FIRST FINANCIAL BANKSHARES

# Code of Business Conduct and Ethics

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| **Document Owner** | Chief Risk Officer |
| **Approval Body** | FFIN Board of Directors |
| **Regulatory and Industry Standard References** | |
| **Last Revision Date** | March 31, 2026 |
| **Approval Date** | April 28, 2026 |
| **Effective Date** | April 28, 2026 |

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**Message from our Chief Executive Officer**

To all Employees:

First Financial Bankshares, Inc. (FFIN) and its subsidiary companies (collectively and individually, the “Company”, “our Company”, or “Company”) are founded on our commitment to the highest ethical principles and standards. We value honesty and integrity above all else. Upholding these commitments is essential to our continued success.

The law and the ethical principles and standards that comprise this Code of Conduct must guide our actions. This Code is not intended to be a complete listing of detailed instructions for every conceivable situation. Instead, it is intended to help you develop a working knowledge of the laws and regulations that affect your job and the ethical principles that will guide your conduct.

Adhering to this Code is essential. I have personally taken the time to study it carefully and I encourage you to do the same.

One of our most valuable asset is our reputation. Complying with the principles and standards contained in this Code is the starting point for protecting and enhancing our reputation.

Thank you for your commitment!

David Bailey
Chief Executive Officer

**Important Phone Numbers**

| | | Direct Dial | Internal | Email |
|---|---|---|---|---|
| **Chief Executive Officer** | David Bailey | (325) 627-7111 | 3017111 | dbailey@ffin.com |
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| **Human Resources Director** | Josh Brown | (325) 627-7301 | 3017301 | jbrown@ffin.com |
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| **Chief Compliance Officer** | Mike Parker | (325) 627-7551 | 3017551 | mparker@ffin.com |
| **Anonymous Whistleblower Hotline** | | (866) 396-0557 | | |

## Introduction

All employees, officers, and directors, including advisory directors, of the Company (each an "Insider", and collectively the "Insiders") shall read and use this code of conduct ("Code") to ensure that each business decision follows our commitment to the highest ethical standards and the law. Adherence to this Code and to our other official policies is essential to maintaining and furthering our reputation for fair and ethical practices among our customers, shareholders, employees, and communities.

This Code summarizes certain laws and the ethical policies that apply to all Insiders. Several provisions in this Code refer to more detailed policies that either (1) concern more complex Company policies or legal provisions or (2) apply to select groups of individuals within our Company. If these detailed policies are applicable to you, it is important that you read, understand, and comply with them. If you question whether any detailed policy applies to you, contact your immediate supervisor, your applicable Company, Region, or Division President or CEO, or our Human Resources Director, Chief Financial Officer, Chief Risk Officer, General Counsel, or Chief Compliance Officer.

Situations that involve ethics, values, and violations of certain laws are often very complex. No single code of conduct can cover every business situation that you will encounter. Consequently, we have implemented the compliance procedures outlined in the sections of this Code entitled "Administration of the Code" and "Asking for Help and Reporting Concerns." The thrust of our procedures is when in doubt, ask. If you do not understand a provision of this Code, are confused as to what actions you should take in a given situation or wish to report a potential violation of the law or this Code, you should follow those compliance procedures. Those procedures will generally direct you to talk to either your immediate supervisor, your applicable Company or Region or Division President or our General Counsel or Chief Compliance Officer. There are few situations that cannot be resolved if you discuss them with these persons in an open and honest manner.

These procedures include a confidential reporting hotline accessible to all Insiders, and a strict non-retaliation policy for those who report concerns in good faith. Reports can be made anonymously. All reports will be investigated promptly and thoroughly.

When in doubt about a situation ask the following questions:

- Is it legal?
- Is it in accordance with Company policies?
- Does it reflect the Company's core values?
- Could it adversely impact the Company, or our customers or shareholders?
- Would it embarrass you, your family, or the Company if it appeared in court or the media?

Please note that this Code is not an employment contract and does not modify the employment relationship between us and you. We do not create any contractual or legal rights or guarantees by issuing this Code of Business Conduct and Ethics, and we reserve the right to amend, alter and terminate our policies at any time and for any reason.

## Compliance with Laws

First and foremost, our policy is to behave in an ethical manner and comply with all laws, rules, and government regulations that apply to our business. In particular, we are a financial holding company subject to extensive supervision by numerous federal banking regulators. Because we are committed to maintaining the safety and soundness of all areas of the Company, we take our obligation to comply with state and federal banking laws very seriously. These laws, and especially those dealing with our relationships with (and disclosures to) customers who hold accounts or request loans, are very complicated and cannot be completely summarized in this Code. Although we address several important legal issues in this Code, we cannot anticipate every possible situation or cover every issue in detail. It is your responsibility to know and follow the law and conduct yourself in an ethical manner. It is also your responsibility to report any violations of the law or this Code. You may report such violations by following the compliance procedures contained in the **Asking for Help and Reporting Concern** section of this Code.

The financial records of our customers and our relationships with our customers are confidential. Unless your job description authorizes you to make public disclosures, you may not divulge financial information or records of any customer to anyone outside our Company. To the extent required by law, we will cooperate with government agencies in their legitimate requests for information. If you receive a request from any third party to release information concerning our customers, you should forward that request to Deposit Operations or our General Counsel.

This confidentiality obligation extends beyond employment with the Company. All Insiders are required to maintain the confidentiality of customer information even after termination of employment, in accordance with applicable laws and regulations, including the Gramm-Leach-Bliley Act (GLBA). Unauthorized disclosure of confidential information may result in legal penalties and disciplinary action.

### *Antitrust Laws*

Antitrust laws are designed to ensure a fair and competitive marketplace by prohibiting various types of anticompetitive behavior. Some of the most serious antitrust offenses occur between competitors, such as agreements to fix prices or to divide customers, territories or markets. Accordingly, it is important to avoid discussions with our competitors regarding pricing, terms and conditions, costs, marketing plans, customers and any other proprietary or confidential information.

We cannot be a party to any unlawful agreements, whether oral or written. We cannot have informal discussions or exchange information with a competitor that could be construed in any way, shape or form to violate antitrust laws. If you believe that a conversation with a competitor enters an inappropriate area, end the conversation at once.

Whenever any question arises as to application of antitrust laws, you should consult with our General Counsel and your applicable Company, Regional, or Division, or Market President or CEO and any agreements with possible antitrust implications should be made only with their prior approval.

### *Anticorruption Laws*

Conducting business with governments is not the same as conducting business with private parties. What may be considered an acceptable practice in the private business sector may be improper or illegal when dealing with government officials. Improper or illegal payments to government officials are strictly prohibited. "Government officials" includes employees of any government anywhere in the world, even low-ranking employees or employees of government-controlled entities, as well as political parties and candidates for political office. If you deal with such persons or entities, you should consult with our General Counsel and

Chief Compliance Officer to be sure that you understand these laws before providing anything of value to a government official. For example, if you are associated with obtaining deposits from a public entity such as a city, county, or school district, you must not make any payment or subsidy to a government official, other than political contributions in accordance with political contribution laws.

If you are involved in transactions with foreign government officials, you must comply not only with the laws of the country with which you are involved but also with the U.S. Foreign Corrupt Practices Act. This act makes it illegal to pay, or promise to pay, money or anything of value to any non-U.S. government official for the purpose of directly or indirectly obtaining or retaining business. This ban on illegal payments and bribes also applies to agents or intermediaries who use funds for purposes prohibited by the statute. You must have approval from our General Counsel and Chief Financial Officer before making any payment or gift to a foreign government official.

*Anti-Money Laundering and Economic Sanctions*

Money laundering is the process of taking the proceeds of criminal activity and making them appear legitimate. Money laundering is generally accomplished in three steps:

- Placement of cash or other assets into the financial systems;
- Layering, by moving these assets around multiple accounts or institutions; and
- Integration of the assets back into the mainstream economy.

Money laundering can result from almost any crime, including fraud, drug trafficking, human trafficking, and terrorism. Our Financial Crimes Compliance Policy and related procedures are designed to comply with all applicable laws and regulations related to money laundering, terrorist financing, and economic sanctions. You are required to comply with these policies, procedures, and controls.

Specifically:

- Make sure you accurately complete all "know your customer" requirements.
- If your job requires more detailed knowledge of anti-money laundering, counterterrorist financing and sanctions rules, talk to your supervisor or our Chief Compliance Officer to receive and complete the necessary training.
- Be alert to and report any unusual or suspicious activity to your manager, the BSA staff responsible for anti-money laundering and sanctions compliance, our Chief Compliance Officer, or our Chief Risk Officer. Complete and submit a Suspicious Activity Information Form (SAIF).
- Complete all required compliance training on a timely basis.

**Conflicts of Interest**

All of us must be able to perform our duties and exercise judgment on behalf of our Company without influence or impairment, or the appearance of influence or impairment, due to any activity, interest or relationship that arises outside of work. Put more simply, when our loyalty to our Company is affected by actual or potential benefit or influence from an outside source, a conflict of interest exists. Be aware of any potential influences that impact or appear to impact our loyalty to our Company. In general, you should avoid situations where your personal interests conflict, or appear to conflict, with those of our Company.

Any time you believe a conflict of interest may exist, you must disclose the potential conflict of interest to your immediate supervisor, your applicable Company, Regional, Division, or Market President or CEO or our

General Counsel or Chief Compliance Officer.

It is not possible to describe every potential conflict of interest, but some situations that could cause a conflict of interest for employees and their immediate family members (not applicable to non-employee directors) include:

- Doing business with family members
- Having a financial interest in another company with whom we do business or which our bank customers compete against
- Assisting family or friends with account-related inquiries or transactions or with accessing their accounts, unless designated as a co-owner or authorized signer
- Taking a second job
- Managing your own business
- Serving as a director of another business
- Being a leader in some organizations
- Holding a political or public office, whether elected or appointed
- Diverting a business opportunity from our Company to another company
- Purchasing repossessed and foreclosed assets, or assets under management from our Company
- Obtaining loans from First Financial Bank.

*Doing Business with Family Members*

A conflict of interest may arise if an immediate member[1] of an employee's family works for a supplier, customer, or other third party with whom we do business. It also may be a conflict if an immediate member of an employee's family has a significant financial interest in a supplier, customer or other third party with whom we do business. A "significant financial interest" is defined below. Before doing business on our behalf with an organization in which an immediate member of an employee's family works or has a significant financial interest, an employee must disclose the situation to our General Counsel, Chief Compliance Officer and his or her applicable Company, Regional, Division, or Market President and discuss it with them. Document the approval if it is granted.

Employment of family members is restricted in accordance with the Company's Employee Handbook policy entitled "Employment of Relatives/Nepotism."

*Ownership in Other Businesses*

Our investments can cause a conflict of interest. In general, you should not own, directly or indirectly, a significant financial interest in any company that does business with us or seeks to do business with us, including customers and vendors. You also should not own a significant financial interest in any of our competitors.

Two tests determine if a "significant financial interest" exists:

- You or an immediate member of your family owns more than 10% of the outstanding stock

[1] An immediate family member means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, and any person (other than a tenant or employee) sharing the household of an Insider.

of a business or you or an immediate member of your family has or shares discretionary authority with respect to the decisions made by that business, or

- The investment represents more than 5% of your total assets or of an immediate family member's total assets.

If you or an immediate member of your family has a significant financial interest in a company with whom we do business or propose to do business, that transaction must be approved by the Company's or the applicable Subsidiary Board of Directors prior to the transaction.

Notwithstanding the foregoing, non-employee directors of our Company and their dependent family members may have significant financial interests in or be affiliates of suppliers, customers, competitors and third parties with whom we do business or propose to do business. However, a director must:

- disclose any such relationship promptly after the director becomes aware of it,
- remove himself or herself from any Board discussion or decision that directly impacts the relationship between our Company and any such company, and
- obtain prior approval of the Company's or the applicable Subsidiary Board of Directors for any transaction of which the director is aware between our Company and any such company.

*Outside Employment*

Sometimes our employees desire to take additional part-time jobs or do other work after hours, such as consulting or other fee-earning services. This kind of work does not in and of itself violate our Code. However, the second job must be strictly separated from your job with us and must not interfere with your ability to devote the time and effort needed to fulfill your duties to us as our employee. You cannot engage in any outside activity that causes competition with us or provides assistance to our competitors or other parties (such as suppliers) with whom we regularly do business. You should avoid outside activities that embarrass or discredit us. Outside work may never be done on Company time and must not involve the use of our supplies or equipment.

Before engaging in a second line of work, you should disclose your plans to your immediate supervisor or your applicable Company, Regional, Division, or Market President who, with the consultation of Human Resources staff, will confirm that the proposed activity is not contrary to our best interests and obtain their approval.

*Service on Boards/Holding an Elected or Appointed Political Office*

We encourage and empower our officers and employees to be involved with civic, cultural, religious, and community organizations to improve the quality of life in the communities we serve. We discourage our people from assuming political positions because of the controversial situations and the conflicts of interest that may arise with customers and our business.

For employees and their dependent family members (not applicable to non-employee directors), serving as a director of another corporation may create a conflict of interest. Being a director or serving on a standing committee of some organizations, including government agencies, also may create a conflict.

Before accepting an appointment to the board or a committee of any organization whose interests may conflict with our Company's interests, or an elected or appointed political position, you must discuss it with your immediate supervisor, your applicable Company, Regional, Division, or Market President or CEO, and obtain their prior approval. If a Company, Regional, Division, or Market President or CEO is considering any such position, they must receive prior approval from the Company's Executive Management team.

*Business Opportunities*

Business opportunities relating to the kinds of products and services we usually sell or the activities we typically pursue that arise during your employment or through the use of our property or information belonging to the Company. Similarly, other business opportunities that fit into our strategic plans or satisfy our commercial objectives that arise under similar conditions also belong to the Company. You may not direct these kinds of business opportunities to our competitors, to other third parties, or to other businesses.

*Repossessed and Foreclosed Assets and Assets Under Management*

The Company may not sell or make available in any way to employees, officers, directors, or their immediate family members any Company assets or third-party assets under management by our Company.

*Loans*

From time to time, our employees, officers (except for designated Regulation O executive officers), directors, principal shareholders and their related parties may wish to borrow from the bank for their credit needs. Under appropriate circumstances, these parties can be among our valued customers. However, we must exercise great care in making or renewing loans to them, granting lines of credit or otherwise extending (or arranging for the extension of credit) in any manner whatsoever. When we extend credit to employees or insiders, we must do so:

- at arm's length,
- on substantially the same terms (including interest rates and collateral), and following credit underwriting procedures that are no less stringent than usual, and
- in a way that does not involve more than the normal risk of repayment or other unfavorable features to us.

Extensions of credit to our employees who are not Regulation O insiders (including Board-designated Executive Officers and directors) must be approved by our loan committee in accordance with existing loan policy. If a Company Director or any of their affiliates or dependent family members seek an extension of credit from First Financial Bank, the First Financial Bank Board of Directors must approve the transaction per regulatory requirements, with all interested Directors abstaining from the Board's deliberations, recusing themselves from voting, and leaving the room during discussion and voting. We must retain all records of loans to affiliated persons, as required by law, and we may occasionally be required to make public disclosure of these loans. There are additional lending criteria we must meet when extending credit to certain insiders.

Presidents, executive vice presidents, and senior vice presidents who have not been designated as Regulation O executive officers and their dependent family members are prohibited from borrowing in their own Region but may borrow from other Regions. Borrowing is defined as an extension of credit, including unfunded loan commitments (other than credit cards), for which the officer is contractually liable as maker, co-maker, co-signer, or guarantor.

Board-designated Executive Officers may temporarily borrow from the subsidiary bank in accordance with the bank's Regulation O policy with Board approval.

**Protecting Confidential Information**

Trust is essential to our business success. Customers, suppliers, and companies with whom we do business trust us to be good stewards of their information, whether that information relates to financial, personal, or business matters.

Confidential information is information that you acquire, receive, learn, create, develop, or have access to because of your employment at our Company and that is not made available to the public. The loss or unauthorized disclosure or access to confidential information could result in harm to our Company, customers, business partners, suppliers, or employees. This includes personal and non-public information about our employees, customers, and partners and their business. It can be written, oral, or electronic, and includes a wide variety of data, from technology applications, business strategies, and customer lists to credit procedures, customer preferences, and personnel information. Confidential information may pertain to our Company itself, or to the customers, suppliers, or companies with whom we do business.

Assume that all information you have about our Company and its business (including information concerning past, present and prospective customers, business partners, suppliers, directors and employees) is confidential.

*Disclose confidential information only on a need-to-know basis*

You have a duty to protect confidential information and to take precautions before sharing it with anyone, inside or outside the workplace. A legitimate business need for knowing or having access to confidential information must exist before that information may be shared or received. Need-to-know is based on whether a person needs the information in the normal exercise of their employment or duties. Do not share confidential information with friends, family, former employees, or third parties. Do not discuss confidential information in places where others could hear you. Do not access or use confidential information, and don't disclose it to fellow employees who are not involved in providing services to the owner of the information, unless you are authorized and legally permitted to do so. Finally, do not send confidential information, including internal communications such as intranet postings, outside our Company (including sending information to your own personal email address), unless permitted to do so under applicable law, regulations, and Company policy or procedures.

Before disclosing confidential information:

- Be sure you are permitted to do so, under applicable law, regulations, and Company policies and procedures.
- Disclose it only to those who are authorized to receive it and who need to know it to do their job.
- Limit the amount of information shared to what is required to achieve the stated business purpose.
- Obtain a Company approved confidentiality agreement, nondisclosure agreement or other agreement with appropriate Company approved privacy clauses, if required, when sharing confidential information with someone outside our Company.
- Make sure the recipient knows that the information is confidential, and any restrictions related to its use or dissemination.

The restriction on disclosing confidential information is not intended to prevent employees from reporting to our Company's management or directors, the government or a regulator, employees' attorneys, or a court under seal, concerns of any potential or actual violation of this Code; or to prevent employees from reporting retaliation for reporting such concerns. It's also not intended to prevent employees from responding truthfully to questions or requests from the government, a regulator or in a court of law. Nothing in this Code should be interpreted to prevent employees from engaging in activities that are protected under laws and regulations that allow employees to discuss or disclose compensation information.

*Safeguard confidential information post-employment*

Your duty to protect confidential information extends beyond your employment with the Company. The same standard of care over confidential information remains in effect after you leave the employment of the Company. Sharing or using confidential information that you acquired, received, learned, created, developed, or had access to because of your employment at our Company is prohibited after your employment or service to the Company ends.

*Safeguard confidential information of prior employers*

Your responsibility to protect confidential information also applies to work you may have done before coming to the Company. Sharing confidential information from a former employer is unethical and can also expose you and the Company to legal liabilities. Do not disclose any confidential information of a prior employer unless it has already been made public through no action of your own. Destroy confidential or proprietary information that you have downloaded, copied, duplicated, or removed from your prior employer.

*Social Media and other online activities*

Be sensitive to the impact of comments made over the internet through public forums such as social media, chat rooms, bulletin boards, and other public forums. In such forums, you may not post nonpublic information about the Company including comments about our products, stock performance, operational strategies, financial results, customers, or competitors, even in response to a false statement or question. This applies whether you are at work or away from the office. Your employment postings may include the fact that you work for the Company, your job title, a summary of your job description, and your office location, but may not contain nonpublic information. Refer to the Social Media Policy for additional information

Our Company owns all e-mail and instant messages that are sent from or received through the Company's systems. The Company may monitor your messages and may be required to disclose them in the case of litigation or governmental inquiry.

**Gifts and Entertainment**

The Company is dedicated to fair and impartial treatment of all people and firms with whom we do business. Therefore, our employees, including dependent family members, must not give or receive gifts, entertainment or gratuities that could influence or be perceived to influence business decisions. Misunderstandings can usually be avoided by conduct that makes clear that our Company conducts business on an ethical basis and will not seek or grant special considerations.

*Accepting Gifts and Entertainment*

You should never solicit a gift or favor from those with whom we do business. You may not accept gifts of cash or cash equivalents or any gift greater than $250 in value.

You may accept novelty or promotional items, or modest gifts related to commonly recognized occasions, such as a promotion, holiday, wedding, or retirement, if:

- this happens only occasionally,
- the gift was not solicited,
- disclosure of the gift would not embarrass our Company, or the people involved, and
- the value of the gift is reasonable and does not exceed $250

You may accept an occasional invitation to a sporting activity, entertainment or meal, if:

- you are invited and have not solicited or required the customer to provide such invitation or tickets,
- there is a valid business purpose involved,
- this happens only occasionally, and
- the activity is of reasonable value and not lavish.

*Giving Gifts and Entertaining*

Gifts of nominal value and reasonable entertainment for customers, potential customers, and other third parties with whom we do business are permitted. However, any gift or entertainment must

- support our Company's legitimate business interests,
- be reasonable and customary, not lavish or extravagant, and
- not embarrass our Company or the recipient if publicly disclosed.

Under no circumstances can any bribe, kickback, or illegal payment or gift of cash or cash equivalents be made. Also, special rules apply when dealing with government employees. Anticorruption laws are discussed in this Code in the "Compliance with Laws" section.

**Fair Dealing**

We have built a reputation as a trustworthy and ethical member of our community and our industry. We are committed to maintaining the highest levels of integrity and fairness within our Company. When we fail to negotiate, perform or market in good faith, we may seriously damage our reputation and lose the loyalty of our customers. You must conduct business honestly and fairly and not take unfair advantage of anyone through any misrepresentation of material facts, manipulation, concealment, abuse of privileged information, fraud or other unfair business practices.

You may not use information that you have obtained from the Company to give you a competitive advantage over a competitor or to structure a business transaction.

**Securities Laws and Insider Trading**

For our policy related to securities laws and insider trading, you should refer to the Insider Trading Policy.

**Responding to Inquiries from the Press and Others**

Our Company is subject to laws that govern the timing of our disclosures of material information to the public and others. Only certain designated personnel may discuss our Company with the news media, securities analysts and investors, and other social media and online sources. All inquiries from outsiders regarding financial or other information about our Company should be referred to our Chief Executive Officer (refer to the Social Media Policy and Disclosure Policy for additional information).

**Political Activity**

We will fully comply with all political contribution laws. Our funds and facilities may not be used for contributions of any kind to any political party or committee or to any candidate or holder of any government position (national, state or local) unless such contribution is permitted by law and complies with our Company policy. Please contact our General Counsel or your applicable Company, Regional, Division, or Market President or CEO to determine whether a specific Company contribution is permitted.

It is against our policy for you to solicit funds from Company employees on behalf of a political candidate during the workday. It is also against our policy to reimburse an employee for any political contributions or expenditures. Outside normal office hours, you are free to participate in political campaigns on behalf of candidates or issues of your choosing, as well as make personal political contributions including to our banking industry political action committees. We allow officers and directors to solicit funds for banking industry political action committees from our employees, officers, and directors.

**Safeguarding Corporate Assets**

We have a responsibility to protect Company assets entrusted to us from loss, theft, misuse, and waste. Company assets and funds may be used only for business purposes and may never be used for illegal purposes. Incidental personal use of telephones, fax machines, copy machines, personal computers, e-mail, and similar equipment is generally allowed if it is occasional, there is no significant added cost to us, it does not interfere with your work responsibilities, and is not related to an illegal activity or outside business. If you become aware of theft, waste, or misuse of our assets or funds or have any questions about your proper use of them, you should speak immediately with your immediate supervisor, your applicable Company, Regional, Division, or Market President or CEO, our General Counsel, or Chief Risk Officer.

**Accuracy of Company Records**

All information you record or report on our behalf, whether for our purposes or for third parties, must be done accurately and honestly. All our records (including accounts and financial statements) must be maintained in reasonable and appropriate detail, must be kept in a timely fashion, and must appropriately reflect our transactions. Falsifying records or keeping unrecorded funds and assets is a severe offense and may result in prosecution or loss of employment. Payments can only be used for the purpose described in the supporting document.

Information derived from our records is provided to our shareholders and investors as well as government agencies. Thus, our accounting records must conform not only to our internal control and disclosure procedures but also to generally accepted accounting principles and other laws and regulations, such as those of the Internal Revenue Service and the Securities and Exchange Commission. Our public communications and the reports we file with the Securities and Exchange Commission and other government agencies should contain information that is full, fair, accurate, timely, and understandable in light of the circumstances surrounding disclosure.

Our internal and external auditing functions help ensure that our financial books, records, and accounts are accurate. Therefore, you should provide our accounting department, internal auditing staff, the Audit Committee of our Board of Directors (the "Audit Committee"), and independent public accountants with all pertinent information that they may request. We encourage open lines of communication with our Audit Committee, accountants, and auditors and require that all our personnel cooperate with them. It is unlawful for you to fraudulently influence, induce, coerce, manipulate, or mislead our independent public accountants for the purpose of making our financial statements misleading.

If you are unsure about the accounting treatment of a transaction or believe that a transaction has been improperly recorded or you otherwise have a concern or complaint regarding an accounting matter, our internal accounting controls, or an audit matter, you should confer with our Chief Financial Officer, or you may submit your concern, on an anonymous basis, to the Chair of our Audit Committee by calling the toll free number 1-866-396-0557 (See procedures to be followed under the section entitled "Asking for Help and Reporting

Concerns”).

## Record Retention

Our records should be retained or discarded in accordance with our record retention policies and all applicable laws and regulations. From time to time, we are involved in legal proceedings that may require us to make some of our records available to third parties. Our General Counsel will assist in releasing appropriate information to third parties and provide you (or your immediate supervisor) with specific instructions. It is a crime to alter, destroy, modify, or conceal documentation or other objects that are relevant to a government investigation, or otherwise obstruct, influence or impede an official proceeding. The law applies equally to all our records, including formal reports as well as informal data such as e-mail, instant messages, expense reports, and other types of internal communications.

If the existence of a subpoena, pending government investigation, or other legal proceeding is known or reported to you, you should immediately contact our General Counsel, and you must retain all records that may pertain to that matter. It is a crime for officers, directors, or employees of a financial institution to disclose the existence of, content of, or response to a subpoena to a customer whose records are sought, or to the target of the investigation. A direct or indirect disclosure to a customer or “any other person” named in the subpoena made with or without the intent to obstruct a judicial proceeding may be punishable by incarceration.

## Administration of the Code

*Distribution*

All directors, including Regional directors, will receive a copy of this Code when they become a director of the Company. All officers and employees will be provided with a copy to read upon employment. A copy of the Code and updates are posted on the Company’s intranet website. All directors and employees are required to acknowledge receipt and acceptance of the Code annually.

*Training, Acknowledgement, and Acceptance*

All employees are required to complete ethics training, acknowledge their understanding of this policy, and accept the terms of this policy annually. Directors and Regional directors are required to acknowledge their understanding of this policy and accept the terms of this policy annually.

*Role of Supervisors and Officers*

Supervisors and officers have important roles under this Code and are expected to demonstrate their personal commitment to this Code by fostering a workplace environment that promotes compliance with the Code and by ensuring that employees under their supervision participate in our Company’s compliance training programs.

*Reporting Violations*

All employees are obliged to report violations of this Code or the law and to cooperate in any investigations into such violations. See “Asking for Help and Reporting Concerns” for procedures to be followed for reporting possible violations of this Code. We prefer that you give your identity when reporting violations, to allow the Company to contact you in the event further information is needed to pursue an investigation, and your identity will be maintained in confidence to the extent practicable under the circumstances and consistent with enforcing this Code. However, you may anonymously report violations as described below.

*Investigations*

We will initiate a prompt investigation following any credible indication that a breach of law or this Code may have occurred. We will also initiate appropriate corrective action as we deem necessary, which may include notifying appropriate authorities.

*Disciplinary Action*

If you violate any provision of this Code, you may be subject to disciplinary action, up to and including discharge. Please be aware that we may seek civil remedies from you and if your violation results in monetary loss to us, you may be required to reimburse us for that loss. If you are involved in a violation, the fact that you reported the violation, together with the degree of cooperation displayed by you and whether the violation is intentional or unintentional, will be given consideration in our investigation and any resulting disciplinary action.

*Approvals*

Any request for an approval under this Code from any employee or non-executive officer must be submitted in writing to your applicable Company, Region, or Division, or Market President who has authority to make such decision. Any request for approval under this Code from a director or an executive officer must be submitted in writing to the Chief Executive Officer, Chief Financial Officer, General Counsel, or Lead Director for submission to the Company's Board of Directors which has authority to make such decision. The approval for a Director or Executive Officer will be promptly disclosed to the extent required by law or regulation.

**Asking for Help and Reporting Concerns**

We take this Code seriously and consider its enforcement to be among our highest priorities. We also acknowledge that we operate in a complex environment. That is why we encourage open communication. When in doubt, ask. Whenever you have a question or concern, you are unsure about the appropriate course of action, or if you believe that a potential violation of the law or this Code has occurred:

- Talk with your immediate supervisor or applicable Company, Region, Division, or Market President who may have the information you need or may be able to refer the matter to an appropriate source, including our General Counsel.
- If you are uncomfortable talking with your immediate supervisor or your applicable President or CEO, you may also contact one of the following: managers in our Company with whom you feel comfortable, our Human Resources Director, Chief Executive Officer, Chief Financial Officer, Chief Risk Officer, General Counsel, or Chief Compliance Officer.
- In addition, if you have concerns or complaints about accounting or audit matters or our internal accounting controls or any other matter, you may confer with your immediate supervisor, the controller associated with your Company or Banking Region, or our Chief Financial Officer, or you may submit your concern or complaint, on an anonymous basis, to the Chair of the Audit Committee by calling the toll free number 1-866-396-0557.

*Sharing concerns without fear of retaliation.*

Don't be afraid to speak up and promote an ethical culture. We are counting on you to do so. You are our Company's eyes and ears, and we rely on you to tell us about any suspected misconduct so that we can take action.

We strictly prohibit intimidation or retaliation against anyone who makes a good faith report about a potential or actual violation of the Code or any Company policy or procedure, or any law or regulation. We also strictly prohibit any intimidation or retaliation against anyone who assists with any inquiry or investigation of any such violation. Be assured that the information you provide will be handled discreetly and shared only with those we have a need to inform, such as regulators and those who are involved in investigating, resolving and, if necessary, remediating the issue. Employees who have concerns about or are aware of possible retaliatory action must report it, either to their manager, Human Resources representative, our General Counsel, or the Whistleblower Hotline.

**Other Applicable Policies, Procedures, and Guidance**

This Code is not exclusive. As an Insider of the Company, you should refer to other Company policies, procedures, and guidance for more information. These policies, procedures, and guidance include, but are not limited to, the Employee Handbook; Credit Policy; Insider Borrowing and Transaction Policy (Reg O); Acceptable Use Policy; Financial Crimes Compliance Policy; Consumer Complaints Standard; Social Media Policy; Unfair, Deceptive, or Abusive Acts or Practices Policy; Compliance Training Policy; Community Reinvestment Act (CRA) Policy; Equal Employment Opportunity Act Policy; and Fair Lending Policy.

## Revision History

| Revision Date | Revision Notes | Author |
|---|---|---|
| April 11, 2025 | Included General Counsel as a party throughout and added clarifying language | Goodrich and Roewe |
| March 31, 2026 | Grammatical edits. Updated policy references. Added caution against disclosing subpoenas. | Goodrich and Roewe |
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