



Code of Business Conduct and Ethics

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Our Code of Business Conduct and Ethics

We are committed to the highest standards of ethical and professional conduct. This Code of Business Conduct and Ethics outlines our basic tenets of business practice and professional expectations for our directors, officers, and employees. These tenets are consistent with our values as a bank. Failure to adhere to this Code may result in disciplinary action, up to and including termination. If you are in a situation that you believe may violate or lead to a violation of this Code, follow the guidelines described in the section of this Code titled “Compliance Procedures.”

This Code applies to:

- all members of United’s Board of Directors;
- all officers of United and its subsidiaries; and
- all employees of United and its subsidiaries.

Notice to Directors, Officers, and Employees

Nothing in this handbook prohibits or limits any director, officer, or employee or his/her counsel from initiating communications directly with, responding to any inquiry from, volunteering information to, or providing testimony before, the Securities and Exchange Commission (“SEC”), the Department of Labor (“DOL”), the Equal Employment Opportunity Commission (“EEOC”), the Department of Justice (“DOJ”), the Financial Industry Regulatory Authority, Inc. (“FINRA”), or any other state, federal, law enforcement, self-regulatory organization, or regulatory authority in connection with any reporting of, investigation into, or proceeding regarding suspected violations of law, and no director, officer, or employee is required to advise or seek permission from United before engaging in any such activity. In connection with any such activity permitted above, directors, officers, and employees should identify any information that is confidential and ask the government agency for confidential treatment of such information.

Notwithstanding the foregoing, directors, officers, and employees are not permitted to reveal to any third party, including any governmental, law enforcement, or regulatory authority, information such person came to learn during the course of such person’s service to or employment with United that is protected from disclosure by any applicable privilege, including but not limited to the attorney-client privilege, attorney work product doctrine, and/or other applicable legal privileges. United does not waive any applicable privileges or the right to continue to protect its privileged attorney-client information, attorney work product, and other privileged information.

Additionally, directors, officers, and employees recognize that their abilities to disclose information may be limited or prohibited by applicable law, and United does not consent to disclosures that would violate applicable law. Such applicable laws include, without limitation, laws and regulations restricting disclosure of confidential supervisory information or disclosures subject to the Bank Secrecy Act (31 U.S.C. §§ 5311-5330), including information that would reveal the existence or contemplated filing of a suspicious activity report.

Confidential supervisory information includes any information or materials relating to the examination and supervision of United by applicable bank regulatory agencies, United materials responding to or referencing nonpublic information relating to examinations or supervision by United regulatory agencies, and correspondence to or from applicable United regulators.

If a law conflicts with a policy in this Code, you must comply with the law. If you have any questions about a potential conflict, you should discuss them with your supervisor.

Discrimination, Harassment, and Retaliation Prevention

We are committed to providing a work environment that is free of harassment, discrimination, or retaliation. As a result, we maintain a strict policy prohibiting discrimination, harassment, or retaliation of or against our job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, officer, director, vendor, customer, or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, related medical conditions, and lactation), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, disability, protected medical condition as defined by applicable state or local law, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as “protected characteristics”). We also prohibit retaliation as defined below.

These behaviors are unacceptable in the workplace and any work-related settings such as remote work settings, business trips, and United-sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, director, officer, co-worker, client, customer, vendor, or other third party. In addition to being a violation of this policy, discrimination, harassment, or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws and ordinances also is unlawful. If such harassment occurs in the workplace by someone not employed by United, the procedures in this policy should be followed.

Discrimination defined: Discrimination under this policy generally means treating differently or denying or granting a benefit to an individual because of the individual’s actual or perceived protected characteristic.

Harassment defined: Harassment generally is defined in this policy as unwelcome verbal, visual, or physical conduct that denigrates or shows hostility or aversion toward an individual based on or because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures, or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts, or emails), or physical conduct (including physically threatening another, blocking someone’s way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state, or local laws and ordinances. Because it is difficult to define unlawful harassment, directors, officers, and employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual harassment defined: Sexual harassment includes harassment on the basis of sex or gender (including pregnancy, childbirth, related medical conditions, and lactation), gender identity or gender expression (including transgender status), and/or sexual orientation. Sexual harassment includes unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature or which is directed at an individual because of that individual’s sex or gender (including pregnancy, childbirth, related medical conditions, and lactation), gender identity or gender expression (including transgender status), and/or sexual orientation when:

- Submission to that conduct, advances, or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of the conduct, advances, or requests by an individual is used as the basis for employment decisions affecting the individual; or

- The conduct, advances, or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of conduct that violates this policy include:

- Unwelcome flirtations, leering, whistling, touching, pinching, assault, brushing up against someone's body, blocking normal movement.
- Requests for sexual favors or demands for sexual favors in exchange for favorable treatment.
- Obscene or vulgar gestures, posters, or comments.
- Sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies.
- Propositions or suggestive or insulting comments of a sexual nature.
- Derogatory cartoons, posters, and drawings.
- Sexually explicit emails or voicemails.
- Uninvited touching of a sexual nature.
- Unwelcome sexually related comments.
- Comments, inquiries, or gossip about one's own or someone else's sex life or sexual activities.
- Conduct or comments consistently targeted at only one gender, even if the content is not sexual.
- Teasing, or other conduct directed toward a person because of the person's gender.

Retaliation defined: Retaliatory conduct is any conduct that would reasonably dissuade an employee from raising, reporting, or communicating about good faith concerns through our internal reporting channels or with any governmental authority, or from participating in or cooperating with an investigation or legal proceeding raising such concerns. Retaliation may occur through conduct or written communication and may take many forms, including, but not limited to, discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act performed in connection with such reporting.

Reporting Procedures

Any applicant or employee who believes they have been subjected to harassment, discrimination, or retaliation by a co-worker, supervisor, manager, client, visitor, vendor, customer, or temporary or seasonal worker of United, or who believes another individual has been subject to such conduct, should report it immediately. Applicants and employees are encouraged to report incidents, even if they relate to incidents in the past, involve individuals who are no longer affiliated with United, or concern conduct occurring outside of work if it impacts the individual at work.

Complaints can be made verbally or in writing to a supervisor, manager, or any Human Resources representative. Employees who wish to make anonymous complaints can use United's confidential reporting line, EthicsPoint, as discussed below. Employees are not required to report any prohibited conduct to a supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters. If the employee makes a complaint under this policy and has not received an initial response within five (5) business days, the employee should contact the Chief Human Resources Officer immediately by phone at 864.695.0530 or by email at holly_berry@ucbi.com.

ethicspoint.com
 Telephone: 1-866-ETHICSP (1-866-384-4277)
 UConnect - homepage

EthicsPoint will ensure that all complaints are reported confidentially to the appropriate individuals within United, including, if warranted, the Board of Directors, without disclosure of the employee's identity.

Every supervisor or manager who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy must immediately report the issues raised or conduct to Human Resources or senior management.

Investigation Procedures

After a report is received, we will undertake a thorough and objective investigation. Confidentiality will be maintained to the extent practical and permitted by law. However, complete confidentiality may not be possible in all circumstances. United expects all directors, officers, and employees to fully cooperate with any investigation into a complaint of proscribed harassment, discrimination, or retaliation, or regarding the alleged violation of any other United policies, and to keep matters related to the investigation confidential.

Upon completion of the investigation, we will determine whether a policy violation has occurred based on the reasonable evaluation of the information gathered during the investigation. In the event we determine that a violation of this policy has occurred, we will take steps to ensure a safe work environment for the individuals who experienced the complained-of conduct. We will take corrective measures against any person who the investigation finds to have engaged in conduct in violation of this policy if we determine such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom we determine has engaged in conduct that violates this policy will be subject to discipline, up to and including termination. This includes individuals engaging in discrimination, harassment, or retaliation, as well as supervisors or managers who fail to report violations of this policy or knowingly allow prohibited conduct to continue.

Individuals who engage in conduct that rises to the level of a violation of the law can be held personally liable for such conduct. If a complaint cannot be substantiated, we may take appropriate action to reinforce our commitment to providing a work environment free from harassment, discrimination, and retaliation.

Risk Management

Our Risk Framework, which has been approved by our Board of Directors, provides an understanding of our approach to risk management and each employee's responsibilities for managing risk, promoting a culture that:

- Instills the importance of managing risk through an effective control environment.
- Ensures appropriate focus on risk in all activities and that risk is everyone's responsibility.
- Encourages the necessary mindset and behavior to enable effective risk management.
- Promotes sound risk-taking within our risk appetite.
- Ensures adherence to applicable laws/regulations and internal policies.

Individual accountability means understanding the risk and reward in all we do to ensure we act in the best interest of our customers, communities, and shareholders.

When we all take personal ownership of risk management, it contributes to the strength and sustainability of our bank and supports the work we do to serve our customers, communities, shareholders, and employees.

Conflicts of Interest

A conflict of interest may occur when your personal interests, or the activities you perform on behalf of United, interfere or appear to interfere with the bank's, shareholder's, or a customer's best interest. A conflict can arise when you take action or have interests that make it difficult to perform your work objectively and effectively. Conflicts of interest may also arise when you, or a member of your family, receive improper personal benefits as a result of your position with United. We must take reasonable steps to identify, mitigate, disclose, or restrict business activities or practices that may pose a conflict.

Conflicts of interest are prohibited as a matter of United policy. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management or United's Human Resources representative. If you become aware of a conflict or potential conflict, you should bring it to the attention of a supervisor, manager, or other appropriate person or consult the procedures described in the section of this Code titled "Compliance Procedures."

Some of the potential conflicts of interest that you must be aware of are:

Bribery and Corruption

You may not accept, promise, or give money or anything of value to any customer, government employee, or any other person for the purpose of improperly influencing a decision, securing an advantage, or obtaining or retaining business.

Loans or Guarantees of Obligations

Loans to, or guarantees of obligations of, directors, officers, and employees, and their family members, may create conflicts of interest. Please refer to the section of this Code titled "Financial Affairs – Personal Borrowing and Lending."

Gifts and Entertainment

A conflict of interest may arise when you give or receive gifts or entertainment to or from customers, prospects, or third parties. You must ensure that the exchange of gifts or entertainment is reasonable and for a legitimate business purpose (unless personal in nature).

You are prohibited from providing or receiving gifts or entertainment that are frequent or excessive that could be perceived as improper. Your gift and entertainment activities may be restricted to specific dollar limits and/or subject to certain preapproval thresholds.

Political Contributions and Activities

In general, you may make personal political contributions, within applicable legal limits, to candidates, parties, and committees. Because of industry regulations and federal, state, or local laws, directors, officers, and employees of particular businesses or who have certain coverage responsibilities may be restricted from making some political contributions or engaging in certain political activities.

Under no circumstance may you coerce or pressure other directors, officers, or employees to make political contributions or influence such individuals to cast ballots for candidates for elected positions. Directors, officers, and employees may not make use of any United assets or personnel to engage in political fundraising or solicitation activities on United premises.

Interactions with Government Employees

You must not offer, give, or promise to give money or anything of value to any employee of any government, agency, state-owned or controlled enterprise, political party, or candidate for political office if it could be perceived as a conflict of interest or suggestion of a quid pro quo.

Personal Relationships among Directors, Officers, and Employees

While you may have a personal relationship with someone who also works at United, it is important that hiring decisions, reporting relationships, and other terms and conditions of employment (e.g., granting time off, adjusting schedules, or other potentially favorable work arrangements) avoid any conflict of interest or the appearance of a conflict of interest.

A real or perceived conflict of interest may arise if you have a personal relationship with another director, officer, or employee where either party has direct or indirect influence over the other party's employment, compensation, approval authority, chain of custody, or work conditions. Examples of personal relationships include, but are not limited to, those of a family member, close friend, intimate or romantic partner, roommate, babysitter, and/or renter/landlord. Further, you must avoid workplace relationships that would create a conflict of interest. For example, managers are prohibited from dating or engaging in romantic relationships with subordinates or anyone in their chain of command. Escalate to your manager or Human Resources if you have a personal relationship that could create such a conflict or if you are unsure whether a particular personal relationship creates a conflict.

Gifts among Directors, Officers, and Employees

A conflict of interest may arise when you provide or receive gifts to or from another director, officer, or employee, especially when gifts are exchanged among individuals in the same reporting line or in positions of influence. Directors, officers, and employees must exercise good judgment to ensure that any gift is reasonable for the occasion and is not lavish or so frequent to create any appearance of a conflict of interest or be perceived as compensation or reward for job performance.

Note that you may provide gifts in connection with life events (e.g., weddings, birthdays, births) where the circumstances make it clear that it is the life events—rather than United's employment relationships—that are the motivating factors for giving the gifts.

Outside Business Activities

A conflict of interest or other risk may arise from activities, employment, or other relationships conducted outside your role with United. For purposes of this policy, self-employment is considered outside employment. You must inform your manager prior to engaging in an outside business activity. You must not allow any outside business activity to interfere with your job performance. You must not act on behalf of or appear to represent United in any business transaction outside your role and responsibilities with United.

It is almost always a conflict of interest for a United director, officer, or employee to work simultaneously for a competitor, customer, or vendor. You are not allowed to work for a competitor, including as a consultant or board member. The best policy is to avoid any direct or indirect business connection with our competitors, customers, or vendors, except on our behalf.

Corporate Opportunities

Directors, officers, and employees are prohibited from taking opportunities that are discovered through the use of United property, information, or position for themselves. You may not use corporate property, information, or position for improper personal gain, and you may not compete with United directly or indirectly. Directors, officers, and employees owe a duty to United to advance its legitimate interests when the opportunity to do so arises.

Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with United's customers, vendors, competitors, and employees. No United director, officer, or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Responding to Media Inquiries

We strive to promote and protect the United brand and reputation through engagement with the news media as part of our larger marketing, communications, public policy, and corporate affairs activities. If you are contacted or approached by a reporter or member of the media and asked to speak on behalf of United, you should direct them to the Corporate Communications team. Only directors, officers, and employees designated by the Chief Marketing Officer are authorized to speak with the media, including social media, as spokespersons for and on behalf of United.

Social Media and Electronic Communications

It is the policy of United to comply with all applicable laws, rules, and regulations with respect to all statutory provisions of the rules, regulations, standards, etc., as it relates to social media and electronic communication as outlined in the policy. Management and the Board will establish and maintain a corporate culture and business practices that ensure there are sufficient compliance controls in place including (but not limited to) policies and procedures, training, and monitoring and auditing functions to effectively identify program weaknesses that exist, ensure corrective measures are implemented, and provide bank management and the Board (or a committee thereof) with periodic reports of the program's status.

We maintain this policy to help manage our potential compliance, legal, regulatory, and reputational risks associated with offering financial products and services to our customers. This policy applies to all directors, officers, and employees involved in social media. United uses social media as a marketing and communications tool that allows the bank to communicate with current customers, potential retail and commercial customers, and members of local communities. An active presence is maintained on Facebook, LinkedIn, Twitter, Instagram, and YouTube where United shares information related to its products and services, community involvement, and corporate news and announcements.

Social media is a form of interactive online communication in which users can generate and share content through text, images, audio, and/or video. Social media can take many forms, including, but not limited to, micro-blogging sites (e.g., Facebook and Twitter), photo and video sites (e.g., Instagram and YouTube), sites that enable professional networking (e.g., LinkedIn), and social games (e.g., Words with Friends or Candy Crush). Social media can be distinguished from other online media in that the

communication tends to be more interactive. Messages sent via email or text message alone do not constitute social media, although such communications may be subject to several laws and regulations discussed in this policy. Social media is a dynamic and constantly evolving technology, so any definition of this technology is meant to be illustrative and not exhaustive.

This policy applies to any United directors, officers, or employees who engage in their own personal or professional use of social media for any reason, including if such individual references United in social media or otherwise uses social media in relation to United (i.e., product promotions, production roles, employment commentary, etc.). Directors, officers, or employees who reference United are required to remove United Community, or any division thereof, as their current employer on all social media channels once employment or affiliation with United has ended.

Social Media Account Oversight and Execution

As part of our desire to leverage social platforms to facilitate communication with customers, prospects, and community members, United has established a Brand Ambassador Program, composed of a Social Ambassador Program and a Social Selling Program. Members of these programs, hereafter referred to as “Brand Ambassadors,” receive initial onboarding training as well as biannual refresher training. Any director, officer, or employee who is not an approved participant in one of these programs is not permitted to use social media platforms as sales or advocacy tools on behalf of United.

Response to Negative Social Comments

Additionally, neither United directors, officers, employees, nor Brand Ambassadors should use their personal or professional accounts to post as if on United’s behalf (i.e. “United apologizes for the inconvenience”) on corporate social media accounts or on their own accounts. This includes but is not limited to responding to customer complaints, messages, or reviews, etc.

Marketing and Communications (MarCom) will handle direct communication with any individual on social media who interacts with the corporate accounts, with the guidance of relevant departments if necessary.

If a Brand Ambassador receives a negative comment on their own social media account, they will report it as soon as possible (expectation is within 24 hours) to the Social Media Manager, who will record the incident and help the Brand Ambassador reply appropriately. If the Social Media Manager believes that the comment raises more significant concern, they will report the comment (and any other public conversation and response through that time) to the Marketing Department and any other relevant departments who will then determine if any additional response is necessary.

When responding to customers or prospects via the customer’s personal social media site (e.g., engaging in one-on-one conversation via a prospect’s LinkedIn site), directors, officers, and employees must take care to abide by all applicable consumer protection laws, compliance laws, and platform standards and regulations.

Corporate Social Media Postings

All corporate postings must conform to all applicable consumer protection and compliance laws and regulations. Employees and third-party vendors engaged by United to initiate social media posts on behalf of United on any corporate business account will undergo periodic training. The scope of United’s permissible uses of social media and the impermissible activities by employees and third-party vendors will be described in the training materials.

MarCom, either directly or through its vendor partners, and the Compliance Department will monitor all United-initiated, customer-related posts. The Human Resources Department will approve United-initiated, employee-related posts (e.g., recruiting). The Compliance Department will approve all promotional or service-related posts prior to posting. We will not target individual consumers or prospects with offers via social media or take product applications via social media. However, United may broadly advertise, with all required disclosures and accuracy and within the social media policy, the availability of various lending, depository, or other products or services.

Social Media Comments by Directors, Officers, and Employees

The Social Media Manager will track (through a social media management tool) and report to the Marketing Department all comments or postings received on United director, officer, or employee social media accounts that escalate negatively or positively or are noteworthy. In the event of a negative escalation, the incident must be recorded by the Social Media Manager. The Social Media Manager may enlist the support or guidance of others at United to provide the appropriate response for an optimal user experience.

Duty to Cooperate

You must fully and truthfully cooperate with any internal or external investigation or audit, regulatory examination, or request for information. You need to be aware of and comply with any applicable business-specific policies and procedures regarding contact with regulators, which, among other things, may require you to report such contact to either your manager and/or Compliance Officer. Additionally, you must immediately inform your manager if you are the subject of an external investigation unless laws, regulations, or the investigating authority prohibit you from doing so. Failure to do so may result in disciplinary action, up to and including termination.

Background Checks and Duty to Report Arrests

All United applicants are required to pass a criminal background check as a condition of employment. Background checks are conducted only after an applicant receives a conditional offer of employment. As a federally regulated financial institution, we are prohibited from employing individuals whose criminal history does not meet applicable legal and financial industry rules. We also conduct an individualized review of an applicant's criminal history with a focus on maintaining the safety and soundness of the bank. To ensure continuing compliance with these laws and standards, we may conduct additional criminal background checks at any time during employment. In addition to complying with any line-of-business specific guidelines or industry requirements, unless prohibited by law, you are required to inform the bank of any arrest or criminal investigation that arises during your employment for any offense other than a minor traffic violation. Arrests and charges will be considered only as required or permitted by applicable law, and disclosure of a pending arrest or charge or resulting conviction will not necessarily disqualify you from employment. If you have any questions regarding compliance with this requirement, you should contact Human Resources.

Customer Information

You must not access or use customer information except for appropriate business purposes, and you must protect the confidentiality and security of the customer information. Please refer to United's Privacy Policy and information security policies for additional details regarding your responsibilities for safeguarding customer information found on UConnect.

SAFE Act

The Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act) requires that individuals who meet the definition of a Mortgage Loan Originator (MLO) must be registered and possess a unique Nationwide Mortgage Licensing System (NMLS) number. An MLO is an individual who accepts applications for consumer residential mortgage loans, including Home Equity Lines of Credit (HELOCs), and offers or negotiates the terms of such loans. When acting in the capacity of an MLO, you must disclose your NMLS number in the following instances:

- When you are soliciting mortgage applications,
- When you are discussing applications with prospects,
- When you are advertising your services,
- When you are using social media platforms to promote yourself as someone who can assist with mortgage products, and,
- On your business cards and within the signature lines of your email communications.

Personnel Files

You may inspect your own personnel file in the presence of a representative of the bank. Please contact Payroll at HR-Payroll@ucbi.com to schedule a time. You may not be allowed to view investigation records or any letters of reference that have been prepared or collected by management. You will be provided access to personnel records in accordance with applicable state law.

Only authorized members of management and Human Resources have access to personnel files. We will cooperate with and provide access to a personnel file to law enforcement officials or local, state, or federal agencies, or in response to a subpoena, in accordance with applicable law.

Supervisory Information Received from Regulatory Authorities

Supervisory information received from our regulatory authorities must be treated as confidential. Depending on the agency, such material may be deemed government property that we are not authorized to share or disseminate without express written consent. Information received from regulatory authorities should be kept secure and not disseminated without proper authorization. Contact the Compliance Department for questions about these restrictions.

United Information

You must keep secure and not disclose confidential or proprietary information about United, such as business and strategic plans, market conditions that may be of use by competitors or harmful to United or its customers if disclosed, and third-party information. Such information should only be shared within United with other directors, officers, or employees who “need to know” the information to perform their duties. Consult your manager if you have questions about sharing information about United on a “need to know” basis.

Director, Officer, and Employee Information

You must not access another director’s, officer’s, or employee’s information or use another director’s, officer’s, or employee’s information except for appropriate business purposes, and you must protect the confidentiality and security of such information.

Third-Party Information

Various third parties share with United their non-public or proprietary information (“Confidential Information”), such as actual and prospective vendors, financial counterparties, and parties to strategic transactions. You must keep confidential and secure any such Confidential Information and only use the Confidential Information for the purpose that it was provided about United’s purchase of products or services or other information received by United from a third party. Sharing such information could result in competitive harm to a third party, provide an improper advantage to a third party’s competitor, and violate agreements that United has with a third party. In some instances, it also might violate the “need to know” principle for Material Non-Public Information (MNPI).

Compliance with Laws, Rules, and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which United’s ethical standards are built. All directors, officers, and employees must respect and obey the laws of the cities, states, and countries in which we operate. Although you are not expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers, or other appropriate personnel.

Further information regarding United’s Insider Trading Policy is set forth below.

Insider Trading Policy

This Insider Trading Policy provides guidelines with respect to transactions in the securities of United Community Banks, Inc. and the handling of confidential information about United and the companies with which we do business. United’s Board of Directors has adopted this policy to promote compliance with securities laws that prohibit certain persons who are aware of material nonpublic information about United from: (i) trading in securities of United or (ii) providing material nonpublic information to other persons who may trade on the basis of that information.

Persons subject to this policy have ethical and legal obligations to maintain the confidentiality of information about the bank and to not engage in transactions in United securities while in possession of material nonpublic information.

Persons Subject to the Policy

- all employees of United and its subsidiaries;
- all officers of United and its subsidiaries; and
- all members of United’s Board of Directors.

Transactions Subject to the Policy

This policy applies to transactions in the bank’s securities, including the bank’s common stock, options to purchase common stock, restricted stock awards, and derivative securities that are not issued by United, such as exchange-traded put or call options or swaps relating to United’s Securities.

United Assistance

The full policy is available on UConnect. Any person who has a question about this policy or its application to any proposed transaction may obtain additional guidance from Jefferson Harralson (864-240-6208) and Melinda Davis Lux (864-241-8736).

United Assets

We must properly care for and protect United property and assets from theft, loss, carelessness, waste, and cybersecurity threats. Our property and assets should be used efficiently and for legitimate business purposes only.

You must not:

- Steal, embezzle, or misappropriate money, funds, or anything of value from United. Doing so subjects you to potential legal or disciplinary action, according to the law and United policy.
- Use United assets for personal gain or advantage. This includes personal use of confidential or proprietary information that you learn through your employment.
- Remove United assets from the facilities unless you are authorized to do so or have your manager's approval.
- Use official United stationery, the corporate brand, documents, or the United name for commercial gain.
- Misuse your internet, phone, or email privileges.

You are expected to safeguard United-issued hardware, software, and devices against theft, loss, or unauthorized use. You must protect your login credentials and use caution when opening email attachments or clicking on links as these can introduce significant malware risk to United. You should promptly report any incidents, whether suspect or actual.

Intellectual Property

Any and all assets you create for United or while using United resources are the bank's property and remain its property even if you leave United. We respect the intellectual property rights of others. In addition, you must not obtain, use, sell, or distribute the intellectual property of others in violation of confidentiality obligations or intellectual property law.

Financial Affairs

You should conduct your personal financial affairs responsibly and keep your business expenses in order. You are responsible for your financial activities in the following areas:

Personal Borrowing and Lending

To avoid potential conflicts of interest, you may not personally borrow money from or lend money to customers or vendors, unless the loan is a transaction with an institution normally in the business of lending and is obtained in non-preferential terms.

In addition, borrowing money from or lending money to other directors, officers, or employees (unless they are family members) is not permitted. The occasional loan of nominal value (such as for lunch, dinner, or a social event that is promptly reimbursed) is acceptable, as long as no interest is charged.

Business Expenses

You must report your business expenses accurately and in a timely manner. You also must not use business credit cards for any purpose other than appropriate business expenses.

You may not make business purchases directly from or (unless specifically authorized) enter into contracts on behalf of United with third parties. We have established requirements for efficient and compliant purchasing, contracting, and payments for products and services acquired from third parties.

Personal Accounts and Fees

Misuse of United personal accounts and United services (e.g., personal debit or credit cards issued through United) is prohibited. Additionally, you may not process transactions (e.g., refunding fees) unless you are permitted under existing policies to do so. Further, accepting personal fees or commissions for any transaction on behalf of United unless you are specifically authorized to do so is prohibited.

Overdraft

You are expected to properly maintain your personal finances at all times. Therefore, any circumstances that may lead to an over-extension of credit, drawing checks against insufficient funds (commonly called overdrafts), or other situations that may reflect negatively on yourself or United must be avoided at all times.

Overdraft protection is available at your request and is subject to normal credit approval. You may link a savings account to your checking account for additional protection. Due to strict withdrawal regulations on saving accounts, this form of overdraft protection should only be used in emergency situations.

If you display signs of failing to properly maintain your creditworthiness, it may lead to disciplinary action up to and including termination.

For any designated Regulation O Executive Officer or Director that has an account, we may not pay on behalf of that person an amount exceeding the funds in the account and may not waive any fees.

Anti-Money Laundering and Economic Sanctions

Money laundering is the process by which criminals attempt to make “dirty” money (derived from unlawful activities) look “clean” (as if from legitimate sources) by moving it through a financial institution.

Economic sanctions are foreign policy tools that impose strict limits on a range of activities, including providing financial services or conducting transactions. They are imposed by governments or international bodies to try to isolate or impede a specified individual, entity, or jurisdiction for some specified purpose or activity.

These rules target people such as criminals who engage in activities that harm us and our communities (e.g., human trafficking, corruption, drug trafficking, fraud, wildlife trafficking, and financing terrorism), as well as those who threaten national security.

We all have a role to play in helping to prevent criminals and targets of sanctions from using United’s products and services. This includes an obligation to know our customers, identify and escalate suspicious activity, and escalate transactions with sanctioned countries, people, or businesses. We must comply with anti-money laundering rules and economic sanctions, as we have an important role in allowing investigators to follow the money and prevent criminals and sanctions targets from being able to access their funds.

Facilitation of Tax Evasion

We may be exposed to reputational harm or potential civil and criminal liability if those providing services (e.g., directors, officers, employees, agents, service providers, and vendors) facilitate the evasion of taxes while working on behalf of United.

Tax evasion is dishonest non-compliance with tax rules (e.g., intentionally or recklessly not reporting income or capital gains or not paying taxes owed). This should be distinguished from “tax planning,” which involves neither dishonest conduct nor non-compliance.

Facilitation of tax evasion may occur when you become aware that a customer (a corporate entity or an individual) dishonestly intends to evade paying the correct amount of tax and, either through your own conduct (such as the advice you give) or by intentionally turning a blind eye to dishonest conduct, you knowingly assist the evasion of taxes. This situation could arise in several ways, but a few examples could be: as part of your role in structuring a transaction or setting up accounts you assist someone to evade payment of tax, or you are asked to remit money in an unusual way for the purpose of evading required tax obligations.

You are expected to be informed of and alert to this issue to ensure that you do not knowingly assist in the evasion of taxes. Questions or concerns regarding the possible facilitation of tax evasion or any knowledge or suspicion of tax evasion must be reported to EthicsPoint.

Business Continuity

Our business continuity program prepares our teams to respond in the event of a loss of facilities or technology, placing the highest priority on the safety and security of our customers and employees. The goal of the program is to provide continuous services to the community and to protect the integrity of customers' accounts during an event. All employees are required to complete Business Continuity Awareness training on an annual basis.

Confidential Reporting

We encourage all directors, officers, and employees to report any concerns about questionable accounting, compliance, legal, ethical, or other practices related to United. Employees are encouraged to report concerns through an independent service provider, EthicsPoint. This may be accomplished through the following website or toll-free telephone number:

ethicspoint.com
Telephone: 1-866-ETHICSP (1-866-384-4277)
UConnect - homepage

EthicsPoint will ensure that all complaints are reported confidentially to the appropriate individuals within United, including, if warranted, the Board of Directors, without disclosure of the individual's identity.

Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code or any violations of laws, rules, or regulations. However, in some situations, it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- Seek help from United resources. You may discuss violations or ethics issues with your supervisor, the Chief Human Resources Officer by phone at 864-695-0530 or by email at holly_berry@ucbi.com, the United Legal Department, or EthicsPoint (an independent service provider—see the section of this Code titled “Confidential Reporting”) through the following website or toll-free telephone number:

ethicspoint.com
 Telephone: 1-866-ETHICSP (1-866-384-4277)
 UConnect – homepage

- You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. United does not permit retaliation of any kind against you for good faith reports of violations of this Code or laws, rules, or regulations.
- Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

Enforcement of This Code

United will take prompt and consistent action against violations of this Code. Failure to adhere to this Code may result in disciplinary action, up to and including termination, and such action will be designed to fit the nature and facts of the violation. Notwithstanding the foregoing, every employee is terminable at will, and nothing in this Code shall be interpreted or construed so as to affect or change such terminable at will status.

Waivers of This Code

United discourages waivers of this Code except in extraordinary circumstances. Any waiver of this Code for executive officers or directors may be made only by the United Board of Directors or a United Board committee and will be promptly disclosed as required by law or stock exchange regulation.

Additional Requirements for Principal Executive, Financial, and Accounting Officers

In addition to the other requirements under this Code, the principal executive officer (Chief Executive Officer), principal financial officer (Chief Financial Officer), principal accounting officer (Controller), each person performing similar functions to the principal executive officer, principal financial officer, and/or principal accounting officer, each Executive Vice President, each Senior Vice President, and each director of United must:

- Act honestly and ethically, avoiding actual or apparent conflicts of interest between personal and professional relationships.
- Promote full, fair, accurate, timely, and understandable disclosure in reports and documents that United files with, or submits to, the Securities and Exchange Commission and in other public communications made by United.
- Comply with applicable laws, rules, and regulations of federal, state, and local governments and other appropriate private and public regulatory agencies.
- Act in good faith and responsibly, with due care, competence, and diligence, without misrepresenting or withholding material facts.
- Share knowledge and maintain skills necessary and relevant to United's needs.
- Proactively promote ethical and honest behavior within the workplace.
- Assure responsible use of and control of all assets, resources, and information of United.
- Promptly report to a member of the Audit Committee of United's Board of Directors:
 - Any actual or potential violations of this section of this Code.
 - Any actual or apparent conflicts of interest between personal and professional relationships.
 - Any actual or potential violations of any securities or other laws, rules, or regulations applicable to United.