Adopted Effective October 22, 2026

Wintrust Financial Corporation

Corporate Code of Ethics



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Corporate Code of Ethics

Overview of the Code

The Board of Directors of Wintrust Financial Corporation (the "Board of Directors") has adopted this Code of Ethics (the "Code") to provide our employees, vendors, clients, shareholders and members of the general public with an official statement of the fundamental principles that govern how Wintrust Financial Corporation ("WTFC"), the Wintrust Banks and all our subsidiaries (together, the "Company") conduct themselves in the marketplace.

The Code governs the actions and working relationships of the Company's directors, officers and employees with current and potential customers, suppliers, fellow employees, competitors, governments and self-regulatory agencies, the media and anyone else with whom the Company has contact. Under the Code, our directors, officers and employees should conduct business for the Company in the full spirit of honest, ethical and lawful behavior and should not cause another employee or non-employee to act otherwise, either through inducement, suggestion or coercion. In addition, our banks, broker-dealer and investment adviser subsidiaries also require their employees to abide by detailed standards of ethical conduct they have adopted in accordance with regulations applicable to them. In addition, the Company's senior financial officers are subject to the Company's Senior Financial Officers Code of Ethics, which supplements this Code.

The purpose of the Code is to deter wrongdoing and to promote: (1) honest and ethical conduct, including the ethical handling of conflicts of interest; (2) full, fair, accurate, timely and understandable disclosure in periodic reports; and (3) compliance with applicable laws, rules and regulations.

Purpose

The Code, among other things:

- Requires the highest standards for honest and ethical conduct, including proper procedures for dealing with actual or apparent conflicts of interest and proper management of one's personal financial affairs.
- Requires compliance with applicable laws, rules and regulations.
- Requires that information provided and records maintained be accurate, complete, objective, timely and understandable.
- Addresses misuse or misapplication of Company property and corporate opportunities.
- Requires the highest level of fair dealing and confidentiality within and outside the Company.
- Requires reporting of any illegal behavior.
- Provides methods by which directors and employees may obtain clarification regarding, request waivers from, or report suspected violations of, the Code.

Scope and Administration

The Code applies to all directors, officers and employees of the Company, including the directors, officers and employees of each of its subsidiaries. All directors and employees should be familiar with the Code. All directors and employees will be asked annually to read the Code and sign an acknowledgment agreeing to comply with the Code, including without limitation the provisions of Section 2.8 regarding reporting of violations and seeking necessary waivers. This Code is not a contract (express or implied) but rather a pronouncement of our desire to promote exemplary ethical behavior by our directors, employees and agents in the conduct of all of our business affairs.

Neither the adoption of this Code nor any description of its provisions constitutes a representation of full compliance with this Code. This Code does not, in any way, constitute an employment contract or an assurance of continued employment. This Code is not intended to create any third-party rights and should not be construed to do so.

Requirements

1.0 Code Governance

1.1 Code Administration

Administration of this Code is the responsibility of the WTFC Chief Legal Officer subject to Code review/approval, revisions, and exception requirements outlined in Sections 1.2, 1.3 and 1.4 below, with oversight from the WTFC Board of Directors.

1.2 Code Review and Approval

The WTFC Enterprise Risk Management Committee ("WC-ERMC"), the Ethics Committee, the Audit Committee ("WC-AC") and the Nominating and Corporate Governance Committee ("WC-NCG") evaluate this Code at least annually or more frequently as necessary (e.g. when material changes are required) and recommend approval to the WTFC Board of Directors. The WTFC Board of Directors approves this Code annually or more frequently if required.

1.3 Code Revision and Approval

Any revisions to this Code are subject to review by the WTFC Chief Legal Officer and approval by the Ethics Committee, WC-ERMC, and the WC-NCG, and, in the case of any material revision, approval by the WTFC Board of Directors.

1.4 Exceptions to Code

Exceptions to this Code, or any breaches in related Risk Appetite/KRI (i.e. "red indicators"), are to be reported to the Code Owner and the WC-ERMC. Exceptions can either be:

a) Acknowledged and accepted by the WC-ERMC in line with the WTFC Risk Acceptance Standard; or

b) Required to put a remediation plan in place.

In cases where the WC-ERMC determines a remediation plan is required, the action plan should be documented in the committee meeting minutes including actions to be taken, the timing by which actions are to be completed, and the parties responsible for completing the actions.

Progress related to action plans are to be reported to the WC-ERMC at a frequency determined by the committee until they are completed and closed by the committee.

2.0 Code Requirements

2.1 Conflict of Interest

Directors, officers and employees of the Company must avoid situations where their personal interests could conflict or appear to conflict with the interests of the Company or its shareholders. Conflicts of interest may arise when an individual's position or responsibilities with the Company present an opportunity for personal gain apart from the normal compensation provided through employment.

Any position or interest, financial or otherwise, which could materially conflict with your performance as a director, officer or employee, or which affects or could reasonably be expected to affect your independence or judgment concerning transactions between the Company, its customers, suppliers, shareholders or competitors or otherwise would be a conflict of interest.

To help you avoid conflicts (and the appearance thereof), the following guidelines have been developed:

Use of Corporate Funds and Assets

The assets of the Company are much more than our offices, furnishings, equipment, cash deposits, corporate funds and computers. They include client lists and marketing concepts, business strategies and plans, investment programs, as well as information about our business. These assets may not be improperly used to provide personal gain for directors or employees. Nor may directors or employees provide others with access to the assets of the Company. The theft of money, property or other assets will not be tolerated.

Any director, executive officer or principal shareholder of the Company using any Company personnel, facility or other real or personal property (e.g., regular use of office space or a vehicle other than a Company-issued car) for personal or non-Company business purposes must submit such proposed use to their applicable board of directors and receive approval that such use is reasonable.

Confidential Information

As part of your job, you may have access to confidential information about the Company, our clients, vendors, business partners, competitors and shareholders. You are only to use such confidential information for the business purpose intended. Unless properly released to the public, this information should not be disclosed to fellow employees who do not have a business need to know or to non-employees for any reason, except in accordance with established corporate procedures.

Confidential information of this sort includes information or data on deposit and loan pricing, business strategies, acquisitions, new branch locations, client information, investment portfolios, corporate manuals, processes, systems, procedures and financial information, as well as other non-public information about the Company (whether or not material to the Company) or information that might be of use to competitors or harmful to the Company, its customers, suppliers, or other stakeholders and third parties if disclosed. Much of the financial information we have about clients is subject to their legal rights to privacy and our privacy and confidentiality policies must be strictly adhered to in order to preserve these rights.

The duty to protect the confidences of the Company and its clients includes avoiding not only intentional disclosures but also taking care to avoid unintentional or indirect disclosure. No director or employee shall disclose in a social media posting, blog, chat room or other social or professional networking site confidential or other information regarding the Company or its business, clients, vendors, business partners, competitors or shareholders. You remain under an obligation to keep all non-public information confidential even after your employment with the Company ends.

The obligation to treat information as confidential does not end when an individual leaves the Company. Upon separation from the Company, everything that belongs to the Company, including all documents and other materials containing confidential information, must be returned.

Personal Financial Gain and Investments; Prohibitions on Insider Trading, Hedging and Pledging

- Directors and employees should avoid any outside financial interests that might interfere or unduly influence their corporate decisions or actions on behalf of the Company. This does not prohibit investments in or relationships with other companies that compete with or do business with the Company. Directors and employees, however, may not invest in the securities of a client or supplier with whom they have – or recently had – direct dealings in their role at the Company. A director or employee must ensure that any investment or relationship with another company does not interfere with the director's or employee's exercise of independent judgment in fulfilling his or her responsibilities to the Company.

- Any commission, consulting fee or other compensation (including, e.g., consulting or professional services fees) that the Company pays to a director, executive officer or principal shareholder, or their related interest, must be for services that meet the legitimate needs of the Company, are justified and are reasonable in amount. Insider trading in securities of the Company or tipping non-public material information about the Company to others is a violation of law and is strictly

prohibited for all directors, officers and employees. It is both illegal and unethical to buy, sell, trade or otherwise participate in transactions involving Company common stock or other securities while in possession of material non-public information about the Company, or to disclose such information to third parties. All directors, officers and employees of the Company must also comply with the Company's Insider Trading and Confidentiality Policy, including any restricted trading periods and other trading restrictions applicable to them that are in place from time to time under such policy.

- Engaging in selling short securities of the Company or engaging in hedging or offsetting transactions regarding securities of the Company, including the use of puts, calls, swaps, collars or other derivative securities designed to or that may reasonably be expected to have the effect of hedging or offsetting a decrease in the market value of any securities of the Company, by directors, officers and employees is prohibited.

- Pledging of securities of the Company by Company directors and executive officers is strictly prohibited.

- Directors, officers and employees are prohibited from participating, directly or indirectly, in prediction markets involving the Company or any event, circumstance, transaction, or entity about which the director, officer or employee possesses information obtained through the Employee's employment or relationship with the Company. Participation in a prediction market includes purchasing, selling, or otherwise taking a position in any event contract or similar instrument on a prediction market or similar platform where the value or payout is based on, or linked to, the performance, value, or outcome of any event or circumstance, such as financial results, stock price, corporate events or the completion of a business transaction. As prediction markets continue to proliferate and become increasingly accessible, it is essential to uphold the integrity of our Company and to avoid any actions that may raise even the appearance of impropriety.

If you feel you may have a conflict of interest, including due to your non-Company investments, you should report the potential conflict and seek guidance from your manager or any of the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Chief Legal Officer or Chief Audit Executive.

Outside Activities

Employees should avoid outside employment, investment, business or activities that would have a negative impact on their job performance with the Company, or which are likely to conflict with their obligations to the Company. Before agreeing to act as a director, officer, consultant or advisor for any other business organization, you must notify your manager. An employee who performs work for a company with which we do business or compete must disclose that interest or work to his/her manager.

In addition, you may not accept a personal appointment to act as an administrator, executor, guardian, trustee, or to act in any other fiduciary capacity, except when acting in such capacity for a person related to you by blood or marriage or a close personal friend (so long as the friendship did not arise from a

Company business relationship), without the approval of your departmental supervisor. Where such responsibilities are accepted for a relative and/or approval is obtained, our policies and the law demand the highest standards of good faith in discharging such duties.

No director or officer of the Company may serve at the same time in such a role at an unaffiliated (non-Wintrust) depository institution or depository institution holding company, without first receiving written approval from the WTFC Chief Legal Officer.

Corporate Opportunities

All business opportunities for personal investment that come to the attention of any director, officer or employee of the Company that in any way relate to the business strategy of the Company or any of its subsidiaries are considered "corporate opportunities." Each director, officer and employee is prohibited from using the Company's property, information or his or her position for inappropriate gain, which would include appropriating for themselves, or for any affiliate or family members, business opportunities that properly belong to the Company, whether or not the corporate opportunities are discovered through the performance of duties to the Company.

Extension of Credit

The Company may extend credit to any director, officer or principal shareholder of the Company only on substantially the same terms as those prevailing for comparable transactions with other persons or that may be available to Company employees generally as permitted in accordance with Regulation O of the Board of Governors of the Federal Reserve System and the Federal Deposit Insurance Corporation Improvement Act, and only as permitted by the Sarbanes-Oxley Act of 2002.

Purchase of Assets

The Company may not purchase an asset from, or sell an asset to, a director, executive officer or principal shareholder of the Company, or any related interest of such person, unless the transaction is on market terms and is approved by the WC-NCG and WC-AC as a related party transaction.. Additionally, if the transaction represents more than 10 percent of the capital stock and surplus of the Company, the transaction must be approved in advance by a majority of the WTFC Board of Directors who do not have an interest in the transaction.

Trademarks, Copyrights and Other Intellectual Property

- Trademarks. Company employees and directors must always properly use our trademarks and advise the Company's Chief Legal Officer of infringements by others. Similarly, the trademarks of third parties must be used properly.

- Copyright Compliance. All software or programs created by Company employees and directors in connection with their association with the Company or provision of services to the Company are "works for hire" and are the sole property of the Company. Company employees and directors understand that they have no right, title or interest in any intellectual property created by them

in connection with their employment or provision of services to the Company unless otherwise expressly agreed to in writing by the Company's Chief Legal Officer.

Works of authorship such as books, articles, drawings, computer software and other such materials may be covered by copyright laws. It is a violation of those laws and of the Company's policies to make unauthorized copies of or derivative works based upon copyrighted materials. The absence of a copyright notice does not necessarily mean that the materials are not copyrighted.

- Intellectual Property Rights of Others. It is Company policy not to infringe upon the intellectual property rights of others. When using the name, trademarks, logos or printed materials of another company, including any such uses on the Company's website, individuals must do so properly and in accordance with applicable law.

2.2 Compliance with Laws

In fulfillment of their responsibilities to the Company, all directors and employees are required to conduct themselves in a lawful, professional and ethical manner to promote the Company's compliance with laws of federal, state and local governments applicable to the Company as well as the rules and regulations of private and public regulatory agencies having jurisdiction over the Company. The Company has implemented many policies and procedures designed to ensure compliance with laws and regulations, and employees should make every effort to abide by these policies and procedures at all times. If you have a question as to whether your conduct complies with applicable law or Company policy, please contact your departmental supervisor or the Legal Department.

2.3 Dealing with Clients and Vendors

The following guidelines are intended to help all directors and employees make the appropriate decision in potentially difficult or confusing situations.

"Kickbacks" and Rebates

The extension of loans and purchases or sales of products and services must not lead to directors or employees, or their families, receiving personal kickbacks, rebates or other payments regardless of form, whether in money, property or services.

Gifts and Entertainment

To avoid both the reality and the appearance of improper relations with clients or vendors, the following standards apply to receipt of gifts and entertainment by directors, officers and employees and their immediate family members:

Gifts

- You may not solicit, accept or retain gifts of money under any circumstances nor may you solicit non-monetary gifts, gratuities, or any personal benefit or favor of any kind from any business, firm

or individual doing or seeking to do business with the Company. Moreover, as set forth more fully below, directors, officers and employees of the Company shall abide by applicable anti-bribery laws, including the Bank Bribery Act and related regulations, under which it is a criminal offense for any director, officer or employee of a federally insured bank to corruptly solicit or accept anything of value from any person, firm or corporation intending to be influenced or rewarded, in connection with any business or transaction of the Company.

- You and members of your immediate family may accept unsolicited, non-monetary gifts from a business, firm or individual doing or seeking to do business with the Company but only if: (1) the gift is of nominal intrinsic value; (2) the gift is advertising or promotional material; or (3) the gift is reasonable under the circumstances and otherwise complies with Company or subsidiary policies and procedures applicable to you. Gifts or bequests from family members and gifts or bequests of a nominal value from non-family members are not prohibited.

- The same guidelines set forth above for accepting gifts also apply to giving gifts, subject to additional guidelines set forth herein with respect to gifts to public officials. You may give a gift of nominal value to an external party with whom you maintain an actual or potential business relationship if it is reasonable and customary for the occasion. However, you must not offer or give anything of value that could suggest that you or the Company are attempting to improperly influence decisions relating to the Company, or are otherwise engaging in improper or illegal dealings.

- Gifts between Company employees should be reasonable and must not otherwise adversely impact working or managerial relationships or be in conflict with any other Company policies or incentive plans. Gift cards are acceptable as long as they comply with the other gift guidelines.

Entertainment

- Directors, officers and employees may offer and/or accept meals, invitations to athletic events and other entertainment to or from clients or prospective clients if the entertainment is of reasonable value, appropriate in the context of your position with the Company and the Company's business objectives and in accordance with applicable Company policies. Directors and employees should not, however, encourage or solicit entertainment from a business, firm or individual because they are doing or seeking to do business with the Company.

- All entertainment offered or accepted must facilitate the discussion of business, foster business or professional relationships, or serve some other demonstrable business purpose.

- If entertainment involves travel, accommodations and transportation must not be lavish for the type and venue of the planned event.

- Employees will be reimbursed for entertainment expenses only in accordance with Company policies and procedures as in effect from time to time.

Employees or representatives of certain Company subsidiaries or functions, such as those businesses registered with U.S. securities regulators, may be subject to more restrictive dollar thresholds for gifts and/or additional approval requirements. Such individuals must be aware of and comply with all applicable regulations and policies.

Payments to Brokers, Agents, Consultants

Agreements with brokers, agents, sales representatives and consultants must be in writing and must clearly and accurately set forth the services to be performed, the basis for earning the commission or fee involved and the applicable rate or fee. Payments must be reasonable in amount and commensurate with the value of services rendered.

Anti-Bribery and Corruption

Wintrust is committed to operating in an ethical manner and in compliance with applicable anti-bribery laws and regulations in the United States and other jurisdictions in which it operates. Wintrust employees are prohibited from the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining any advantage as part of their employment. More specifically, employees of Wintrust may not directly or indirectly:

1. Make, promise, approve, authorize, or offer to give to anyone anything of value (including but not limited to cash payments, gifts and entertainment) for the purpose of improperly inducing the recipient to take (or to refrain from taking) action that would bestow a benefit on the Company or any other party; or

2. Receive or accept anything of value (including but not limited to cash payments, gifts and entertainment), if such item of value is intended to induce or reward improper performance of one's responsibilities or duties or to gain an improper advantage. Company employees should not take any actions for the purpose of evading these requirements. For example, a person should not use a third party to do anything that is forbidden within the Code or as implied within this document.

Applicable anti-bribery laws include, but are not limited to, the Bank Bribery Act, the Foreign Corrupt Practices Act ("FCPA"), and Canada's similar Corruption of Foreign Public Officials Act. Various other federal and state laws also prohibit bribery of U.S. public officials as well as commercial bribery in the private sector, or limit the business gratuities that government personnel can accept. Some jurisdictions prohibit gifts of any kind to public officials. Collectively, these laws impose strict requirements regarding offering, providing or accepting gifts and entertainment, and they strictly regulate or prohibit making payments or providing other benefits to public officials. For instance:

- The Bank Bribery Act prohibits any director, officer, employee, attorney or agent of the Company from offering, giving or receiving anything of value that is offered with the intent of influencing any Company business or transaction. Violation of this law is a felony punishable by imprisonment up to five years as well as substantial monetary penalties.

The FCPA governs the worldwide activities of the Company's directors, officers, employees and agents. It prohibits offering, promising, paying or authorizing payment of money, gifts, or anything of value to a foreign official to influence any act or decision, or to seek any improper advantage to help the Company obtain or retain any business. The consequences of violating the FCPA are severe, including possible civil and criminal penalties for both the individual and the Company. Employees found to violate applicable Wintrust policies may be subject to disciplinary action by Wintrust and also may subject themselves to civil and criminal fines and prosecution under the FCPA and similar laws.

2.4 Financial Books and Records

False or artificial entries shall not be made in the books or records of the Company for any reason; to do so may result in criminal and/or civil penalties to the Company and/or employee. No employee may engage in an arrangement that in any way may be interpreted or construed as misstating or otherwise concealing the nature or purpose of any entries in the financial books and records of the Company. The Company's policy is to make full, fair, accurate, timely and understandable disclosures in reports and documents filed with, or submitted to, the Securities and Exchange Commission (the "SEC") and in the Company's public statements and directors, officers and employees involved in the preparation or review of these reports, documents and statements must promote these objectives.

Falsification of Records

No payment or receipt on behalf of the Company may be approved or made with the intention or understanding that any part of the payment or receipt is to be used for a purpose other than that described in the documents supporting the transaction. "Slush funds" or similar funds or accounts where no accounting for receipts or expenditures is made on the Company's books are strictly prohibited.

Retention of Records

All employees must comply with the Company's records retention policies applicable to their area of operations. Destruction, concealment or falsification of any documents required by law to be retained is strictly prohibited.

If you are notified that documents and records in your possession are relevant to any pending or contemplated litigation or an investigation or audit, do not alter, delete or destroy the records, and follow the guidelines set forth in the notification. This may require you to affirmatively preserve from destruction all relevant records that, without intervention, would automatically be destroyed or erased (such as emails and voicemail messages). Destruction of such records, even if inadvertent, could seriously prejudice the Company.

2.5 Fair Dealing

All directors and employees of the Company must uphold the highest standards of fair, honest and ethical conduct in all business dealings with clients, other employees, vendors, partners and competitors, shareholders and the general public. No one should take advantage of another through manipulation,

concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practices.

Information About Competitors and Antitrust Laws

In business, it is inevitable that the Company and its competitors will meet and talk from time to time. This is neither against the law nor to be avoided. What must be avoided, at all costs, is collaboration with competitors in violation of the law on such things as pricing, marketing, product design, sales territories and goals and proprietary or confidential information. It is important that each director and employee avoid saying anything to a representative of any competitor that could be interpreted as an agreement to cooperate with that competitor in a common course of action.

As a vigorous competitor in the marketplace, we seek economic knowledge about our competitors. However, we will not engage in illegal or improper acts to acquire a competitor's pricing lists, marketing plans, client lists, employee lists, financial data, information about company facilities, expansion plans or operations. In addition, we do not hire competitors' employees for purposes of obtaining confidential information or urge competitive personnel or clients to disclose confidential information.

2.6 Political Activities and Contributions

The Company encourages each of its employees to be good citizens and to fully participate in the political process. Employees should, however, be aware that: (1) federal law prohibits the Wintrust Banks from contributing corporate funds to federal political candidates, political parties or party officials; and (2) employees who participate in partisan political activities must make every effort to ensure that they do not leave the impression that they speak or act for the Company. Directors, officers and employees of the Company may not use Company resources or the Company's name when making contributions to, or involving themselves in, such activities without first obtaining approval. The Company will not compensate employees for time dedicated to political activities.

You may make legitimate campaign contributions, in your personal capacity as an individual, to candidates for public office in the United States, provided such contributions comply with all other applicable Company policies, as well as any policies or regulations that may specifically apply to your individual business line or function (such as businesses registered with U.S. securities regulators). As with gifts and entertainment, political contributions must not be made: (a) with the intention of influencing an act or decision of a public official in their official capacity, (b) to induce such public official to do or not do an act in violation of their lawful duty, or (c) to encourage favorable treatment for the Company or to gain or retain business.

With respect to lobbying activities, there are many laws at the federal, state and local levels that govern attempts to influence public officials. Many of these laws apply to the attempt to influence government decisions as to such matters as legislation, administrative decisions and awarding business. If, in your role with the Company, you interact with public officials, you should be aware of which laws apply in any particular location or circumstances. You may contact the WTFC Chief Legal Officer for advice as to applicable restrictions based on your circumstances.

2.7 Financial Responsibility

Just as the Company's reputation rests on the prudent management of its customer's funds, so, too, are our employees expected to manage their own personal finances in an honest and fiscally responsible manner, consistent with employment in a financial institution. You are expected to conduct your personal financial affairs in a manner that avoids any opportunity for unfavorable reflection on the Company. In particular, employee privileges carry the responsibility of prudent use of the Company's products and services. The Company reserves the right to monitor all Company account activity, including but not limited to accounts held by employees, subject to applicable law, for any reason. This includes when it appears that the use of an account may violate criminal law, civil law or Company policy, or have an adverse effect on the Company or its employees.

2.8 Enforcement

Boards of Directors

The WTFC Board of Directors is responsible in its oversight role to assure that the business practices of the Company are conducted in accordance with the Code. In fulfilling this responsibility, the WTFC Board of Directors may require the board of directors of each subsidiary of the Company to report to the Nominating and Corporate Governance Committee of the WTFC Board of Directors regarding their oversight of the subsidiary's compliance with the Code.

In all cases, the respective boards of directors will assure that the legal rights of individuals are protected, that the Company's legal obligations are fulfilled and that proper disciplinary and legal action is taken if violations occur. The boards of directors of the Company will also see that corrective measures are taken consistently and safeguards are instituted to prevent recurrence of violations.

Reporting of Violations

As a Company employee, you are expected to report, without delay, all suspicious, unethical, dishonest or illegal activities or financial improprieties by other employees to your manager (unless implicated in the suspect activity) or through the Confidential Hotline as described below. With regard to financial affairs, a bank must make a criminal referral in the case of any known or suspected theft, embezzlement, check/debit card titling, misapplication or other defalcation involving bank funds or bank personnel in any amount. Employees are also encouraged to contact directly any of the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Chief Legal Officer, Controller or Chief Audit Executive of the Company with any concerns about wrongdoing or questionable practices of any kind within the Company.

Confidential Hotline

You may also report any such information confidentially by calling our ethics hotline at 1-866- ETHICSP (1866-384-4277) or through the hotline website at www.ethicspoint.com. The ethics hotline is maintained by a third party service to ensure confidentiality and proper handling of any reported violations and is available 24 hours a day, 7 days a week. Your report may be made anonymously through the hotline.

However, it is helpful to provide information that can be promptly investigated by appropriate officers of the Company and where appropriate, the Audit Committee of the WTFC Board of Directors or other members of the Board of Directors.

Concerns regarding questionable accounting, internal accounting controls or auditing matters, or any other suspected wrongdoing, will be promptly reported to the Chair of the Audit Committee of the WTFC Board of Directors. Upon request through the hotline, the Chair of the Audit Committee will contact you directly to discuss your concerns.

Failure to Report

Failure to submit information regarding suspected Code violations is itself a violation of the Code, as is the submission of facts which are known to be false. Submission of suspected Code violations may be made to any of the above-mentioned persons, preferably in a signed writing containing a description of the factual basis for the allegations (e.g., documents, events, meetings).

No Retaliation

It is a serious Code violation, and a violation of law, for any director, officer, employee or manager to initiate or encourage reprisal action against an employee or other person who in good faith reports known or suspected Code violations. Retaliation will not be tolerated. Making a report in "good faith" means that you have provided all the information you have and that you reasonably believe there has been a possible violation of applicable law, regulation, rule or standard, this Code or any other Company policy, even if your report turns out to be unsubstantiated. Retaliation includes any unfavorable job action (such as termination, demotion, suspension, discipline, reduced hours, transfer or adverse compensation action), threat, harassment or other discrimination in the terms and conditions of employment.

Officers and Managers

All officers and managers are responsible for advocating full compliance by all personnel and reporting any actual or alleged Code violations and any potential wrong-doing or financial improprieties. New employees shall read and sign the Code upon employment.

Request for Waivers and Changes in Code of Ethics

Waivers to the Code, if any, for directors or executive officers of the Company may only be granted by the WTFC Board of Directors. The WTFC Board of Directors shall have the sole discretion to grant any waiver request from a director or executive officer. Any waiver of Code provisions and the reasons for such waiver for a director or executive officer of the Company shall be promptly disclosed as required by SEC rules and regulations and the listing rules of the Nasdaq Stock Market.

Waivers to the Code, if any, for employees other than executive officers may be submitted to the Chief Legal Officer for consideration. The Chief Legal Officer shall formulate a recommendation on the waiver and present the waiver request and the recommendation to the Nominating and Corporate Governance Committee for its determination. The decision to grant a waiver request for employees other than

executive officers shall be at the sole discretion of the Nominating and Corporate Governance Committee. Waivers for directors and executive officers are subject to the approval of the full WTFC Board of Directors.

Any amendments to, or waiver from this Code, with respect to directors and executive officers, to the Code shall be promptly disclosed to the Company's shareholders through a posting on the Company's website.

Penalties

Violations of the Code are a serious matter and will be the basis for disciplinary action, including reprimand, loss of compensation, seniority or promotional opportunities, demotion or dismissal. Suspected and reported violations will be investigated and any violation will be dealt with fairly. All directors and employees have an obligation to cooperate and comply with any review or investigation of suspected violations of the Code.

Protected Rights

For the avoidance of doubt, nothing in this Code shall prohibit any employee from confidentially or otherwise communicating or filing a charge or complaint with a federal, state, local or other governmental agency or regulatory (including self-regulatory) entity, including concerning alleged or suspected criminal conduct or unlawful employment practices; participating in a governmental agency or regulatory entity investigation or proceeding; giving truthful testimony, statements or disclosures to a governmental agency or regulatory entity, or if properly subpoenaed or otherwise required to do so under applicable law (including any regulation or legal process); requesting or receiving confidential legal advice (at the employee's own expense); or making other statements or disclosures believed in good faith to be truthful factual information relating to unlawful employment practices. In addition, this Code does not limit an employee's right to receive an award (if any) under applicable law for information provided to any government agency or regulatory entity (including under any federal whistleblower program). Nothing in this Code prohibits, limits, or restricts, or is intended to prohibit, limit, or restrict, any employee from engaging in protected concerted activity under the National Labor Relations Act ("NLRA") for the purpose of collective bargaining or other mutual aid or protection, including, without limitation, (i) making disclosures concerning this Code in aid of such concerted activities, (ii) filing unfair labor practice charges, (iii) assisting others who are filing such charges, (iv) cooperating with the investigative process of the National Labor Relations Board and other government agencies, and (v) discussing terms and conditions of employment. This Code will not be interpreted or applied in any way to restrain or coerce employees in the exercise of rights under Section 7 of the NLRA. Nothing in this Code is intended to interfere with any employee rights that are provided or protected by law.

3.0 Responsibilities

3.1 Committee Responsibilities

WTFC Board of Directors

The WTFC Board of Directors is responsible for the following:

- Review and approve this Code at least annually and consider for approval any revisions submitted by the WC-NCG.

WTFC Nominating and Corporate Governance Committee

The WC-NCG is responsible for the following:

- Review, at least annually, this Code and make any recommendations considered appropriate relating to modifications or enhancements of this Code to the WTFC Board of Directors.
- Consider waivers, if any, to this Code, subject to approval of the full WTFC Board of Directors with respect to waivers for directors and executive officers.

Audit Committee of the WTFC Board of Directors

The WC-AC is responsible for the following:

- Review and recommend approval of this Code at least annually and consider for approval any revisions submitted by the Ethics Committee.
- Periodically review reports regarding violations of this Code to determine adherence to this Code.
- Review internal audit or regulatory findings related to this Code.

WTFC Ethics Committee

The Ethics Committee is responsible for the following:

- Review and recommend approval of this Code at least annually and consider for approval any revisions submitted by the WC-ERMC or any management committee.
- Receive and review information, at least quarterly on the status of compliance with this Code.
- Review internal audit or regulatory findings related to this Code.
- Report to the WC-AC periodically regarding the above.

WTFC Enterprise Risk Management Committee

The WC-ERMC is responsible for the following:

- Review and recommend approval of this Code at least annually and consider for approval any revisions submitted by the WTFC Chief Legal Officer or other risk committee.

- Receive and review information, at least quarterly on the status of compliance with this Code.

- Review internal audit or regulatory findings related to this

Code. **3.2 Other Responsibilities**

Code Owner (WTFC Chief Legal Officer)

The Code Owner is responsible for the following:

- The Code Owner is responsible for keeping this Code current and comprehensive, accounting for changes to Company practices, new or changing laws and regulations, and establishing appropriate controls to ensure adherence to the Code. The Code Owner may delegate the authority, but not the responsibility, for performing the required administrative tasks associated with the Code.

Training and Communication Plan

4.0 Policies and Procedures

This Code will be posted to the Corporate Risk Management Wintranet Site, made available on the Company's website, and distributed to key executives of applicable business units.