yourself, except in a manner available to any Company customer. This does not include holding widely traded stock in a public company through a mutual fund, retirement account or directly, but you must remain aware of the prohibition on trading on non-public material information;

- any transaction with the Company in which you have a significant financial interest;
- having a consulting or employment relationship with any service provider, supplier or competitor;
- any outside business activity that detracts from your ability to devote appropriate time and attention to your responsibilities with the Company;
- the receipt of other than nominal gifts or excessive entertainment from any company or individual with which the Company has current or prospective business dealings;
- being in the position of supervising, reviewing or having any influence on the job evaluation, pay or benefit of any immediate family member; and
- selling anything to the Company or buying anything from the Company.

A situation that would present a conflict for a Covered Person may also present a conflict if it involves a member of the Covered Person's family. Covered Persons should seek guidance from their manager, Human Resources, or Legal if they have any question about whether a conflict exists.

Covered Persons must not represent the Company in any transaction in which they may derive a benefit. To avoid possible conflicts of interest, loan applications submitted to Covered Persons by relatives or close personal friends (or entities controlled by relatives or close personal friends) must be submitted to other independent lending officers of equal or higher position for processing and approval. This policy also applies to the processing and approval of overdrafts.

Covered Persons must not approve their own loans, act as officer on any account on which they are a signatory, process their own transactions, or authorize refunds on any account on which they are a signatory. This prohibition applies also to loans and accounts of relatives, close personal friends and entities owned or controlled by any of them.

Covered Persons must not accept business opportunities from persons doing business or seeking to do business with the Company if those opportunities are made available to them because of their position with the Company. Covered Persons must never use their position with the Company to influence public officials or others for their personal benefit. Likewise, Covered Persons must not use their employment with the Company as leverage to gain favors from customers or suppliers.

Service to the Company should never be subordinated to personal gain or advantage. Conflicts of interest should be avoided wherever possible. The Company recognizes, however, that it is not practicable or desirable to avoid all relationships that could give rise to conflicts of interest. Accordingly, conflicts of interest, potential conflicts of interest, or relationships identified as giving rise to potential conflicts of interest that are approved as described in the following paragraph are permitted. The Company will disclose actual or potential conflicts of interest as required under SEC rules when required and appropriate. Any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest should be discussed with the Company's Chief Legal Officer if not previously approved as described in the following paragraph.

The Company is required to conduct appropriate review of all related person transactions, as defined under Item 404 of Regulation S-K and applicable Company policy, on an ongoing basis. All such transactions must be approved by the Audit Committee. Any transaction or relationship approved under this paragraph complies with this Code, and such approval shall not be considered a waiver of the Code. The Company will comply with securities laws governing conflicts of interest involving executive officers and directors.

B. External Activities, Commitments and Political Activity

4. Commitments with Third Parties

In order to avoid liability and protect the Company's reputation, Covered Persons may not make any actual or apparent, formal or informal, contracts or other commitments that purport to obligate the Company without prior proper authorization in accordance with the Company's policies and procedures.

5. Outside Engagements, Business Relationships and Activities

The Company encourages Covered Persons to be active and engaged in civic, charitable, educational and political activities, provided that such activities do not interfere with the performance of their duties at the Company or create an actual or potential conflict of interest.

6. Outside Employment

Covered Persons must obtain **written approval** before engaging in outside employment or paid services, whether as an employee or independent contractor. Covered Persons must submit the required **Outside Employment Request Form** to their manager and Human Resources. Requests will be reviewed by management and Human Resources to identify potential conflicts of interest, interference with job performance, or overlap with Company customers, vendors, stakeholders, or the financial-services industry. Certain positions are legally prohibited from holding outside employment. Outside work that is closely aligned with the Company's business or involves regulated functions is generally **not permitted**. Covered Persons must report any changes to approved outside work and must not use Company time or resources for outside employment.

7. Outside Directorships and Board Roles

Covered Persons must submit the **Outside Directorship and Board Roles Request Form** and obtain **written approval** from their manager, Human Resources, and Legal before accepting or beginning any outside directorship or board roles. Such positions may create fiduciary duties to a third party that could conflict with a Covered Person's duty to act in the best interests of the Company. Directorships or board roles involving Company customers, vendors, stakeholders, or organizations closely aligned with the Company or financial services industry require Bank approval.

Covered Persons serving in approved outside directorships or board roles must recuse themselves from any board decision involving the Company, including decisions about borrowing from the Company, opening or closing accounts, or commencing, continuing, or terminating a banking relationship. Covered Persons must also avoid receiving information about the third party that could reasonably affect its relationship with the Company until that information has been formally shared with the Company. Covered Persons must ensure that the third party conducts its affairs lawfully, ethically, and prudently; if they cannot do so, they must resign. Confidential or proprietary Company information must never be disclosed in connection with any outside directorship or board role.

8. Outside Speaking Engagements

Covered Persons must obtain written approval from their manager and Human Resources, and must submit the Outside Speaking Engagement Request Form, before participating in any outside speaking engagement, including conferences, panels, webinars, industry events, or media appearances where their affiliation with the Company may be identified. All slides, written materials, and other materials distributed to attendees must be reviewed and approved by Legal before use. Requests are reviewed for potential conflicts of interest, confidentiality risks, and overlap with Company customers, vendors, stakeholders, or the financial-services industry.

Covered Persons may participate in trade association meetings and conferences if they comply with Company policy and all applicable fair-competition and antitrust requirements. Attendance paid for by a customer, vendor, or supplier should be rare and must comply with applicable law and Company policy.

Covered Persons must not disclose confidential or proprietary Company information or use Company time or resources for outside speaking engagements unless expressly approved.

9. Running for Political Office

Covered Persons must obtain **written approval** from their manager, Human Resources, and Legal before announcing a candidacy or engaging in campaign activity. Political activity must not interfere with job duties, create a conflict of interest, or use Company time, resources, or confidential information.

C. Vendor Relationships, Disclosure and Financial Integrity

10. Selection of Vendors, and Purchasing Goods and Services

Vendor selection must be based on the quality of the vendor, service, or product; the ability of the vendor, service, or product to meet the Company's needs; and competitive pricing for value received. Covered Persons must comply with the Company's vendor management policy when selecting or retaining vendors. Self-dealing or personal advantage, whether actual or perceived, is prohibited in connection with vendor selection. Irregularities in procurement are contrary to the Company's ethical standards and may be illegal. Federal and state fair-dealing laws may prohibit payments or other benefits to employees or agents of third parties, without the consent of the employer or principal, for the purpose of obtaining business for the Company. Covered Persons with concerns about the propriety of any payment must consult Human Resources.

Covered Persons should avoid giving legal, tax, or other professional advice to the Company's customers, prospective customers, contractors, or vendors unless providing that advice is part of their regular Company duties. If a customer, prospective customer, supplier, or other party asks for a recommendation of a third-party professional, such as an attorney, accountant, or real estate agent, the Covered Person should provide several candidates in writing and make clear that the recommendations are not sponsored or endorsed by the Company.

11. Disclosure

The Company's periodic reports and other documents filed under the Exchange Act with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each Covered Person who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each Covered Person must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

Each Covered Person who is involved in the Company's disclosure process must:

- be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting;
- take all necessary steps to ensure that all Exchange Act filings with the SEC and all other public communications about the general business, results, financial condition and prospects of the Company provide full, fair, accurate, timely and understandable disclosure.

12. Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policies

The Company maintains an enterprise-wide compliance program designed to comply with applicable bribery, corruption, and anti-money laundering laws and regulations. Bribery includes the offer, promise, or payment of cash, gifts, excessive entertainment, or any other inducement to a person in a position of trust to influence that person's conduct or obtain an improper advantage. Bribery is prohibited regardless of amount, whether or not the other party is a government official, and whether or not a Covered Person believes the conduct may benefit the Company or the Covered Person. Covered Persons must comply with the Company's Anti-Money Laundering and Treasury's Office of Foreign Assets Control Policy, which addresses applicable anti-money laundering, counter-terrorist financing, and sanctions requirements. The Company regularly assesses risks associated with its business, including potential corruption or bribery risks, and maintains management systems designed to address those risks.

Covered Persons must not provide any payment, loan, gift, entertainment, or anything else of value to labor organizations or their representatives unless the transaction has been pre-approved by the Chief Legal Officer, because these transactions are subject to strict laws and regulations.

13. Trading on Insider Information Prohibited

It is against Company policy and, in many circumstances, illegal for any Covered Person to profit from undisclosed information relating to the Company or any other company. Covered Persons must not purchase or sell securities of the Company or any company based on material information that has not been made public. Certain Covered Persons have additional restrictions placed on their personal investments under applicable laws that may include reporting and pre-clearance of various types of securities transactions. The Company's policies and procedures regarding insider trading are disclosed in the Company's Insider Trading Policy, and each Covered Person is expected to become familiar with and comply with that policy.

14. Personal Investments

Covered Persons must exercise particular care with investments that may appear improper to customers, regulators, or the public. Covered Persons should consult the Chief Executive Officer or Chief Financial Officer before making or maintaining any investment that may create even the appearance of impropriety. Covered Persons should avoid transactions that may create the appearance that they are improperly benefiting from their relationship with the Company. This obligation also applies to investments by immediate family members. Covered Persons who are responsible for a customer, supplier, or vendor relationship should exercise caution regarding potential investments in that business or its securities. Under no circumstances may a Covered Person use customer information as a basis for personal investment decisions.

While a complete list of such matters cannot be given, you must refrain from directly or indirectly owning or purchasing any of the following, unless specifically approved in writing by an unrelated executive officer of the Company:

- Real or personal property in which the Company has or intends to obtain an ownership interest (e.g., through purchase, foreclosure or repossession, or in a fiduciary capacity).
- Stocks, bonds or other securities about which you have or could be expected to have confidential information (e.g., a proposed merger involving a customer).
- Security deeds, mortgages or chattel mortgages that create a security interest in property in which the Company has a security interest.
- An interest in any business entity that is a customer or supplier of the Company. This limitation does not apply to directors who are not officers of the Company or to ownership of the stock of

any public company by a Covered Person who does not possess confidential information about that company.

- An interest in a company for which you are the account officer.

D. Workplace Standards, Fair Treatment and Human Rights

15. Equal Employment Opportunity, Affirmative Action and Prohibitions on Discrimination and Harassment

The Company has a long-standing history of nondiscrimination in its employment practices. It is the Company's policy to provide equal employment opportunities to all applicants and employees and not to discriminate on any prohibited basis under the law, including race, creed, color, citizenship status, religion, religious affiliations, sex, sexual orientation, gender identity, marital status, age, national origin, familial status, military status, status as an individual with a disability or status as a veteran, status as the victim of domestic violence, or any other legally protected status. It is also the Company's policy to affirmatively seek to advance the principles of equal employment opportunity. Additionally, the Company prohibits the use of genetic information in making decisions related to any terms, conditions, or privileges of employment, and prohibits retaliation based on any genetic information that may be known regarding any Covered Person.

Further, it is the policy of the Company to comply voluntarily with the concepts and practices of affirmative action. The Company's objective is to employ, transfer and promote Covered Persons whose experience, interests, education and training, in the Company's judgment, qualify them for the position to be filled.

It is the responsibility of every Covered Person to give the policy of equal employment opportunity full support and real meaning for all. A detailed EEO Policy is available as part of the Company's Policy Manual.

The Company intends to provide a work environment that is pleasant, healthful, comfortable, and free from any form of intimidation, hostility, or other conduct that might interfere with work performance. Discrimination or harassment in any form—verbal, physical, or visual—including, but not limited to, harassment and/or discrimination based on race, creed, color, citizenship status, religion, sex, sexual orientation, gender identity, marital status, age, national origin, disability, ethnicity, status as the victim of domestic violence, or any other legally protected status, will not be tolerated.

With this in mind, it is the Company's policy that each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including sexual harassment in any form. A detailed anti-harassment policy is available as part of the Policy Manual.

Covered Persons who observe conduct that may violate this Code, including harassment or discrimination, should report the matter to Human Resources at humanresourcesmailbox@amalgamatedbank.com or through the Ethics Hotline at 855-375-2300.

E. Customer Fairness, Legal Compliance and Regulatory Obligations

16. Fair Lending

The Company does not condone discrimination of any kind, including with respect to customers and potential customers. The Company is committed to ensuring compliance with all applicable fair lending and responsible banking laws and regulations, including the Equal Credit Opportunity Act, Fair Housing

Act, Fair Credit Reporting Act, and similar state laws.

17. Conduct Manual for Unregistered Employees Supporting Financial Product Sales

Amalgamated Bank has entered into an arrangement with Osaic Institutions. ("Osaic") ("Broker-Dealer") whereby Broker-Dealer will offer securities and insurance related products ("Financial Products") to our customers. Since you are not licensed or qualified to sell Financial Products, you must be very careful not to perform any activities or provide any information to customers that could confuse a customer as to your role in the sale of Financial Products. Under federal and state securities laws, and state insurance laws, only properly licensed, registered, and qualified persons may solicit customers or recommend or discuss insurance or investment products with a customer.

In sum, this means that you should provide only "clerical" and "ministerial" services. Your permissible activities shall be limited to:

- referring prospective customers to an appropriately licensed employee or agent of Broker-Dealer and Agency ("Licensed Person") via the referral form on Mission Central,
- arranging an appointment with or taking a message for a Licensed Person if a Licensed Person is unavailable,
- referring telephone calls and other written and oral communications to a Licensed Person, and
- referring all Financial Products-related questions to a Licensed Person.

When engaging in any of the foregoing permissible activities, you must limit your discussion of the Financial Products to statements advising customers of the availability of information about the Financial Products from Broker-Dealer and the referral of such customer to a Licensed Person. You shall not:

i. hold yourself out as representing Broker-Dealer,

ii. attempt to solicit or receive orders for the purchase or sale of Financial Products,

iii. recommend any Financial Product or give any other form of investment advice,

iv. describe Financial Products or discuss the merits of any Financial products,

v. handle any question that might require familiarity with the securities or insurance industry or the exercise of judgment regarding securities, insurance and investment alternatives,

vi. accept or deliver money or Financial Products in connection with transactions except that payments for Financial Products purchased may be made by checks drawn on or account transfers from, and proceeds of Financial Products sold may be deposited in, accounts maintained at Amalgamated Bank,

vii. accept or transmit order for the execution of Financial Product transactions,

viii. advise customers regarding the types of securities accounts to be opened, solicit securities accounts, fill out securities account forms, or provide similar services with respect to insurance products, or

ix. otherwise engage in the securities or insurance business.

Nothing in this Conduct Manual shall limit you from providing administrative or clerical services to Broker-Dealer.

18. Proper Accounting

All assets, liabilities, revenues and expenses, whether actual, contingent or accrued, of the Company shall

be recorded in its regular books and records in a timely manner and must accurately and fully reflect and properly describe the transactions they record. To the extent cash is received on behalf of the Company for goods, products or services, proper receipts and records must be maintained using generally accepted accounting practices in banking and in accordance with laws and regulations governing the Company. The following are examples of practices that are prohibited:

- Undisclosed "off-the-book" accounts or funds.
- False entries in any of the Company's books or records.
- Payments made with the understanding that any part is to be used for a purpose other than that described by the documents supporting the payment.

Also, the Company is totally committed to its policy of adhering to candor in dealings with its auditors, examiners and legal counsel. If it has come to your attention that any Covered Person has violated this policy, you must report it immediately to your supervisor, senior management or through the Ethics Hotline.

19. Political Contributions

Except as specifically authorized in writing by the Chief Executive Officer, neither the Company nor its Political Action Committee will directly or indirectly make any contributions of money, property or services to any government official, political candidate, political party or committee, whether local, state or federally related. Such contributions are subject to federal, state and local laws and regulations that impose strict limits on such contributions and require aggregation and reporting. Therefore, except as specifically provided above, Company personnel may not use or allow the use of any Company funds, services, or property for political purposes.

Among other things, this prohibition applies to:

- Indirect and direct contributions.
- Loans on preferential terms.
- Contributions in the form of services, materials, products as well as cash contributions.
- Offering or allowing the use of its facilities, equipment, supplies, and personnel in connection with any political activity.
- Purchase of tickets for fund raising events.

This prohibition relates only to use of the Company's funds, property and services, and is not intended to discourage Company personnel from making lawful personal contributions to candidates, political parties, committees or other political persons or groups of their choice. However, Directors and certain members of senior management should refer to the Policy on Political Contributions where the Company does business with State or Local Governments regarding specific limitations applying to them.

20. The Bank Bribery Law

Under federal criminal law, a person who has a business relationship with the Company may not give, offer or promise anything of value to a Covered Person with intent to influence corruptly the conduct of the Covered Person. In addition, it is a criminal act for a Covered Person to seek, accept, or agree to accept anything of value from a person who has a business relationship with the Company with the intent to influence corruptly the conduct of the Covered Person.

However, not all gifts are unlawful. Covered Persons may generally agree to accept the following:

- Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships where the circumstances make it clear that it is those relationships rather than the business of the Company concerned which are the motivating factors.
- Acceptance of meals, refreshments, entertainment, accommodations or travel arrangements, all of reasonable value not exceeding $250.00, in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the Company as a reasonable business expense if not paid for by another party.
- Acceptance of loans from other banks or financial institutions on customary terms to finance proper and usual activities of Company officials, such as home mortgage loans, except where prohibited by law.
- Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars and similar items.
- Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers.
- Acceptance of gifts of reasonable value not exceeding $250.00 that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, holiday or birthday (however, gifts in the form of cash or cash equivalents are prohibited, even if under $250.00);
- Acceptance of civic, charitable, educational, or religious organization awards not valued in excess of $250.00 for recognition of service and accomplishment.

Acceptance of the foregoing benefits will generally not amount to a corrupting influence on the Company's transactions. On a case-by-case basis, the Company may also approve of other circumstances, not identified above, in which a Company official accepts something of value in connection with the Company's business, provided that such approval is made in writing, through the Human Resources Department, on the basis of a full written disclosure of all relevant facts and is consistent with the Bank Bribery Law. If a Company official is offered or receives something of value from someone with a business relationship with the Company other than as listed above, the Company official must disclose that fact to the Head of Human Resources.

21. Anti-Trust Law

The Company supports vigorous competition and freedom of choice for customers. Covered Persons must comply with all applicable federal, state, and international antitrust or competition laws designed to protect commerce from unlawful restraints, monopolies, and unfair business practices that impede healthy competition.

22. Compliance with Other Laws and Regulations

The Company's policy is to comply with the laws of federal, state, and local governments applicable to the Company and the rules and regulations of private and public regulatory agencies having jurisdiction over the Company. This includes federal securities laws regarding required disclosure and prohibitions on selective disclosure, federal, state and local laws regarding discrimination and equal opportunity in employment, and applicable banking regulations. Although not all Covered Persons are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from managers or other appropriate personnel.

23. Litigation Holds

Each Covered Person must maintain and preserve any documents or records which are relevant to any current litigation, or to any pending, threatened, or foreseeable regulatory investigation or proceeding, as part of the Company's retention policies. Any acts by a Covered Person to deliberately destroy, alter or conceal documents or records in an attempt to delay or slow any investigation or litigation (whether current or merely threatened) will be considered a violation of this Code. Further, such acts may be illegal, even if the Company was not obligated to produce the records at that time.

24. Corporate Opportunities

Covered Persons owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Covered Persons are prohibited from taking (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down definitively.

Generally, Covered Persons are prohibited from using corporate property, information or position for personal gain and from competing with the Company. Business opportunities that are presented to Covered Persons of the Company either in their capacity as such or specifically for the use and benefit of the Company must be first presented to the Company before being directed elsewhere.

25. BSA/AML Governmental Related Requests for Information

Pursuant to federal law, the Board has adopted a comprehensive Bank Secrecy Act/Anti Money Laundering ("***BSA/AML***") Program. All Covered Persons are required to be familiar with the BSA/AML Program and to adhere to its requirements. The Company is also required to respond to certain requests made by government authorities for information in its possession that may bear upon ongoing investigations of violations of the BSA/AML statutes, or anti-terrorist statutes. In all cases, such information requests must be directed to the Company's Compliance Department.

26. Other Governmental Requests for Information

It is the policy of the Company to cooperate with reasonable requests made by federal, state, governmental and municipal investigators seeking information concerning Company operations.

At the same time, the Company and its customers are entitled to all the safeguards provided by law for the benefit of persons under investigation.

<u>If a representative of any governmental agency requests an interview with any Company personnel, seeks data or copies of documents, or seeks access to files, the request must be referred to the Chief Legal Officer's office or, for personnel or medical records, to the Human Resources Department. If the request comes from a representative of the FDIC, Fed, or NYDFS, the request should be cleared with the Covered Person's supervisor. Except as specified in this paragraph, Company personnel must not directly provide information, access to documents, or other information sources to any government representative.</u>

F. Confidentiality, Information Protection and Company Assets

27. Confidentiality

In carrying out the Company's business, Covered Persons often learn confidential or proprietary information about the Company, its suppliers, customers, and potential customers. Customers rely on the Company to

exercise care and prudence when managing their financial affairs, funds, property, and related matters.

Covered Persons must maintain the confidentiality of all information entrusted to them, except when disclosure is expressly authorized or required or permitted by law. Confidential information includes all nonpublic information that might be useful to competitors or harmful to the Company, Covered Persons, or customers if disclosed, as well as information that suppliers and customers have entrusted to the Company. Covered Persons must not provide former Company employees with nonpublic information. The obligation to preserve confidential information continues after employment or service as a director ends. For additional requirements, Covered Persons should refer to the Company's Data Classification and Information Protection Policy and Privacy Policies.

28. Customer Information Confidentiality

The preservation of customer confidences and privacy is essential to the Company's business and reputation. The Company is also subject to specific federal and state laws and regulations that govern its handling of personal information it maintains regarding customers who are natural persons. For example, the Gramm-Leach-Bliley Act (the "***GLB Act***") and its related regulations and guidelines protect personal information of natural persons with whom the Company has a customer relationship, as reflected in the Company's annual Privacy Policy. The Right to Financial Privacy Act protects such persons from certain governmental inquiries and establishes procedural requirements for the Company to follow in handling such requests.

Breach of this duty can lead to civil liability as well as substantial reputational damage to the Company. Accordingly, the Company's general policy is to maintain the confidentiality of all customer records. Every Covered Person has a duty to protect the confidential nature of the Company's customers' financial and other records.

Customer and employee information must be collected or accessed only for legitimate and permitted business purposes. Such information must be maintained in a secure form and environment and transported or accessed in accordance with applicable Company policies. If customer or employee information is no longer needed, it must be retained only for the applicable retention period. Covered Persons must immediately report any actual or suspected loss, theft, compromise, misplacement, or unauthorized disclosure of customer or employee information.

Except as permitted below, Covered Persons must not knowingly:

a. Reveal a confidence or secret regarding a customer of the Company or the customer's business with the Company.

b. Use a confidence or secret of a customer or the Company to the disadvantage of the customer or the Company.

c. Use a confidence or secret of a customer or the Company for your own benefit or that of a third party, unless the customer or the Company, respectively, consents to it in writing.

Covered Persons may reveal confidences or secrets only in the following circumstances:

d. Confidences or secrets with the written consent of the customer(s) affected, or the Company, but only after a full disclosure to them.

e. Confidences or secrets when required by law (such as disclosures to bank examiners in the course of an examination) or legitimate court order or subpoena (in consultation with the Company's Chief Legal Officer).

f. Confidences or secrets necessary to prevent a crime.

g. Confidences or secrets when requested by law enforcement authorities, but only when consistent with the Right to Financial Privacy Act or other authority governing the requesting agency and in consultation with the Company's Chief Legal Officer.

h. Nonpublic personal information, as defined in the GLB Act and its related regulations and guidelines, but only to the extent of the available exemptions of the statute as reflected in the current Privacy Policy issued by the Company.

Risks associated with the electronic communication and processing of confidential information, by email or through the Internet, make it imperative that you take extra care to protect confidential information when communicating electronically. You should be aware of and comply with the Company's email and internet use policies.

29. Intellectual Property, Work Product, and Confidentiality

This Code section requires employees to protect the Bank's intellectual property and Confidential Information and to provide information reasonably needed to determine whether Work Product is covered, while preserving rights available under the laws where they work.

Definitions and Scope. "Work Product" means inventions, discoveries, improvements, processes, software, designs, documents, data, reports, and other materials that: (a) relate, when conceived, created, or reduced to practice, to the Bank's business or actual or demonstrably anticipated research or development; (b) result from work for the Bank; or (c) use Bank resources or Confidential Information. The separate invention-assignment agreement governs the assignment of Work Product. However, neither that agreement nor this section applies to an invention that an employee has the legal right to keep. If this section provides greater employee protection than the agreement, this section controls. "Confidential Information" means non-public information about the Bank or its clients, employees, vendors, operations, technology, finances, strategy, risks, compliance activities, or other proprietary matters.

Ownership and Assignment. Employees must sign the Bank's separate Employee Intellectual Property Assignment and Confidentiality Agreement (the "IP Assignment Agreement"), except to the extent applicable law permits them to retain their rights. Copyrightable Work Product created as part of an employee's job is a work made for hire when recognized by law; otherwise, ownership is addressed in that agreement.

Disclosure and Further Assurances. Employees must promptly provide information reasonably needed to determine whether an invention or other material is covered by the agreement. The Bank will keep that information confidential and use it only to evaluate or protect the parties' rights. At the Bank's reasonable request and expense, employees must take the steps required by the agreement to protect the Bank's rights. Providing information alone does not transfer an invention that an employee has the legal right to keep.

Pre-Existing and Third-Party Materials. Employees keep ownership of materials they created before joining the Bank or that are not covered by this section or the IP Assignment Agreement. Before including those materials in Work Product, employees must identify them and obtain the Bank's written approval. Approval does not transfer ownership. Employees must also obtain authorization before using third-party materials. Any required license or transfer must be documented in the IP Assignment Agreement or another written agreement.

Employee Invention Rights and Notices. This section and the IP Assignment Agreement must honor employee rights under the laws that apply where employees work. Employees do not have to assign

inventions they have the legal right to keep. These protections do not limit the Bank's rights in other Work Product.

- California Notice**.** California employees keep inventions developed entirely on their own time without using the Bank's equipment, supplies, facilities, or trade secret information, unless an invention: (a) relates, when conceived or reduced to practice, to the Bank's business or actual or demonstrably anticipated research or development; or (b) results from work performed for the Bank. The Bank will limit access to disclosed information to those who need it to evaluate or protect the parties' rights. The Bank will provide any written notice required when an assignment agreement is made. An employee claiming this protection must show that the invention qualifies.
- New York Limitation**.** New York employees keep inventions developed entirely on their own time without using the Bank's equipment, supplies, facilities, or trade secret information, unless an invention: (a) relates, when conceived or reduced to practice, to the Bank's business or actual or demonstrably anticipated research or development; or (b) results from work performed for the Bank. Any provision requiring assignment of an invention protected by New York law is unenforceable.

Confidentiality. Subject to the protected-activity section below, employees must protect Confidential Information during and after employment, use it only for Bank business, and disclose it only as authorized or required by law. Confidential Information does not include information that is public without a breach of duty, lawfully received without a confidentiality obligation, independently developed without using Confidential Information, or part of an employee's general skills and experience.

Protected Activity and Required Disclosures. Nothing in this section or the Code prevents employees from reporting possible wrongdoing; filing a charge or complaint; communicating with or assisting a government agency, law-enforcement authority, investigation, or proceeding; making a protected whistleblower report; discussing wages, hours, or working conditions or engaging in other protected workplace activity; consulting legal counsel; receiving a whistleblower award; or making a disclosure required by a subpoena, court order, or other legal requirement. No Bank permission or notice is required. When legally permitted and without interfering with protected activity, employees are encouraged—but not required—to notify the Bank of a compelled disclosure so the Bank may seek appropriate safeguards.

Federal Trade Secret Immunity Notice. Under 18 U.S.C. § 1833(b)(1), an individual is not criminally or civilly liable under federal or state trade secret law for disclosing a trade secret: (a) in confidence, directly or indirectly, to a federal, state, or local government official or to an attorney, solely to report or investigate a suspected violation of law; or (b) in a complaint or other document filed under seal in a lawsuit or other proceeding. Under 18 U.S.C. § 1833(b)(2), an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual's attorney and use it in the court proceeding if any document containing the trade secret is filed under seal and the trade secret is not otherwise disclosed except by court order.

Safeguarding and Return of Information. Employees must follow the Bank's information-security and records-management requirements and promptly report suspected loss or unauthorized access, use, or disclosure. At the request of Human Resources or Legal Counsel, or when employment ends, employees must return Bank property and, where practicable, return or securely delete Confidential Information and Bank records. Information may be retained when required by a legal hold or other legal or recordkeeping obligation, when stored in inaccessible backups, or when needed for protected activity. Any retained information remains subject to reasonable safeguards that do not restrict protected activity.

Compliance. Violations may result in discipline, up to and including termination, consistent with any applicable collective bargaining agreement. The Bank will not discipline or retaliate against anyone for reporting a concern, assisting an investigation, or engaging in any other lawful protected activity.

30. Artificial Intelligence, Smart Devices, and Recording Technologies

Covered Persons must use artificial intelligence (AI) tools, smart devices, and recording-capable technologies in full compliance with the Company's confidentiality, privacy, information security, and regulatory obligations. Company information—including customer data, non-public personal information (NPI), material non-public information (MNPI), proprietary materials, and internal work product—must not be entered into, transmitted to, or otherwise exposed to any external AI system unless the tool has undergone formal review and has been expressly approved for business use by the Company's Information Security, Privacy, Risk, and Compliance functions.

The use of AI in connection with customer interactions, credit-related activities, servicing, operational decision-making, or any other regulated functions is prohibited unless the system has been approved, validated, and subjected to appropriate human oversight in accordance with applicable OCC, FDIC, and CFPB supervisory expectations, including expectations related to model risk management, data governance, consumer-protection controls, and the prevention of unfair, deceptive, or abusive acts or practices.

Smart glasses, wearable technologies, and any device capable of capturing audio, video, images, biometric identifiers, or geolocation information are prohibited in Company facilities, customer locations, and during Company business unless expressly authorized in writing. Recording any conversation, meeting, or interaction—whether through Company-issued or personal devices—is prohibited without prior approval and all legally required consents.

Nothing in this policy is intended to restrict or interfere with employees' rights under Section 7 of the National Labor Relations Act or any other applicable workplace law. Any limitations on recording or device use apply only to the extent permitted by law. Covered Persons must immediately report any suspected misuse, unauthorized disclosure, data exposure, or control failure involving AI systems or recording-capable technologies.

31. Protection and Proper Use of Company Assets

Covered Persons must protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste directly affect the Company's operations and profitability.

Company property, including office supplies, computer equipment and software, records, customer information, and the Company's name and logo, must be used only for legitimate business purposes, although incidental personal use may be permitted. Subject to applicable law, the Company retains the right to access, review, monitor, and disclose information transmitted, received, or stored using Company electronic equipment, with or without a Covered Person's knowledge, consent, or approval. Any misuse or suspected misuse of Company assets, including fraud or theft, must be reported as set forth in this Code.

The obligation of Covered Persons to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, service marks and copyrights, as well as business, marketing and service plans, designs, databases, records, and any unpublished financial data and reports. Unauthorized use or distribution of this information violates our corporate policy. It could also be illegal and result in civil or even criminal penalties. Covered Persons are also annually required to be trained in matters such as identity theft, information security, privacy, and

cyber security. These trainings are meant to ensure that Covered Persons have the tools they need to protect proprietary information, including our customers' information and employee information. They also provide important information regarding information security awareness, consumer privacy, and appropriate uses of customer information.

Covered Persons must promptly report suspected compromises of the Company's information technology infrastructure to their manager or the Chief Information Security Officer.

Covered Persons must return company property at any time, upon request by the Company. At the end of employment (whether it ends voluntarily or involuntarily), Covered Persons must return all company property, provide password(s) and take all steps required to assist the Company in accessing the devices that the Covered Person used while at the Company.

32. E-mail, Social Media, and the Internet

Electronic mail (e-mail) systems, including electronic bulletin boards and other electronic communications devices, and internet services in the workplace or provided by the Company ("***Systems***") are the property of the Company and should be used for business purposes; however, reasonable personal use is permitted, consistent with this Code of Ethics and all other Company policies, so long as such use does not interfere with the efficiency of the Systems or interfere with or disrupt the ability of other Covered Persons to perform their duties for the Company. Furthermore, emailing Company information, documentation, or intellectual property to a personal email account is strictly prohibited.

Participation in blogs, social media, digital channels or applications that allow the creation, sharing, or discussion of content, or similar forums will be treated as public communication. Covered Persons must exercise sound judgment when using social media. Covered Persons must not post videos or content that feature Company or branch locations, disclose Company information, or show employees in their work environment. Internet communications by or between Company personnel may also be treated as public communications, depending on the audience and security measures used to protect the communication.

Any disclosure of information about the Company or its business in these forums is subject to the restrictions and limitations in this Code. This policy does not restrict Covered Persons from speaking, writing, or communicating with fellow Covered Persons or others about wages, benefits, or other terms or conditions of employment during non-working time, including before or after scheduled work time or during scheduled meal and rest periods.

Subject to applicable laws and regulations, the Company reserves the right to monitor, review and disclose e-mail, instant messaging and internet access by Covered Persons from Company premises or using Company equipment or assets, as it deems appropriate. Covered Persons should have no expectation of privacy with respect to their use of the Company's Systems or Internet portal.

Covered Persons are expected to remain familiar with the Company's electronic communications policies, including requirements for e-mail and internet use set forth in the Technology Use Agreement. Covered Persons should contact Human Resources with questions regarding the Company's information technology policies, electronic communications policies, or other technology-related requirements.

The Company's policies, procedures, and controls for protecting information apply to business use of artificial intelligence, machine learning, and generative AI. AI applications must not be installed on Company devices without approval from the Chief Information Security Officer, Chief Technology Officer, and Chief Risk Officer. The Company evaluates emerging technologies in a responsible manner and protects data used for AI by applying appropriate data controls, user permissions, and information

privacy safeguards.

G. External Communications, Insider Lending and Labor Rights

33. Contacts with the News Media

The Company seeks to maintain constructive relationships with local and national news media and to respond appropriately to media inquiries. At the same time, information about the Company, including information about personal banking customers, corporate customers, specific banking transactions, proprietary products and programs, and other competitively sensitive information, must not be disclosed publicly unless authorized. The Company's marketing team is responsible for official Company responses. Covered Persons who receive a request from the press for an official Company comment must direct the inquiry to the Director of Public Relations.

34. Loans and Extensions of Credit

Any loan to an executive officer, principal stockholder, or director (or related interest) must comply fully with all laws and regulations including Regulation O (12 C.F.R. §215). Loans to insiders must be on substantially the same terms as with any other Company customer of comparable credit risk. In this respect, loans cannot contain favorable interest rates and must not involve more than the normal risk of repayment. Executive officers may participate in any employee loan program and receive the same rate of consideration available to all employees under that plan. Again, loans should not be made to any employee, executive officer or other insider that involves more than a normal risk of repayment.

Specific limitations on loans to insiders are provided in the Company's Regulation O policy.

35. Collective Bargaining

The Company explicitly supports freedom of association and respects the rights of workers to lawfully and peacefully associate, organize and bargain collectively, without interference and free from discrimination. The Company also respects and adheres to universal principles and norms that protect human rights in employment, as specified in the UN Global Compact (UNGC), including, among other matters, with respect to the freedom of association and the freedom to conduct collective negotiations, as described in the Human Rights Statement. For more detail, please refer to the Company's Freedom of Association and Collective Bargaining Policy located here.

36. Diversity and Inclusion

The Company is committed to maintaining a professional environment that is diverse, inclusive, accessible, and respectful. The Company seeks to ensure that Covered Persons are treated fairly and can perform their work free from conscious or unconscious bias. The Company supports equal rights and safe, open participation in the workplace for LGBTQ+ people. The Company provides annual training on conscious and unconscious bias. To support web accessibility and usability for customers, the Company engages an independent firm annually to perform an Americans with Disabilities Act ("***ADA***") corporate website accessibility audit to confirm continued compliance with ADA requirements.

37. Health and Safety

The Company is committed to providing a safe working environment for our Covered Persons. The Company also upholds all OSHA regulations and other applicable laws for workplace safety.

38. Respect for Human Rights

The Company is committed to the protection and preservation of human rights. The Company strives to conduct its business in a manner consistent with the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's Fundamental Conventions. The Company is committed to treating every Covered Person with respect and dignity and protecting their human rights. The Company abides by all labor laws and regulations and does not tolerate corruption, discrimination, harassment, forced or child labor, or slavery in any form. The Company values an open dialogue with its Covered Persons so they may continue to improve their work environment as well as the service the Company provides its customers. For more details, please refer to the Company's Human Rights Statement located here.

V. RESPONSIBILITIES OF MANAGEMENT AND LEADERS

Covered Persons are personally responsible for making ethical choices and complying with this Code. Managers and supervisors have an additional responsibility to demonstrate the Company's values, uphold the spirit and intent of the Code, and set an example for ethical conduct. Managers and supervisors are expected to demonstrate leadership by:

- Maintaining a culture of ethical conduct, respect, and integrity;
- Reviewing the Code at least annually with your team;
- Ensuring Covered Persons have the resources to understand their job duties;
- Fostering an environment which encourages Covered Persons to raise questions and concerns without fear of retaliation;
- Working with Covered Persons you supervise to support their compliance with the Code, company policies and procedures, including in regard to workplace harassment and discrimination of any kind;
- Reporting instances of non-compliance through appropriate channels; and
- Taking appropriate disciplinary action for compliance and ethics violations.

Reporting Responsibilities

Covered Persons should not attempt to investigate issues on their own. Covered Persons must promptly report questions or concerns about what to do in a particular situation or about known or suspected conduct that may violate the law, Company policy, or this Code. If there is a genuine risk, the matter must be escalated immediately. A manager is usually an appropriate place to start; Human Resources, Legal, or Compliance may also be contacted.

VI. REPORTING AND ENFORCEMENT

Upon hiring or appointment, each Covered Person must attest that they have read and understood the Company's Code. In addition, each Covered Person must attest annually to adherence to the Code.
Covered Persons who have concerns about conduct that may violate law, regulation, Company policy, or this Code, or who become aware of questionable legal, financial, or accounting matters, should take one or more of the following steps:

- Discuss the situation with their manager or another manager with whom they feel comfortable; or

- Contact the Head of Human Resources, the Company's Chief Legal Officer, or the Chair of the Audit Committee.

Covered Persons may also report concerns through the confidential Ethics-HR Hotline ("Hotline"), which is available 24 hours a day, seven days a week. The Hotline provides a channel for Covered Persons to raise concerns anonymously, where permitted by law, to management and, as appropriate, the Audit Committee. To support confidentiality and anonymity, the Company uses a third-party vendor to operate the Hotline.

Covered Persons may call the Ethics Hotline toll-free at 855-375-2300.

A. Hotline Procedures and Protocols

The Company's Hotline is a shared service that provides a secure and confidential channel to report Ethics and Compliance issues and Human Resources concerns. This process supports prompt review while safeguarding privacy and maintaining appropriate oversight. Ethics and Compliance issues involve potential breaches of law, regulation, or Company policy. Human Resources concerns involve workplace conditions and employment matters.

B. Key Differences:

Category	Description	Examples	Reviewing Authority	Access
Ethics & Compliance Issues	Violations of corporate policy, legal statutes, or regulatory standards.	Breaches of the Code of Conduct, financial misconduct or fraud, theft, bribery, and legal compliance-related harassment or discrimination.	Audit Committee	Access to Ethics and Compliance reports is strictly limited to designated senior leadership, including the Chief Executive Officer, Chief Human Resources Officer, Chief Legal Officer, Chief Risk Officer, Chief Audit Executive, and the Audit Committee, ensuring proper follow-up and the protection of privacy.
Human Resources Concerns	Matters pertaining to workplace conditions or employment.	Workplace conflicts, performance concerns, general employment questions or issues.	Human Resources and Management	Human Resources concerns are reviewed by HR, legal, and management and are not shared with the Audit Committee.

C. Reporting Process and Information Access

Reports submitted through the Hotline are handled in confidence to the extent practicable and consistent with applicable law and Company policy. Access to Ethics and Compliance report details is restricted to designated senior leaders and the Audit Committee, as appropriate, to support proper oversight and protect employee privacy. Human Resources concerns are evaluated by Human Resources, Legal, and management and are not disclosed to the Audit Committee unless required by law, Company policy, or the nature of the matter.

If an Ethics and Compliance report concerns a senior leader, the complaint is withheld from the individual referenced to prevent conflicts of interest and promote impartial investigation.

<u>Safeguards for Confidentiality and Fairness</u>

- Employee identity is protected throughout the reporting process.
- Employees may request updates regarding the status of their concerns.

- Support resources are available both during and after the reporting process.
- All reports are investigated impartially and comprehensively, with a strict prohibition on retaliation.

The Company is committed to maintaining confidentiality, conducting fair reviews, and prohibiting retaliation. Covered Persons are encouraged to use the Hotline to report concerns or seek assistance.

The Audit Committee is ultimately responsible for applying this Code to specific situations in which questions are presented to it and has the authority to interpret this Code in any particular situation. The Audit Committee shall take all action it considers appropriate to investigate any violations reported to it and will make all determinations regarding whether a violation has occurred. If a violation has occurred, the Audit Committee will take such disciplinary or preventive action as it deems appropriate, in consultation with in-house or outside corporate/securities counsel, if necessary or appropriate.

Covered Persons who are asked to participate in an appropriately authorized internal or external investigation must:

- Cooperate fully.
- Provide accurate and comprehensive information within your knowledge.
- Not withhold, tamper with, or fail to communicate relevant information within your knowledge.
- Not knowingly or intentionally make false statements to internal or external auditors, investigators, legal counsel, Bank representatives, regulators, or other governmental entities.
- To the extent consistent with applicable law, maintain and safeguard the confidentiality of an investigation to the extent practicable so as not to compromise the integrity of the investigation.

Covered Persons are personally responsible for complying with this Code and for misconduct, including improper or illegal acts, committed during their relationship with the Company. Covered Persons must remain alert to possible Code violations and escalate known or suspected violations through the reporting process described in this Code.

Covered Persons must not remain silent when they become aware of a potential violation. A Covered Person who knows of a potential violation and fails to report it through the process described above may be subject to disciplinary action under this Code.

All Covered Persons must cooperate with any investigation regarding an alleged violation of the Code.

VII. NO RETALIATION

The Board believes it to be in the best interests of the Company that Covered Persons act in a manner consistent with this Code and not suffer harm for doing so. Accordingly, the Company does not tolerate acts of retaliation against any Covered Person who makes a good faith report of known or suspected acts of misconduct or illegality or other violations of this Code.

VIII. WAIVERS OF THIS CODE

A waiver may be granted for any requested exception to the provisions of the Code or any violation thereof. Any waiver of the Code for executive officers or members of the Board may be made only by the Board or a committee of the Board. Any waiver for a director or an executive officer shall be disclosed as required by SEC and NASDAQ rules. Approvals of conflicts of interest made in accordance with the provisions of this Code will not be deemed a waiver of the provisions of this Code.

IX. AFTER YOUR SEPARATION FROM THE COMPANY

Surrender of Company Property and Assets

When a Covered Person's affiliation or employment with the Company ends, whether voluntarily or involuntarily, the Covered Person must return all Company assets in their possession or control, including, but not limited to, all confidential and proprietary materials, documents, and files related to the Company's business, customers, or suppliers. The Covered Person must surrender all originals and copies of such materials, whether maintained electronically or otherwise. The only exception to this rule is if the Head of Human Resources specifically approves the removal and retention of such material.

X. DISTRIBUTION AND MONITORING OF THE CODE OF ETHICS

A. New Covered Persons

Each new Covered Person is provided access to this Code of Ethics and an opportunity to read it and ask questions. Each new Covered Person must attest that they were given access to the Code of Ethics, have read it, understand it, and will comply with it.

B. Annual Attestation

Each year, every Covered Person will receive an updated copy of the Code of Ethics and must attest that they were given a copy of the Code of Ethics, have read it, understand it, will comply with it, and have not knowingly violated it during the prior year.

C. Directors Attestation

Each director, when first appointed and each year thereafter, will receive a copy of the current Code of Ethics and must attest that they were given a copy of the Code of Ethics, have read it, understand it, will comply with it, and have not knowingly violated it.

D. Reporting

Human Resources and Legal will manage the Code of Ethics. Legal will manage distribution and monitor attestations for each director. Human Resources will manage distribution and monitor attestations for all other Covered Persons.

The Head of Human Resources and the Legal Department will report to the Board each year regarding the Code of Ethics annual process.

Covered Person inquiries regarding the Code of Ethics should initially be directed to the Covered Person's manager, unless the manager is the source of the concern. The manager will consult with Human Resources as appropriate. Executive Officers should consult with the Head of Human Resources, the Chief Legal Officer, or the Chief Executive Officer. The Chief Executive Officer and any director should consult with the Executive Committee of the Board and may consult with the Chief Legal Officer.

XI. PERIODIC UPDATES OF THE CODE OF ETHICS

The Code of Ethics will be reviewed at least annually by both the Human Resources Department and the Legal Department and presented to the Board during the second quarter of each year. This review will help ensure that new or revised policies, activities, and laws have been properly updated or included in the Code when required. It is each Covered Person's responsibility to be mindful of any changes to the Code of Ethics as they may affect their responsibilities and duties at the Company.