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Wintrust Financial Corporation

Policy of the Board of Directors Regarding Excessive or Luxury Expenditures

WINTRUST

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Policy of the Board of Directors Regarding Excessive or Luxury Expenditures

Policy

Wintrust Financial Corporation (the "Company") hereby prohibits excessive or luxury expenditures of Company or subsidiary funds relating to (i) entertainment and events, (ii) office or facility renovations, (iii) aviation or other transportation services or (iv) other similar items, activities or events if such expenditures are not reasonable expenditures for staff development, reasonable performance incentives or other similar measures conducted in the normal course of the business operations of the Company.

The Board shall review this policy periodically and may amend it from time to time.

Standards Regarding Specific Expenditures

Entertainment or Events

While the employees, officers and directors of the Company are encouraged, at all times, to grow the Company's business and promote good relations with the Company's customers, business development expenses which are not usual and customary, in the light of the relationship between the Company and a particular customer or business partner, shall require the approval of the Board of Directors (the "Board") or a Specified Officer (as defined below). All expenditures for which reimbursement is sought shall be properly documented by the Company and the party seeking reimbursement.

Conferences

We encourage our staff to attend educational or other conferences with a business purpose that present appropriate opportunities. These conferences should be related to the financial services industry and have a direct relationship to the job of the attending employee.

Office or Facility Renovations

Renovations of the Company's facilities and office spaces shall be consistent with the broader capital expenditure policy of the Company. The Board has determined that the Company's expenditures upon office and facility renovations, to date, have been reasonable. Accordingly, future expenditures upon office and facility renovations will require the approval of the Board or a Specified Officer only if such expenditures depart from the magnitude or frequency of the Company's prior expenditures.

Aviation or Other Transportation Services

Travel by Company staff to outlying locations, including bank locations, conferences and the offices of our business partners should be conducted in the most appropriate way for the Company. The accounting department shall create, when appropriate, an analysis of trips to determine which mode of transportation is the most appropriate for the Company and its shareholders. The analysis shall consider alternative modes of transportation, including automobiles, commercial air service and private air service. The analysis shall consider factors including cost, efficiency and timeliness of travel.

In addition, the chartering of a private jet by the Company shall require the approval of the Executive Committee of the Board (provided that the Chief Executive Officer shall not participate in the approval of any charter for his or her own travel).

Other Similar Items, Activities or Events

Holiday Parties

Holiday parties are an important way for the Company to show its appreciation for its employees. Holiday parties shall follow the procedures for approval as set forth below.

Retreats of the Board

Retreats of the Board should be primarily for educational purposes and be aimed at improving the performance of the Board. Board education is a vital part of the maintenance of a diverse and dynamic director base and this policy should not limit Board activities aimed at promoting the Company's strategic or business planning.

Procedures for Approval

Expenditures which would be inconsistent with this policy must be approved, in advance, by the Board or by the Chief Executive Officer, Chief Operating Officer or Chief Financial Officer (each a "Specified Officer") of the Company. However, a Specified Officer may not pre-approve his or her own request; such request must be approved by another Specified Officer or by the Board, in case of the Chief Executive Officer.

Reporting

Violations of this policy shall be reported promptly to a Specified Officer or the Board. Violations may also be reported via the Company's ethics hotline through EthicsPoint, a third-party ethics hotline provider. The hotline can be accessed 24 hours a day, 7 days a week by telephone at 1-866-ETHICSP (1-866-384-4277) or through the hotline website at www.ethicspoint.com.

Any Specified Officer who is notified of such a violation shall, in turn, bring the matter to the attention of the Board at a date no later than its next scheduled meeting. All reports will be dealt with anonymously and confidentially.

Accountability

All agents, employees, officers and directors of the Company shall adhere to this policy. Upon any violation of this policy, the Board shall consider, in its discretion, what consequence is appropriate to remedy the violation and prevent future violations of this policy.