Approved by the Board Compensation Committee on September 22, 2026
Approved by the Board of Directors on October 20, 2026



Code of Ethics

2026

Policy Version History

Policy Name: Code of Ethics

Responsible Approving Committee: Compensation Committee

Policy Version	Board of Directors Approval Date	Board Committee Approval Date	Change Type	Summary of Change
8.2026	10/20/2026	09/22/2026	M	• Added a non-retaliation statement • Clarified reporting channels, the findings review by the Board, and disciplinary consequences • Updated Conflicts of Interest • Revised the waivers section

Change Type: S = Substantive | M = Minor | A = Administrative | NC = No Change

Legend:

***Substantive*:** Materially changes policy requirements, scope, controls, responsibilities, or compliance obligations.

***Minor*:** Clarifies or updates language without materially changing policy requirements or intent.

***Administrative*:** Updates to formatting, names, titles, dates, references, or other non-substantive details.

***No Change*:** Reviewed for approval with no revisions required.

CODE OF ETHICS

POLICY

The directors and officers of First Bank (the "Bank") believe that fair and ethical business practices are fundamental to the Bank's operations. The nature of the Bank's business creates special obligations to preserve public trust. Accordingly, the Bank is committed to conducting business professionally and in full compliance with its ethical and legal obligations.

This Code of Ethics is designed to satisfy and exceed the requirements of Section 406 of the Sarbanes-Oxley Act of 2002 and the Securities and Exchange Commission ("SEC") regulations implementing those requirements. This Code is designed to promote:

1. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;

2. Full, fair, accurate, timely and understandable disclosure in reports and documents that the Bank files with or submits to the FDIC or the NASDAQ and in the Bank's other public communications;

3. Compliance with all applicable laws, rules and regulations;

4. Prompt internal reporting of violations or apparent violations of the Code in accordance with the section entitled "PROCEDURE & REPORTING" below; and

5. Accountability for adherence to this Code.

This Code applies to all members of the Bank's senior management, including members of the Board of Directors, whether or not they are employees; the Bank's Chief Executive Officer, Chief Financial Officer, Chief Lending Officer, Chief Operating Officer, and other financial and senior officers ("Bank Officers"); and all other employees of the Bank ("Employees").

Under this Code of Ethics, the actions of all Bank Officers and Employees shall be governed by the highest standards of integrity and fairness. This policy is not intended to supersede other policies of the Bank regarding the conduct of Bank Officers and Employees but instead is intended to be applied in conjunction with those policies. Strict compliance with all applicable laws and regulations is the policy of the Bank, and all decisions shall honor both the spirit and the letter of those laws and regulations. Business shall be conducted honestly and ethically, using technical expertise, business skills and sound judgment needed to benefit customers and shareholders alike.

PROCEDURE & REPORTING

Any individual associated with the Bank, whether as an officer, Director, employee or otherwise, who becomes aware of a known or suspected irregularity, illegality or violation of this Code of Ethics is obligated to take action. The individual must promptly make an oral or written report

directly to the First Senior Vice President / Director of Human Resources. Questions regarding the interpretation of this Code of Ethics may be directed to the President & Chief Executive Officer.

The Bank prohibits retaliation against any person who, in good faith, reports a known or suspected violation of this Code, raises a question regarding its interpretation, or assists with a related review or investigation. Any suspected retaliation must be reported promptly through the reporting channels identified in this Code.

After reviewing any report of a known or suspected irregularity, illegality or violation of this Code of Ethics, the First Senior Vice President / Director of Human Resources or the President & Chief Executive Officer will report the findings to the Board of Directors for review and appropriate action.Failure to adhere to this Code may result in disciplinary action, up to and including termination of employment or service, as applicable. The Board will also notify the appropriate authorities when warranted.

CONFIDENTIAL & NON-PUBLIC INFORMATION

1. It is very important for all Bank Officers and Employees to appropriately safeguard the Bank's confidential and non-public information and to refuse any improper access or improper or untimely disclosure of confidential or non-public information.

2. Confidential or non-public information is information that, when known, is not generally available to the public and is useful or helpful to the Bank, would be useful or helpful to the Bank’s competitors, or would be considered important to investors deciding whether to trade in the Bank’s securities. Confidential or non-public information may include customer, employee, stockholder, supplier, financial or operational information; plans for stock splits, business acquisitions or mergers; or information concerning important regulatory action pending.

3. We should always be alert to inadvertent disclosures that may arise in either social conversations or in normal business relations with our suppliers and customers.

4. Under SEC Regulation FD, the Bank may be subject to numerous requirements and obligations if non-public information is selectively disclosed. Selective disclosure means disclosure to individuals or groups without a broad-based disclosure to the securities markets generally, either through the issuance of a press release or the filing of SEC Form 8-K. To limit the risk of inadvertent disclosure and a possible violation of SEC Regulation FD, all inquiries and discussions regarding the Bank, its operations, performance and prospects must be referred to the President & Chief Executive Officer. The President & Chief Executive Officer will determine whether the Bank will respond to requests for information or interviews from members of the media, financial analysts, stockholders or others, and which Bank official will respond. Bank Officers and Employees must not respond to such requests on their own without first reporting the request to the President & Chief Executive Officer and receiving direction.

5. CONFLICTS OF INTEREST

1. Bank Officers and Employees shall not pursue or engage in any outside employment, business or other commercial activity, either during or outside of his or her Bank work hours, which conflicts or competes directly or indirectly with his or her duties or responsibilities as a Bank Officer or Employee, or with any business interests or activities of the Bank. Engaging in activities that benefit family members or friends during Bank work hours is also prohibited.

2. Although every potential conflict of interest cannot be identified in advance, each Bank Officer and Employee is expected to consider carefully whether any action, during or outside Bank working hours, creates an actual or apparent conflict of interest. Even the appearance of a conflict of interest must be avoided.

3. Bank Officers and Employees have an affirmative obligation to disclose to the President & Chief Executive Officer any interest, including but not limited to a financial interest, in an outside activity or business that may conflict or compete with the interests of the Bank. This disclosure obligation also applies when an immediate family member of a Bank Officer or Employee has such an interest.

4. At no time during Bank working hours or on Bank property shall any Bank Officer or Employee engage in or pursue any non-Bank employment, business or commercial activity, or solicit Bank customers or Bank Officers or Employees for any profit-making purpose.

5. No vendor or consultant shall be retained to perform services for the Bank where a Bank Officer or Employee is related to, lives with or is in a relationship with the consultant or vendor, without the express permission of the President & Chief Executive Officer. Any such existing relationships must be immediately disclosed to the President & Chief Executive Officer

GIFTS, MEALS AND ENTERTAINMENT

1. Socializing is a normal and accepted component of conducting certain facets of the Bank's business; however, Bank Officers and Employees must not permit this to compromise a business judgment or give even the appearance of impropriety. Therefore, giving, accepting, soliciting or offering, or authorizing, directly or indirectly, gifts, favors or entertainment, or other consideration, of significant value, in transactions with customers, suppliers, vendors and all other organizations or individuals doing or seeking to do business with the Bank, is prohibited. Any consideration is of significant value if it could or does result in any appearance of impropriety, if it could compromise the decision of any Bank Officer or Employee in exercising a business judgment or if its acceptance is detrimental, in any way, to the Bank.

2. In addition, no transaction with any of the groups identified above shall involve:

   – Monetary payments, gift certificates, or credit arrangements

- Receipt of any materials or services at less than actual cost, or
- Actions that result in a conflict of interest or the appearance thereof.

1. This policy generally does not prohibit an occasional lunch or dinner, golf outing, sporting or fundraising event, or vendor conference. However, when meals, events or outings are provided regularly, they may create an appearance of impropriety or suggest an improper purpose. To obtain guidance and enable the Bank to identify patterns, Bank Officers and Employees must report all gifts or other consideration received from any customer, supplier, vendor, current business partner or prospective business partner. Reports must be made to the President & Chief Executive Officer as soon as practicable.

SECURITIES FRAUD AND INSIDER TRADING

2. It is both illegal and against Bank policy for any individual to profit from undisclosed information relating to the Bank or any company with which we do business. Anyone who is in possession of any material nonpublic information ("inside information") that the Bank has not yet disclosed to the public may not purchase or sell any of the Bank's securities, unless such transactions are made pursuant to a bona fide written plan for trading securities meeting the requirements of SEC Regulation 10b5-1(c)(B). Also, it is against Bank policy for any Bank Officer or Employee who may have inside or unpublished knowledge about any of our suppliers, customers, or any company we do business with to purchase or sell the securities of those companies.

3. It is clearly against Bank policy, and possibly illegal as well, to trade the Bank's securities or the securities of any other company, in a way which attempts to hide the true identity of the trader or to mislead others as to exactly who is doing the trading. Any Bank Officer or Employee trading in the Bank's securities or the securities of other companies, using fictitious names, names of relatives or friends, or brokerage accounts under fictitious names located in foreign jurisdictions shall be subject to immediate disciplinary action. Should the Bank discover any such trading, it will disclose it to the appropriate authorities.

SECURITIES AND EXCHANGE COMMISSION REPORTING

1. As a publicly traded company subject to the Securities Exchange Act of 1934, the Bank has an obligation to file various reports and documents with the FDIC and NASDAQ and to make material information about the Bank generally available to the public. The Bank is committed to providing full, fair, accurate, timely and understandable disclosure to the trading markets. Any Bank Officer or Employee who knows or believes that a Bank filing or proposed filing with the FDIC contains inaccurate information or omits information material to an investor’s understanding of the Bank, its operations and prospects, must notify the Chief Financial Officer of the Bank Officer’s or Employee’s concerns.

WAIVERS FROM THE CODE OF CONDUCT

2. Waivers from the requirements of this Code of Ethics may be granted only by the Audit Committee of the Board of Directors and, for executive officers and directors, by the full

Board of Directors. An individual requesting a waiver of any provision of this Code must provide a detailed written statement to the Audit Committee or the full Board of Directors, as applicable, explaining the facts and circumstances that the individual believes make a waiver appropriate. Waivers are expected to be granted rarely, if ever, and only prospectively, not retroactively.

3. In the unlikely event that a waiver from the requirements of this Code of Ethics is granted, or in the event this Code of Ethics is otherwise changed or amended, the Bank shall promptly provide public notice of such waiver, change or amendment in accordance with the requirements of SEC Release 33-8177.

AMENDMENTS

Policy Owner: Human Resources. Approval Authority: Compensation Committee and Board of Directors, as applicable. Review Frequency: At least annually.

This Code of Ethics will be reviewed at least annually and revised, if necessary, to reflect changes in applicable law or regulation and to cover new ethical issues as they arise.

Effective Date: This Code becomes effective upon approval by the applicable governing body and supersedes all prior versions.

APPENDIX A

FIRST BANK

CODE OF ETHICS

COMMITMENT OF COMPLIANCE

I acknowledge that I have received and read the First Bank Code of Ethics adopted by the Board of Directors. I understand my duties and obligations under the Code of Ethics and agree to comply with its provisions at all times. To the best of my knowledge, I am not aware of any personal or family circumstance or activity that conflicts with the interests of the Bank.

I understand that failure to comply with this Code of Ethics may result in penalties, including dismissal from employment or removal from service on the Board of Directors, as applicable. I further understand that my agreement to comply with the Code of Ethics does not create or establish any right to employment by the Bank or service on the Board of Directors.

_____ _____

Signature Date

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Print name and title