



CODE OF BUSINESS CONDUCT AND ETHICS

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.

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 notice, warning or cause, 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.

I. 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 moral, ethical and social responsibility. They are principles for human performance, which — combined with our efforts to provide high standards for product and service performance — have helped build the Company’s reputation among the communities and clients 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 Security 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;
- protection of the Company’s legitimate business interests, including opportunities, assets and confidential information;
- deterrence of wrongdoing; and
- accountability for adherence to the Code.

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 directors, officers and employees 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. The more detailed policies and procedures provided in the Company’s employee manuals and other policies and procedures are separate requirements.

The Board recognizes that no code of business conduct and ethics can describe every circumstance that might confront directors, officers and employees with ethical and legal challenges. Therefore, the Board expects that, in addition to complying with the Code and applicable laws, rules and regulations, all directors, officers and employees will observe the highest standards of business and personal ethics in discharging their assigned duties and responsibilities. If you are a manager or supervisor, you have the added responsibility of upholding this Code as an example to the team you oversee. We rely on you to create an open and honest working environment in which team members feel comfortable asking a question about the Code or raising a concern about misconduct. Ethical behavior must be modeled and demonstrated by example.

As a team member of the Company, you must never violate this Code. Rules of the Code will be enforced through human resources procedures, audit and examination. Team members who violate the standards in this Code will be subject to disciplinary action, including termination and, to the extent violations breach other civil or criminal laws, possible civil or criminal penalties. These consequences may also apply to any team member who condones or otherwise knowingly or willfully permits misconduct of a fellow team member.

II. STANDARDS OF CONDUCT

1. Fair Dealing

The Company intends to succeed and grow through honest business competition. It is the Company’s policy that it competes for business only on the basis of the quality and price of the

services it offers, the overall benefits and the relationship with its 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 employees. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

2. Honest, Ethical and Candid Conduct

Each Covered Person should always be mindful of the Company's prominence and reputation in the community. Banking is a business based on mutual trust, and we demand absolute honesty in all of the Company's affairs, internally and externally. Accordingly, each Covered Person must conduct the Company's business in a way that fully justifies the continued goodwill and trust of its customers and prospective customers. It is also extremely important that you conduct your personal affairs in such a way as to avoid discredit or embarrassment to 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;
- adhere to a high standard of business ethics; and
- avoid conduct that would or could create an unsafe and unsound condition for the Company.

3. Conflicts of Interest

A "conflict of interest" occurs when an individual's personal interest interferes or appears to interfere with the interests of the Company or the customers being served by that individual. A conflict of interest can arise when you take actions or have interests that may make it difficult to perform your work for the Company or to service a customer objectively and effectively. For example, a conflict of interest would arise if a Covered Person, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.

You should examine your own activities and those of your close family relations to be sure that no condition exists that may create an unlawful or unethical situation or even the appearance of a conflict of interest with respect to the Company's business. With the foregoing general

observations in mind, you are expected to take steps to avoid putting yourself in a situation in which you or your family's financial interests and obligations may potentially conflict with your duties and responsibilities at the Company and its customers. Some conflict of interest situations may 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.

Anything that would present a conflict for you would likely also present a conflict if it were related to a member of your family. We encourage you to seek guidance from your manager and the human resources or legal departments when you have any questions or doubts.

You must not represent the Company in any transaction in which you may derive a benefit. To avoid possible conflicts of interest, loan applications submitted to you 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.

You must not approve your own loans, act as officer on any account on which you are a signatory, process your own transactions, or authorize refunds on any account on which you 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.

You must not accept business opportunities from persons doing business or seeking to do business with the Company if those opportunities are made available to you because of your position with the Company. You must never use your position with the Company to influence public officials

or others for your personal benefit. Likewise, you must not use your employment with the Company as leverage to gain favors from customers or suppliers.

Service to the Company should never be subordinated to personal gain and 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 that are 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 potential conflicts of interest as required under the rules of the SEC when required and when 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 General Counsel if not previously approved as described in the following paragraph.

The Company is required to conduct an appropriate review of all related person transactions (as defined in the Item 404, Regulation S-K policy for potential conflicts of interest) on an ongoing basis, and all such transactions must be approved by the Audit Committee of the Board. Any transaction or relationship that is approved as required under this paragraph complies with this Code, and such approval shall not be regarded as a waiver of the Code. We will abide by the securities laws that govern conflicts of interest by our executive officers and directors. As a result, the actions or relationships that will be considered conflicts with respect to our executive officers and directors are only those that meet the requirement for disclosure in our periodic filings with the SEC pursuant to Item 404 of Regulation S-K, referred to as related party transactions. Such related party transactions must be approved by the Audit Committee as required by applicable laws and regulations, and provided such approval is obtained, such approval shall not be deemed a waiver of this Code.

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. Selection of Vendors, and Purchasing Goods and Services

While there is subjectivity in the selection process, it is the Company's policy that the selection should always be predicated on the quality, the ability of the vendor, service or product to meet the Company's need, and competitive pricing for value received. You must abide by the Company's vendor management policy in the selection and retention of vendors. Any irregularities in the procurement of goods and services are contrary to the Company's ethical standards and may be illegal in some cases. Various federal and state laws 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. If you have any concern about the propriety of such a payment, you must consult with Human Resources.

6. 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; and
- 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.

7. Compliance with Laws and Regulations

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

The Company has implemented an enterprise-wide compliance program designed to comply with applicable laws and regulation related to bribery corruption and anti-money laundering. Bribery is the offer, promise, or payment of cash, gifts, excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Bribery is prohibited regardless of the amount, whether or not the other party is a government official and regardless of whether you believe that the bribe will somehow benefit the Company or you. The Company requires that all employees comply with the Company's Anti-Money Laundering and Treasury's Office of Foreign Assets Control Policy. The purpose of this Policy is to outline the requirements of the various anti-money laundering and counter-terrorist financing laws and regulations (collectively, the "Bank Secrecy Act/Anti-Money Laundering Laws and Regulations") and Treasury's Office of Foreign Assets Control ("OFAC") laws and to provide management with direction to comply with these requirements. The Company regularly assesses the risks associated with its business, including the risk of potential corruption or bribery in the environments where we do business, and we have designed our management systems to respond accordingly.

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 employees, officers and directors 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.

Trading on Insider Information Prohibited

It is against Company policy and in many circumstances illegal for any director, officer or employee to profit from undisclosed information relating to the Company or any other company. You must not purchase or sell securities of the Company or any company based on material information that has not been made public. The Company's policies and procedures regarding insider trading are disclosed in the Company's Insider Trading Policy.

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, and 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 employee.

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 employees 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 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 offenses 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 or 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 part of the Policy Manual.

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.

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.

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 employee. In addition, a Covered Person may not 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 employee.

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

- i. Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those between the parents, children or spouse of a Company official) where the circumstances make it clear that it is those relationships rather than the business of the Company concerned which are the motivating factors.
- ii. 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.
- iii. 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.
- iv. Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars and similar items.
- v. Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers.
- vi. 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.
- vii. 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.

Facilitation Payments

Facilitation payments are payments made to facilitate or expedite a normal governmental function, such as to expedite processing paperwork or issue permits. This type of practice leads to a vicious circle by undermining the ethical values of the Company. Facilitation payments are thus considered as corruption and are strictly prohibited. If you have concerns whether a payment may be a facilitation payment, please contact the Company's General Counsel.

11. 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.

12. Confidentiality

In carrying out the Company's business, Covered Persons often learn confidential or proprietary information about the Company, its suppliers or customers. Our customers rely on us to use prudence when managing their financial affairs, funds and property. Directors, officers and employees must maintain the confidentiality of all information so entrusted to them, except when disclosure is expressly authorized or required or permitted by law. Confidential information includes all nonpublic information that might be of use to competitors or harmful to the Company, our team members and our customers, if disclosed; it also includes information that suppliers and customers have entrusted to the Company. You may not provide any former Company employee with nonpublic information. It is important to note that the obligation to preserve confidential information continues even after employment or service as a director ends. For more detail, please refer to the Company's Data Classification and Information Protection Policy and Privacy Policies.

Customer Privacy of Information

The preservation of customer confidences and privacy are essential to the Company's business and reputation. The Company is also subject to specific laws and regulations that govern its handling

of personal information it maintains regarding customers who are natural persons. 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, and is 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.

Except as permitted below, you shall not knowingly:

- Reveal a confidence or secret regarding a customer of the Company or the customer’s business with the Company.
- Use a confidence or secret of a customer or the Company to the disadvantage of the customer or the Company.
- 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.

You may reveal:

- Confidences or secrets with the written consent of the customer(s) affected, or the Company, but only after a full disclosure to them.
- 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 General Counsel).
- Confidences or secrets necessary to prevent a crime.
- 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 General Counsel.
- 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.

BSA/AML Governmental Related Requests for Information

Pursuant to federal law, the Company's Board of Directors 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.

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.

If a representative of any governmental agency requests an interview with any Company personnel, or seeks data or copies of documents or seeks access to files, such request must be referred to the General Counsel'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 employee'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.

Contacts with the News Media

It is the Company's policy to maintain good relations with local and national news media and it tries to accommodate media inquiries. However, there is much information concerning the Company that should not be made available to the public. This includes information about personal banking customers, corporate customers, specific banking deals, proprietary products and programs, and/or other information that may be valuable to a competitor. The Company's marketing team is tasked with delivering official responses for the Company. Should the press reach out to you for an official comment by the Company on any matter, direct their inquiries to the Chief Marketing Officer.

10. Protection and Proper Use of Company Assets

All Covered Persons are expected to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability.

Our property, such as office supplies, computer equipment and software, records, customer information, and the Company's name and logo, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. The Company retains the

right to access, review, monitor and disclose any information transmitted, received or stored using our electronic equipment, with or without your knowledge, consent or approval. Any misuse or suspected misuse of the Company's assets, including fraud or theft, needs to be immediately reported as set forth in this Code.

The obligation of directors, officers and employees 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, salary information 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.

E-mail 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 policies of the Company so long as such use does not interfere with the efficiency of the Systems and does not interfere or disrupt with 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, or similar forums will be treated as the equivalent of engaging in public communications. Internet communications by or between Company personnel are in some cases also the equivalent of public communications, depending on the number of addresses or the presence or absence of security measures taken to protect such communications. Thus, any disclosure of significant information about the Company or its business in any of these forums or contexts will be subject to the restrictions and limitations set forth in this Code of Ethics. This policy does not apply to nonsupervisory employees who speak, write or communicate with fellow employees or others about their wages, benefits or other terms or conditions of employment during nonworking time (*i.e.*, before or after the employee's scheduled start or end 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 employees from Company premises or using Company equipment or assets, as it deems appropriate. Employees should have no expectation of privacy with respect to their use of the Company's Systems or Internet portal.

You are expected to remain familiar with the Company's policies on electronic communications, including your use of e-mail and the internet, which are set forth in the Technology Use Agreement. You should contact the Head of Human Resources with any questions you may have regarding the Company's information technology or policies regarding electronic communications or other technology.

11. Loan 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.

12. Personal Investments

Covered Persons of the Company, by the nature of their positions, must be particularly circumspect regarding investments that may appear improper to customers, regulatory authorities or the public. You should consult with our Chief Executive Officer or Chief Financial Officer if you have or are considering any investments that might have even an appearance of impropriety.

You should avoid entering into transactions in which it may appear that you are improperly benefiting from your relationship with the Company. This applies also to investments by members of your immediate family.

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 an employee who does not possess confidential information about that company.
- An interest in a company for which you are the account officer.

13. 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](#).

14. Diversity and Inclusion

The Company is committed to creating a professional environment that is diverse, inclusive and accessible and empowers all of our employees to succeed and achieve their goals. The Company is dedicated to building a more equitable world in our everyday practices by embracing the values and diversity of our employees, free of conscious and unconscious bias. The Company stands firm in its view that LGBTQ+ people should be ensured basic equal rights and live safely and openly. The Company provides annual training for our employees on conscious and unconscious bias. To ensure we meet the web accessibility and usability needs of all our customers, on an annual basis, we engage an independent firm to perform an American Disability Act (ADA) corporate website accessibility audit to certify we continuously meet ADA requirements.

15. Health and Safety

The Company upholds all OSHA regulations and other applicable laws for workplace safety.

16. 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 employee 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 employees so they may continue to improve their work environment as well as the service the Company provides its customers and clients. For more details, please refer to the Company's Human Rights Statement located [here](#).

III. REPORTING AND ENFORCEMENT

Upon hiring or appointment, each Covered Person must attest that he/she has read and understood the Company's Code. In addition, each Covered Person must attest annually to adherence to the Code.

If you have a concern regarding conduct that you believe to be a violation of a law, regulation or Company policy, or you are aware of questionable legal, financial or accounting matters, or simply

are unsure whether a situation violates any applicable law, regulation or Company policy, including this Code, please:

- Discuss the situation with your manager, or another manager with whom you feel comfortable.
- You may also contact: the Head of Human Resources, the Company's General Counsel, or the Chair of the Audit Committee of the Board.

In the alternative, you may report this information by calling our confidential Ethics Hotline, which is available 24/7. This Employee Hotline is intended to give employees a safe environment in which they may anonymously communicate with management and the Audit Committee of the Board of Directors. To help assure privacy and anonymity, the Company has outsourced the Employee Hotline to a third-party vendor.

You can call the Ethics Hotline toll-free at 855-375-2300.

Access to information from the Employee Hotline is limited to the Company's Chief Executive Officer, Head of Human Resources, the General Counsel, the Director of Corporate Security & Fraud Investigation, the Chief Risk Officer, Chief Audit Executive and to the Audit Committee in order to protect the confidentiality of the communication. The Employee Hotline is intended to allow Senior Management and the Audit Committee to follow up on the issues raised, while providing confidentiality to the individual that provided the information through the Employee Hotline. In order to ensure that a fair investigation can be conducted, any complaint made through the Employee Hotline that involves the Company's Chief Executive Officer, Head of Human Resources, the General Counsel, Chief Risk Officer, Chief Audit Executive or the Director of Corporate Security & Fraud Investigation will not be forwarded to that person.

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 (and with consultation with in-house or outside corporate/securities counsel, if necessary or appropriate).

In order to best solve the issues raised, if you are asked to participate in an appropriately authorized internal or external investigation, you must:

- Cooperate fully.
- Provide accurate and comprehensive information within your knowledge.
- Do not withhold, tamper with, or fail to communicate relevant information within you 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.

We expect you to do your best to comply with this Code. You are personally responsible for any misconduct, including improper or illegal acts committed by you during your relationship with the Company. It is important that you stay vigilant to ensure there are no violations of this Code by anyone. Do not stay silent in the face of a potential violation. If you have knowledge of a potential violation and fail to report it via the process set forth above, you too may be subject to disciplinary action under this Code.

All employees, directors and executive officer must cooperate with any investigation regarding an alleged violation of the Code.

IV. NO RETALIATION

The Board believes it to be in the best interests of the Company that the directors, officers and employees of the Company 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 director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code.

V. 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. 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.

VI. AFTER YOUR SEPARATION FROM THE COMPANY

A. Surrender of Company Property and Assets

When your affiliation or employment with the Company terminates, you must return all valuable assets of the Company in your possession or control, including all confidential and proprietary materials, documents and files related to the Company's business, customers or suppliers. You 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 your removing and retaining such material.

B. Distribution and Monitoring of the Code of Ethics

New Employees – Each new employee of the Company is provided a copy of this Code of Ethics and an opportunity to read and understand it. Each new employee must also attest that he or she was given a copy of the Code of Ethics, has read it, understands it, and will comply with it. (Appendix 1)

Annual Attestation – In the second quarter of each year, every Covered Person will receive an updated copy of the Code of Ethics and must attest that he or she was given a copy of the Code of Ethics, has read it, understands it, will comply with it and has not knowingly violated it during the prior year. (Appendix 2)

Directors Attestation – Each Director, when first appointed and in the second quarter of each year will receive a copy of the current Code of Ethics and must attest that he or she was given a copy of the Code of Ethics, has read it, understands it, will comply with it and has not knowingly violated it. (Appendix 3)

Monitoring and Reporting –The Human Resources Department and the Legal Department will monitor the updating of the Code of Ethics. The Legal Department will manage the distribution and monitor the attestations of the Code of Ethics for each Director. The Human Resources Department will manage the distribution and monitor the attestations of the Code of Ethics for each Covered Person.

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

All employee inquiries with respect to the Code of Ethics must be initially directed to the employee's manager, who will consult with the Company's Human Resources Department on the matter to the extent necessary. Executive Officers (SVPs and higher) should consult with the Head of Human Resources, the General Counsel, 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 Company's General Counsel.

C. 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 is to be done in order to ensure that such things as new or revised policies, activities, and laws have been properly updated or included in the Code when required. It is each employee's responsibility to be mindful of any changes to the Code of Ethics as they may affect their responsibilities and duties at the Company.