



CODE OF CONDUCT AND ETHICS FOR EMPLOYEES, OFFICERS AND DIRECTORS

1. POLICY STATEMENT

This Code of Conduct and Ethics for Employees, Officers and Directors (this "Code") for Northfield Bancorp, Inc. and Northfield Bank (together with their affiliates, the "Company") applies to all Company employees, officers and directors. The purposes of this Code are to:

- communicate the Company's commitment to ethical conduct;
- describe the Company's practices and expectations for integrity and ethics;
- provide a critical resource to support daily decision-making;
- ensure you say something, where appropriate, and without fear of retaliation; and
- direct your communication when you have questions or need to report something.

This Code is one resource to guide your behavior while employed at the Company; it is not a comprehensive rulebook. Each of us is responsible to uphold and ensure compliance with the letter and spirit of this Code. This Code is supported and supplemented by your immediate supervisor, the Company's management, including executive management, the Board of Directors, and the Company's ethics and whistleblower resources. Be sure to utilize those channels to ask questions, voice concerns, or report suspected misconduct or wrongdoing. It is only through open dialogue and a "know something – say something" culture that we will stay true to our values in our relationships with our key stakeholders, including customers, stockholders, employees, officers and directors.

A. Commitment to Ethical Business Practices

The Company is committed to ethical practices in the conduct of our business. Our commitment to honesty, integrity, trust, respect and excellence reinforces the confidence placed in us by our customers, stockholders, employees, officers and directors the communities we serve, and all other stakeholders. These practices are also essential to our ability to attract and retain talent, customers, and to grow our business. Accordingly, employees, officers and directors should always bear in mind their actions and how they may reflect on the Company whether or not they are acting at the direction of the Company.

Although this Code does not cover every ethical issue that may arise, it sets out basic principles to guide our employees, officers and directors. Each of our employees, officers, and directors must read, understand and adhere to this Code, and conduct themselves accordingly, avoiding any impropriety, or the appearance of such.

In the event any applicable law, regulation, or regulatory rule conflicts with this Code, such law, regulation, or regulatory rule shall take precedence. However, if a local custom conflicts with this Code, this Code takes precedence. We will have more detailed policies covering certain topics in this Code, as deemed necessary. You are required to comply with this Code and any other policies, handbooks, operating rules and procedures set forth in the applicable policies or department or branch manuals. If you have any questions about compliance with policy, or possible conflicts between policies, you should

seek guidance from your manager or Human Resources. Violations of the standards set forth in this Code may be subject to disciplinary action. **IF YOU ARE IN A SITUATION WHICH YOU BELIEVE MAY LEAD TO A VIOLATION OF THIS CODE, PLEASE FOLLOW THE GUIDELINES DESCRIBED IN THE SECTION ENTITLED “PROMPT CONFIDENTIAL REPORTING OF CODE VIOLATIONS.” (SEE SECTION 3(E)(i))**

B. Compliance with Laws, Rules, and Regulations

Employees, officers, and directors should become familiar with all laws, rules and regulations applicable to the Company, as such laws, rules, and regulations relate to daily work requirements and professional responsibilities. Each of these and other laws, rules and regulations are addressed in our various policies and procedures which are available to employees, officers, and directors. Therefore, all of our employees, officers, and directors are required to carry out their responsibilities in accordance with applicable governmental and other laws, rules regulations, and policy, including all applicable federal and state criminal laws governing fraud, bribery, embezzlement, conversion, and conflicts of interest. They also must conduct their business affairs consistent with applicable safety and soundness standards and Code requirements. Everyone is expected to have sufficient knowledge of applicable laws rules and regulations that relate to their duties, and should know when to seek guidance from immediate supervisors or higher authority as outlined in this Code. It is imperative to follow operating rules and procedures covered in applicable department or branch manuals, and to use the proper Company or, without limitation, Northfield Bank, forms, which have been prepared with legal requirements in mind.

2. ROLES & RESPONSIBILITIES

No less than annually this Code is submitted for approval by the Nominating and Corporate Governance Committees of the Company and for adoption by the Boards of Directors of the Company (sometimes referred to as the “Boards of Directors” or the “Boards”). The policy owner is the Corporate Secretary, who also serves as the Ethics Officer for the Company. Each of the Chief Executive Officer, the Director of Human Resources, the Ethics Officer, the Chief Internal Auditor, the BSA Officer and the respective Chairs of the Nominating and Corporate Governance Committee and the Audit Committee have roles and responsibilities under this Code.

3. POLICY ELEMENTS

A. Our Ethical Principles

- i. **Honesty/Trust.** Our business is based on mutual trust and honesty in all our dealings whether internally or externally. We must adhere to and demonstrate the principle of honesty at all times in both our personal and corporate behavior to ensure the trust of our stockholders, customers and employees.
- ii. **Integrity.** Our business creates opportunities that can be realized only if we demonstrate the integrity of the Company, as well as the integrity of our employees. We therefore use corporate assets, including our name, with the care befitting a valuable resource. We will not engage in manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair dealing practice.

- iii. **Respect.** We treat one another with respect and dignity, and we respect and value diverse backgrounds and experiences for an environment supportive of our workforce, customers, and the communities we serve.
- iv. **Responsibility.** We are accountable for our actions and ask for clarification when necessary, and are responsible for reporting concerns or observed violations of this Code.
- v. **Good Citizenship.** We comply with both the intent and spirit of laws that govern our business and stakeholders, thereby contributing to the strength and well-being of our employees, customers and the communities we serve.

B. Risk Tolerances

The Company's Boards of Directors and management are committed to operating the Company in a safe and sound manner for the benefit of its stakeholders. The Company's Boards of Directors and management does not have a tolerance for:

- unethical behavior or other forms of misconduct (i.e., demonstrating willful intent);
- unauthorized communications, unlawful business activities or any conduct that could result in material financial loss, misstatement, reputation risk, or regulatory enforcement action(s);
- loss or misuse of customer or confidential information;
- failure to provide a safe and secure work environment, and failure to respect and protect the personal information of our employees, officers and directors; and
- wrongdoing (i.e., illegal activities).

C. Monitoring & Controls

- i. **Accurate Record Keeping and Accounting.** We require complete and accurate recording and reporting of financial and other information both to make responsible business decisions, and to provide accurate reporting of our performance to shareholders, regulators, depositors, and employees. We require full, fair, accurate, timely, and understandable disclosure in all reports and documents we file with, or submit to the Securities and Exchange Commission ("SEC") and regulators, and in other material public communications. It is a violation of law and our policy for any employee, officer, or director to attempt to improperly influence or mislead the financial reporting process or our accountants who audit our financial statements. Our financial and other reporting must fairly present the financial condition, results of operations and cash flow of the Company, and it must comply in all material respects with applicable law, governmental rules and regulations, including generally accepted accounting principles and applicable rules of the SEC, the stock exchange on which the Company's shares are listed, and banking regulators.

We have implemented disclosure controls and procedures and internal controls and procedures to ensure that our public disclosures are timely, comply with laws and regulations, and are otherwise fair, accurate, and understandable. Employees, officers, and directors

responsible for the preparation and review of our public disclosures, or who provide information as part of that process, have a responsibility to ensure that such disclosures and information are complete, accurate and comply with our Company's disclosure controls and procedures.

- ii. **Document Retention and Destruction.** Employees, officers, and directors must fully comply with our document retention and destruction policy. In addition, once a legal proceeding has begun (or when one is threatened or reasonably likely), federal and state obstruction-of-justice statutes require us to preserve documents relevant to the issues in that proceeding even before specific documents are requested. Any employee, officer, or director, who fails to comply with this policy, as well as industry regulations and state and federal laws, is subject to termination or removal and may also face criminal or civil prosecution, with possible fines and prison terms.
- iii. **Confidentiality of Information and Insider Trading.** Employees, officers and directors who have access to confidential information are not permitted to use or share that information for any purpose except the conduct of our business. Non-public information regarding the Company, or our customers, and our employees is confidential and should be safeguarded appropriately. The Company routinely receives subpoenas in civil, criminal, and regulatory matters. It is a violation of this Code of Conduct to disclose the existence of a grand jury subpoena other than to individuals within the Company who have a business need to know or as otherwise authorized by law. Any use of non-public information for personal financial benefit or to "tip" others who might make an investment choice based on this information is both unethical and illegal. Please consult the Company's Ethics Officer (see Section 3(H)) for further details on this topic. See also the Policies and Procedures Regarding Insider Trading and the Confidentiality of Information.
- iv. **Regulatory Agencies, Auditors and Counsel.** Honesty, candor, and cooperation are required in dealing with our independent and internal auditors, and attorneys. Any request by regulatory or governmental agencies for information, which is not incidental to periodic bank and holding company examinations and required reports, should be referred to our General Counsel.
- v. **Competition and Fair Dealing.** Competition requires fair dealing with customers, competitors, and with third-party suppliers, service providers, and technology providers (collectively, "Vendors"), and fellow employees. We compete based on achieving advantage in the marketplace through superior service, competitive interest rates, and ethical business practices. Accordingly, it is against our policy to attempt to win or keep business relationships based on unethical or illegal activities. Employees, officers, and directors must not attempt to obtain unfair advantage over customers, competitors, Vendors, or fellow employees through manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.
 - a. **Anti-Competitive Activities.** Federal and state law prohibits any combination, conspiracy, or agreement among competitors to restrict or prevent competition. Violations can occur through both formal and informal agreements between the Company and a competitor to fix prices, allocate markets or customers, or refuse to deal with particular Vendors or customers. All employees, officers, and directors should be

especially careful at social or professional meetings to avoid discussions or exchanges of information relating to competitive matters (i.e., cost, pricing, or strategy). Employees, officers, or directors with questions concerning any such antitrust issues should be directed to our General Counsel.

- b. Third-party service providers.** Employees, officers, or directors who select or work with third-party service providers for the Company are required to be objective and fair and employ professional business practices when selecting sources, in negotiations, in awarding business, and in the administration of purchasing activities. Although we expect employees, officers, and directors to strive for good relationships with Vendors, it is wrong to create even the impression that a Vendor has a “friend” at the Company and can therefore exert special influence.
- vi. Safeguarding and Proper Use of Our Assets.** Our employees, officers and directors are bound by this Code to protect our assets, ensuring they are used only for legitimate business purposes. Such assets include, but are not limited to, capital, funds, facilities, equipment, proprietary information, technology, business plans, ideas for new products and services, trade secrets, inventions, copyrightable materials and customer lists.
 - a. Corporate Assets.** Employees, officers, and directors entrusted with the Company’s funds and other assets are personally responsible for the handling of those assets and shall not (i) misappropriate such assets, even on a temporary basis or (ii) use any assets of the Company for any unlawful or improper gifts, payments to customers, government officials or other third parties.
 - b. Physical Assets.** Employees, officers, and directors entrusted with use of our physical assets (such as computer equipment, corporate charge cards, telephones and office supplies) must protect them from loss, damage, misuse or theft. These assets must be kept secure at all times, and should be used only to conduct our business and for purposes authorized by management.
 - c. Information Technology.** Our information systems, such as internet access, e-mail and software programs are vital to conducting our business and, accordingly, are to be used primarily for business purposes. Although the Company permits a reasonable amount of personal internet use for its employees, certain restrictions have been implemented regarding its use due to the inherent risks related to the use of the internet. All terms of the Company’s Internet Use Policy and Acknowledgement, Electronic Communication Policy and Acknowledgement, Computer Policy and Acknowledgement, Remote Access and Mobile Device Security Policy and Acknowledgement and Corporate Social Media Marketing Policy (including the Employee Social Media Rules and Guidelines in the Employee Handbook), are incorporated into this Code of Conduct and Ethics by reference. Visiting sites with political, sexual, racial, or hate content, as well as gambling-related sites and sites in any way related to unlawful activity is strictly prohibited. All data stored in computer systems, such as data files or word processing documents, must be treated as proprietary information. Our Information Technology policy sets the standards relating to the use and protection of computer and information assets, and employees, officers, and directors must adhere to this policy.

- d. Self-Dealing with Customer or Employee Information.** Employees, officers, and directors shall not access, disclose, or use confidential customer or employee information for their own personal benefit or without a business purpose.
- vii. Conflicts of Interest.** Employees, officers and directors are expected to make business decisions on behalf of the Company free from conflicting outside interests. It is a violation of this Code and of our policies to foster personal or business interests (or those of others with whom such persons have a personal or business relationship) at the expense of the Company.

Although it is impossible to cover every potential conflict of interest situation, a potential conflict exists whenever an employee, officer, or director of the Company has an outside interest, direct or indirect, which conflicts with their duty to the Company or adversely affects their judgment in the discharge of their responsibilities to the Company. Examples of conflicts of interest include receiving money or other benefits from a third party in return for the Company granting a loan to or purchasing property or services from such third party; advocating a transaction between the Company and another entity in which such person owns stock or otherwise stands to benefit from the transaction at the expense of the Company; a hiring manager, or a member of the Company's management failing to disclose that they are related to a potential job candidate; or offering a government employee a meal or other gratuity that the government employee could have reason to believe is being offered to them with intent to influence them. Please see Schedule 1 annexed hereto for more information related to conflicts of interest.

The appearance of a conflict of interest, like an actual conflict, can result in regulatory, operational, reputation, or financial risk, and may be difficult to recognize. Our employees, officers and directors are expected to objectively assess their actions periodically to determine whether a reasonable, disinterested observer, a customer, a Vendor, a shareholder, an acquaintance, or a government official would have grounds to believe a conflict of interest exists, and should discuss any appearance of a conflict of interest with our Ethics Officer. In addition, directors and executive officers will report the conflict or appearance of conflict to the Nominating and Corporate Governance Committee.

viii. Confidentiality and Privacy.

- a. Nonpublic Information.** Employees, officers, and directors are required to maintain the confidentiality of information entrusted to them by the Company and provided by our customers, employees and third-party service providers. Confidential information includes all non-public information that might be of use to competitors, or harmful to us or to our customers, if disclosed. It also includes non-public information about our financial condition, results of operations, business operations, and future prospects. All employees, officers, and directors must exercise care not to misuse nonpublic information obtained during their employment, including customer lists, information about our employees and customers, and business plans and ideas. See also the Policies and Procedures Regarding Insider Trading and the Confidentiality of Information. **THE OBLIGATION TO PRESERVE CONFIDENTIAL INFORMATION CONTINUES EVEN AFTER EMPLOYMENT ENDS.**

The obligation to maintain the confidentiality of information however may be subject to legal or regulatory requirements to disclose that information. Discuss your concerns with

your manager or the General Counsel if you have any questions regarding what constitutes confidential information or when such information must be disclosed.

- b. Customer and Employee Information Privacy.** We protect the confidentiality and security of customer and employee information. While the Company does not have a formal policy governing employee information privacy, it does have a policy governing Customer Information Privacy and such policy should be referenced for more detailed information.

Our Customer Financial Information Privacy Policy provides, among other things, that:

- We do not sell or rent customers' personal information.
- We do not release customer information to third parties, except upon a customer's authorization or when required by law. Employees, officers, and directors may not discuss or share electronically or in writing the business affairs of any customer with any other person, except on a strict need-to-know basis.
- Third-party service providers with access to customer information are required to keep customer information confidential and use it only to provide services to or for the Company.

- ix. Our People.** We are committed to treating everyone with respect and dignity. It is the policy of the Company that all employees should be able to work in an environment free from discrimination or harassment, including discrimination or harassment on the basis of an individual's race, color, ethnicity, national origin, religion, sex, age, sexual orientation or preference, genetic information, gender identity or gender expression, marital or family or domestic/civil partnership status, pregnancy status, employee's or dependent's reproductive decision making, disability, domestic violence victim status, status as a victim of sex offenses or stalking, military status, arrest or conviction record, credit history, citizenship, veteran status, salary history, unemployment status, any lawful source of income, caregiver status or any other characteristic protected by applicable federal, state, or local law, rule or regulation (collectively, "Protected Categories"). We will strive to provide a safe and secure work environment, and to respect and protect the personal information of our employees, officers and directors. For additional information, contact the Director of Human Resources.

- a. Equal Opportunity.** We are committed to being an equal opportunity employer, committed to ensuring that our workplace is free from discrimination. As such, we will recruit, hire, train, and promote individuals in accordance with all applicable laws and regulations, without regard to any of the Protected Categories.
- b. Harassment-Free Work Environment.** One objective of this Code is to prohibit unprofessional behavior that compromises trust, the quality of the work environment, or the integrity of decision-making. Each of us is expected to treat our fellow employees, officers and directors with professional courtesy and act in a manner consistent with ethical business practices.

Behaviors that harass an employee, officer or director are prohibited, including on the basis of any of the Protected Categories. Forms of such harassment can include physical,

verbal, and nonverbal behavior that harasses, disrupts, or interferes with work performance or in any way creates or contributes to an intimidating, fearful, hostile, or offensive work environment. These behaviors include, by way of example only, off-color jokes, threats, and derogatory e-mails or drawings. Similarly, favoritism, belittling others, and verbal outrages undermine the dignity and respect due to all employees, officers and directors.

Without limiting the foregoing statements, sexual harassment is one form of conduct that undermines the integrity of the employment relationship. For purposes of this policy, sexual harassment is defined as any behavior or communication of a sexual nature that is unwelcome, is personally offensive, or creates a hostile, intimidating, or offensive work environment. We will not tolerate sexual harassment of applicants for employment, employees, officers, or directors by anyone—employees, officers, directors, third-party service providers, or customers.

- c. **Health and Safety.** Providing a safe and secure work environment is fundamental. Employees, officers and directors are responsible for complying with applicable health and safety rules. Accordingly, each person should take appropriate measures to protect their physical security and observe safe and responsible work practices, such as adhering to local building access security procedures, promptly reporting to management any job-related injury or illness, and following Company security manuals. Moreover, violence, threats of violence or perceived threats of violence by any employee, officer, or director against any other employee, officer, or director are prohibited. Likewise, weapons of any kind are prohibited at our locations.
- d. **Substance Abuse.** Being under the influence of alcohol, marijuana, or illegal drugs, or improperly using medicines, prescribed or otherwise, can diminish one's ability to do their job, and can compromise the safety of others. You should not work in an impaired state or allow substances to interfere with the safety or productivity of those around you. This policy also prohibits the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance on the Company's premises, in our vehicles, or while conducting Company business.

D. Reporting Requirements

The Ethics Officer, reporting to the Chief Risk Officer, is responsible for administering and enforcing this Code for employees and non-executive officers. The Nominating and Corporate Governance Committee is responsible for administering and enforcing this Code for directors and executive officers. The Audit Committee is responsible for administering and enforcing the Code of Conduct and Ethics for Senior Financial Officers. The Ethics Officer and the Chief Internal Auditor report to the directors regularly.

E. Procedures for Receipt, Retention and Treatment of Complaints Received

- i. **Prompt Confidential Reporting of Code Violations.** Any employee, officer or director who becomes aware of a violation or alleged violation of this Code, including concerns regarding internal accounting controls, suspected fraud, or questionable accounting or auditing matters (any such violation or alleged violation of this Code is referred to as a "Code

Violation”), should promptly report such violation. To encourage employees, officers, and directors to fulfill their obligations under this Code, we have established procedures under which any employee, officer, or director suspecting that a Code Violation has been or is being committed, may report the facts in a manner that will safeguard the person’s identity, to the fullest extent practicable, and protect the reporting person against retribution. All persons subject to this Code should report Code-related matters in accordance with the following protocols:

- Officers and employees should promptly make reports of any Code-related matters to their immediate supervisor and simultaneously to the Ethics Officer.
- Supervisors receiving such reports should promptly advise the Ethics Officer, even when the Ethics Officer has already been advised.
- Directors shall promptly make reports of any Code-related matters to the CEO, the Ethics Officer, or the Chair of the Audit Committee.

The procedure for making such a report is as follows:

- a. Any employee or officer who becomes aware of a past or present Code Violation should promptly report the facts and circumstances to their immediate supervisor, and simultaneously to the Ethics Officer. Once the supervisor has been advised of a Code Violation, the supervisor should promptly confirm the matter with the Ethics Officer. The Audit Committee in particular will be notified promptly about any Code Violation regarding accounting or auditing matters as well as the full board at its next regular meeting unless, in the judgment of the CEO, the matter needs to be addressed sooner.
- b. An investigation into the reported Code Violation will be conducted promptly by the Ethics Officer in consultation with the CEO, and as appropriate, the Director of Human Resources, and/or the Audit Committee. Facts and circumstances in the report will be reported so as to protect, to the greatest extent possible, the anonymity of the reporting person.
- c. If the Ethics Officer and the CEO are not able to promptly resolve a Code Violation to their mutual satisfaction, the Ethics Officer and the CEO shall promptly confer with the Audit Committee to resolve it consistent with this Code and applicable laws and regulations.
- d. Illegal or criminal conduct will also be reported to our primary regulators and any law enforcement agencies with jurisdiction, consistent with confidentiality and the protection of applicable privacy privileges, and as appropriate with the assistance of the BSA Officer. We will cooperate fully with such authorities in their prosecution of parties responsible for impermissible, illegal, or criminal conduct.
- e. In the event of legal proceedings, the reporting person(s) may be deposed, interviewed, and asked to testify, just as any other person having knowledge of the relevant facts and circumstances would be. We will seek to protect the identity of the reporting person to the greatest extent practicable.

Subject to applicable laws and regulations, employees, officers or directors who willfully fail to report a Code Violation or who fail to cooperate in an investigation of a Code Violation may be subject to disciplinary action, up to and including termination of employment, or in the case of a director, removal from the Board of Directors.

- ii. **Permissible Transactions with the Company and Other Matters Not Involving a Code Violation.** The Ethics Officer shall promptly review all reports of Code-related matters. The Ethics Officer shall confer with the appropriate officers to determine if the requested transaction or other matter complies with all applicable laws, regulations, and policies. If deemed necessary by the Ethics Officer, the Ethics Officer shall seek the advice of our outside legal counsel. The Ethics Officer shall promptly advise the filer of the report as to our determination.
- iii. **Investigation and Resolution of All Code Violations.** The Ethics Officer (or designee as approved by the Board of Directors if the Ethics Officer is unable or not appropriate to do so) shall promptly investigate all violations or alleged violations of any provision of this Code. Concerns regarding internal accounting controls, questionable accounting or auditing matters that have been reported to the Ethics Officer should be forwarded by the Ethics Officer to the Chair of the Audit Committee.

When appropriate, the Ethics Officer shall promptly report any Code Violation to the Chief Executive Officer with recommendations for resolution, in accordance with the investigation and referral procedures described herein. To the extent a Code Violation involves the Chief Executive Officer, the Chair of the Nominating and Corporate Governance Committee should be informed of the possible Code Violation and the response planned or executed.

We will take appropriate action to resolve Code Violations. Such resolutions may involve disciplinary actions or other sanctions including termination of employment or dismissal. We will take all reasonable steps to respond to any offense and prevent its recurrence.

- iv. **Whistleblower Reports.** Please note that reports regarding accounting matters should be made in accordance with the Company's Whistleblower Policy and Reporting Procedures and that such reports may also be made confidentially and anonymously in accordance with such Policy.
- v. **Requests for Waivers.** A "waiver of this Code" is defined as a material departure from a provision of this Code. As a general rule, a waiver of this Code will not be approved unless necessary and warranted. It is anticipated that waivers will be granted only under exceptional or limited circumstances.

The procedure for requesting a waiver of this Code is to seek approval from:

- a. The Nominating and Corporate Governance Committee - if the waiver sought relates to any Director, Executive Officer, or any Senior Financial Officer (as defined in the Code of Conduct and Ethics for Senior Financial Officers), with appropriate consultation with the Audit Committee, as applicable.

- b. The Ethics Officer - if the waiver sought relates to any other employee. The determination shall be made by the employee's immediate supervisor, in consultation with the Ethics Officer unless such request is quantitatively or qualitatively material or outside the ordinary course of business, in which case such determination shall be made by the Nominating and Corporate Governance Committee.

The decision with respect to the waiver request shall be documented by the Ethics Officer for filing and retention, with a copy to the Nominating and Corporate Governance Committee and Audit Committee, as applicable. All waivers of this Code shall be reported promptly by the Nominating and Corporate Governance Committee or the Ethics Officer, as applicable, to the Board of Directors. The Company will disclose any waiver of this Code in the manner required by applicable law, rule or listing standard.

- vi. **Retention.** Reports documenting completed investigations will be confidentially maintained for no less than one year.

F. Sanctions for Code Violations. Failure to comply with this Code may result in disciplinary action, ranging from a reprimand to termination or removal and possibly civil and/or criminal prosecution. Disciplinary actions will be pursued against all of the following: (i) any employee, officer or director violating this Code; (ii) any employee, officer or director deliberately withholding information regarding a Code Violation; (iii) the manager or immediate supervisor of a person who has committed an act under (i) or (ii), in circumstances where such violation reflected poor supervision or lack of diligence; and (iv) any employee, officer or director who retaliates, directly or indirectly, against any employee who reports a suspected Code Violation. In addition, Code Violations may expose the offending employee, officer, or director and the Company to monetary damages, regulatory penalties, and criminal sanctions. We will ensure that all disciplinary actions taken to enforce this Code are applied consistently and in accordance with all applicable laws and regulations.

G. Training Requirements. The Ethics Officer is responsible for ensuring all employees, officers and directors receive annual Code-related training (including anti-bribery training), maintaining all Code-related records and investigating and resolving all Code-related matters. In addition, no less than annually all employees, officers and directors are required to affirmatively acknowledge receipt, understanding and compliance with this Code in substantially the form of Acknowledgement annexed hereto.

H. Your Code of Conduct and Ethics Resources. To report a Code Violation or ask a question (in addition to other resources referenced herein):

- If your question or concern is related to accounting controls, questionable accounting or auditing matters, contact the Audit Committee Chair at 718-448-2706.
- If your question or concern is related to any other type of Code Violation or Code matter, contact the Ethics Officer at (732) 499-7200, extension 4156, or send an email to EthicsOfficer@enorthfield.com. (This email account is monitored by Susan Aufiero-Peters, Esq., SVP and Ethics Officer.)

4. EXCEPTIONS TO THIS POLICY

Please follow the procedures described in the section entitled “Requests for Waivers” (See Section (3)(E)(v)).

5. RELATED DOCUMENTS

- A. Affirmative Action and Equal Employment Opportunity Policy Statement
- B. Code of Conduct and Ethics for Senior Financial Officers
- C. Computer Policy and Acknowledgement
- D. Corporate Social Media Marketing Policy
- E. Customer Financial Information Privacy Policy
- F. Electronic Communication Policy and Acknowledgement
- G. Employee Handbook
- H. Enterprise Risk Appetite Statement Policy
- I. Information Technology Policy
- J. Internet Use Policy and Acknowledgement
- K. Policy and Procedures Regarding Insider Trading and the Confidentiality of Information Policy and Addendum
- L. Records Retention and Destruction Policy
- M. Remote Access and Mobile Device Security Policy and Acknowledgement
- N. Security Manual
- O. Third Party Relationships Risk Management Policy and Program
- P. Whistleblower Policy and Reporting Procedures

6. APPROVAL AND ADOPTION HISTORY

	Date of Approval
1. Nominating and Corporate Governance Committee of the Board of Directors	11/24/09, 11/22/10, 7/27/11, 12/20/11, 2/27/13, 12/18/13, 11/19/14, 12/16/15, 11/16/16, 11/15/17, 7/25/18, 11/28/18, 1/29/20, 11/18/20, 11/17/21, 2/22/23, 11/22/23, 11/27/24, 11/19/25.
2. Board Adoption	11/24/09, 11/22/10, 7/27/11, 12/20/11, 2/27/13, 12/18/13, 11/19/14, 12/16/15, 11/16/16, 11/15/17, 7/25/18, 11/28/18, 11/18/20, 11/17/21, 2/22/23, 11/29/23, 12/4/24, 11/19/25.
3. Date of Next Annual Review	11/18/26



SCHEDULE 1

CONFLICTS OF INTEREST

A. Giving and Receiving Gifts. Employees, officers and directors or their close family members should not accept any gift, regardless of its value, that might appear to compromise independent business judgment. Neither should employees, officers or directors give a gift to a customer, third-party service provider, or prospect that might appear to be an attempt to influence them. Gifts include cash, material goods, services, promotional premiums, knowingly accepting a discount, and receipt of a loan. When the value of the gift is appropriate to an occasion (e.g., holidays), and permitted by law, non-cash gifts may be accepted from, or provided to, customers or Vendors, provided they are valued at \$100 or less. Any gift received over such amount should be politely returned or approval from the Chief Executive Officer (sometimes referred to as the "CEO") obtained prior to acceptance. Gifts are also permitted under this policy in the following circumstances:

- Gifts of reasonable value based on a family or personal relationship where that relationship is the obvious motivating factor for the gift;
- Discounts or rebates on merchandise or services that do not exceed those available to other customers of the merchant;
- Awards for recognition of service or accomplishments from civic, charitable, educational, or religious organizations.

GIFTS OR GRATUITIES TO GOVERNMENT OFFICIALS DESIGNED TO INFLUENCE ANY SUCH PERSON'S JUDGMENT, DECISIONS OR ACTIONS IN CONNECTION WITH ANY CORPORATE OR BANKING ACTIVITY ARE INAPPROPRIATE, POSSIBLY ILLEGAL AND ARE STRICTLY PROHIBITED.

B. Business Functions and Entertaining. Meals, refreshments, entertainment, accommodation, or travel arrangements of a reasonable value may be accepted if they are provided in the course of a meeting or occasion, the purpose of which is to hold bona fide business discussions or to foster better relations, and provided that the expense would be paid for by the Company if not paid for by another party. Customary and reasonable business and related development practices, consisting of appropriate entertainment events, including meals, theater tickets, and single event sports tickets, are not prohibited by this Code, so long as they are provided in the course of a meeting or occasion. Such activities are prohibited if they are or may appear to be lavish. Frequent entertaining could appear to influence the judgment of the person being entertained. The purchase of tickets to fundraising events sponsored by non-profit organizations is considered a "normal business practice."

Invitations received by employees and officers that may seem inappropriate must be discussed with the Executive Vice President responsible for your functional area prior to acceptance. In matters involving Executive Vice Presidents or above, such invitations must be discussed with the CEO prior to acceptance. Invitations involving the CEO or a director should be discussed with the Chair of the Nominating and Corporate Governance Committee.

- C. Relationships with Outside Interests.** Employees, officers and directors must avoid conflicts and the appearance of conflicts between personal or business interests and the interests of the Company. Employees, officers, and directors may own securities (e.g., debt or stock) in entities who are competitors or customers, without providing immediate notification to the Company. Employees, officers and directors must not act on behalf of the Company in any transaction involving persons or organizations with which the employee, officer, or director, or a family member thereof, has any personal, financial, or residual interest without first providing written disclosure of such interest to the CEO (in the case of an Executive Vice President), or the Board (in the case of the CEO or a director), or the Ethics Officer (in all other cases) as applicable. A family member includes a person's spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, and brothers and sisters-in-law. The CEO or Board or Ethics Officer, as applicable, will review any personal disclosures and make a recusal determination promptly and will advise the employee, officer or director, in writing, if additional actions must be taken. Additionally, the employee, officer or director must recuse him or herself from any decision making process when it appears such person or such person's family member's personal, financial, or residual interest presents a conflict or is sufficient that a conflict could be perceived. Such recusal shall be clearly documented in the minutes of any meeting at which the conflict or appearance of conflict is discussed.

Relationships, other than normal and customary relationships at prevailing terms that an employee, officer or director may have with Company Vendors (for example, home improvement services, security firms, attorneys, lawn services, or automobile repair shops), should always be disclosed in writing to Human Resources or the Corporate Secretary (in the case of directors) prior to its commencement, and must be approved in writing in advance.

Employees and officers who serve in a "financial oversight role" are not permitted to receive any tax services from the Company's independent auditors. The prohibition extends to the employee or officer's Immediate Family Members. Immediate Family Member is defined as "spouse, domestic partner, or dependents." The characteristic that identifies a "financial reporting role" is the ability to exercise influence over the contents of the financial statements of the Company or anyone who prepares them. The following roles are among those that meet the criterion: chief executive officer; president; chief financial officer; chief administrative officer; general counsel; chief accounting officer; controller; director of internal audit; director of financial reporting; treasurer; and chief risk officer.

Tax services to a director are permitted provided the director does not also function in any of the other financial reporting oversight roles noted in the immediate above paragraph.

Approving or processing transactions for your personal accounts, the accounts of family members or anyone with whom you have a business or personal relationship (financial or otherwise), or accounts in which you have a personal financial interest or on which you're an authorized signer are prohibited transactions.

- D. Outside Employment and Directorships.** We do not prohibit outside employment or directorships (or similar fiduciary role); however, it is the Company's expectation that employment priority be demonstrated by all employees, and they devote their complete attention and energy to their duties, while at all times, acting in the best interests of the Company. All employees, up through and including

Executive Vice President, must notify their immediate supervisor and the Director of Human Resources and request approval in writing prior to accepting or continuing any outside employment or directorship of an outside organization. All requests must be reviewed and approved by their immediate supervisor, the Director of Human Resources, and the executive officer responsible for the employee's functional area. Outside employment and directorships will not be approved which might subject the Company to criticism or which would encroach on working time, interfere with regular duties, or otherwise affect an individual's effectiveness.

Employees and officers are prohibited from outside employment and board memberships that may appear to create a conflict of interest. Please see below examples of prohibited outside activities. This section should not be construed as prohibiting or discouraging an employee or officer from serving as a volunteer at a non-profit organization. Please see the Northfield Bank Community Service and Volunteer Program.

Examples of prohibited outside activities include, but are not limited to:

- Engaging in any activity that competes with the Company.
- Employment which involves the use of our equipment, supplies, or facilities.
- Employment which involves the preparation, audit or certification of financial statements, tax returns, or other documents upon which we may rely for lending or other decisions. Employees who prepare income tax returns for individuals or entities other than themselves must obtain confirmation that the customer does not intend to use the officer's or employee's work product as part of any transaction with the Company.
- Employment which involves giving investment, legal or other advice, or exercising judgment which is based upon information, reports, or analyses that are accessible from the Company.
- Employment that could create a conflict of interest, compromise the integrity of the officer or employer, or expose the Company to regulatory, operational, reputation or financial risk is prohibited.
- Employment under circumstances which may suggest the sponsorship or support of the Company on behalf of the outside employer or an outside organization.
- Employment with other banks, credit unions, financing companies, or loan brokers.
- Employment as an insurance or securities broker, agent or representative.
- Employment as a real estate sales agent, broker, or contractor.
- Viewing customer account information (including employee customers) for non-business reasons.



ACKNOWLEDGEMENT

Your Personal Commitment to Our Code of Conduct and Ethics for Employees, Officers and Directors

All employees, officers and directors of Northfield Bancorp, Inc. and Northfield Bank (together with their affiliates, the “Company”) are responsible for reading, understanding, and complying with the practices outlined in the Code of Conduct and Ethics.

Employees, officers, and directors are required to affirmatively acknowledge receipt, understanding, and compliance with the Code of Conduct and Ethics.

I acknowledge that I have received and will comply with the Code of Conduct and Ethics. I understand and agree that the Code of Conduct and Ethics is not an employment contract between the Company or, without limitation, Northfield Bank and me.

I understand that if I have questions related to the Code of Conduct and Ethics, I am to discuss them promptly with my manager (Branch or Department), Human Resources, or the Ethics Officer.

Date: _____

Signature: _____

Printed Name: _____

Title: _____
