

**POLICY:** **CODE OF ETHICS POLICY**  
**ADOPTED:** **June 22, 2006**  
**LAST ACTION:** **September 26, 2024 - Reaffirmed**  
**CURRENT ACTION:** **September 11, 2025 - Reaffirmed**

## Introduction

Magyar Bank's (the "Bank") commitment to the highest ethical standards is essential to our efforts to uphold our reputation of integrity with our customers, our shareholders, our fellow employees, and our community. It is fundamental that those who use the services of the Bank be able to do so with complete confidence in the integrity of those with whom they deal. This Code of Ethics (the "Code") does not cover every issue that may arise, but it sets out basic principles to guide all directors, officers and employees of the Bank-- each of whom must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. Every director, officer and employee of the Bank must read, understand and adhere to this Code.

If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with this Code. In several instances, the Bank will have more detailed policies regarding the topics covered in this Code (for example, the Bank's Information Technology Policy). You are expected to comply with both the general requirements discussed in this Code and the more detailed policy in any operating rules and procedures set forth in the applicable policies or department or branch manuals. If you have any questions regarding compliance with any policy or conflicts between any policies, you should consult the Compliance Officer for advice.

The Bank is taking its commitment to ethical business practices seriously and as a result those who violate the standards in this Code will be subject to disciplinary action up to and including termination.

Reporting of any incident may be done in person, on the telephone or through a written statement. Reports may also be made confidentially using one of the following methods:

- via telephone to a confidential, third party Hotline at 1-855-252-7606
- via website: <http://hotline-services.com>

## Our Basic Ethical Principles

### Honesty

Our business is based on mutual trust and absolute honesty in all our affairs, both internally and externally. This philosophy must be respected at all times and throughout both our personal and corporate behavior.

### Integrity

The nature of our business provides opportunities that can be developed through integrity in our personal and professional business practices. We must treat all our resources, including our name,

with the respect befitting a valuable asset. We should never use them in ways that could be interpreted as imprudent, improper or for personal gain.

### **Respect**

We must treat one another with respect and dignity and appreciate the diversity of our workforce, our customers and our communities.

### **Good Citizenship**

We must comply with the spirit and intent of the laws that govern our business and contribute to the strength and well-being of our communities.

### **Compliance With Laws, Rules And Regulations**

The Bank's ethical standards are built first and foremost on obeying the law, both in letter and in spirit. All of our activities must always be in full compliance with all laws and regulations of the jurisdictions in which the Bank does business and the Bank's various policies and manuals. All directors, officers and employees of the Bank shall carry out their responsibilities in accordance with all applicable laws, regulations and policy statements, including all applicable federal and state criminal laws governing fraud, bribery, embezzlement, conversion and conflicts of interest. Directors, officers and employees must conduct their business affairs in a manner consistent with applicable safety and soundness standards and the requirements of this Code. Everyone is expected to have sufficient knowledge of applicable law and regulation as it relates to their duties and to know when to get advice from higher authority. The best safeguard is to follow the operating rules and procedures laid down in the department or branch manuals applicable to you, which have been prepared with legal requirements in mind.

### **Accurate Record Keeping and Accounting**

The Bank requires honest and accurate recording and reporting of financial and other information in order to make responsible business decisions and provide an accurate account of the Bank's performance. It is a violation of law and the Bank's policy for any director, officer or employee to attempt to improperly influence or mislead any accountant engaged in preparing our audit. The Bank is committed to full compliance with all requirements applicable to its regulatory disclosures. The Bank requires that its financial and other reporting fairly present the financial condition, results of operations and cash flow of our Bank and that it complies in all material respects with applicable law and governmental rules and regulations, including generally accepted accounting principles and internal accounting controls.

### **Money Laundering; Antiterrorism Laws**

The Bank complies fully with federal, state and international laws prohibiting money laundering and with the safeguards against terrorist activity contained in the USA Patriot Act.

Under no circumstances should any director, officer or employee of the Bank participate in any money laundering activity. In addition to severe criminal penalties, money laundering or violations of the USA Patriot Act committed by directors, officers or employees will result in disciplinary action, including termination. Any suspicious deposits or any other customer activity that raises questions about the source of the customer's funds should be reported immediately to your manager or the BSA Officer. (Also see the Bank's Bank Secrecy Act Policy.)

### **Improper and Corrupt Payments: FCPA Violations**

The local laws in most countries outside the United States and the U.S. Foreign Corrupt Practices Act ("FCPA") prohibit providing money or anything else of value to government officials, political parties or candidates for public office for the purpose of improperly influencing their actions in order to obtain or retain business. The FCPA applies to all directors, officers and employees of the Bank, regardless of citizenship or residency. The Bank is committed to full compliance with the FCPA and other anti-corruption or anti-bribery laws. If you suspect that any activity you are involved in may violate the FCPA or other anti-corruption laws, or if you become aware of such activity by any employee, officer or director of the Bank, you must notify the Compliance Officer immediately.

### **Political Contributions by The Bank**

Distinct rules govern political contributions made by the Bank. Generally, it is against the Bank's policy and, in many instances, it is illegal to make corporate contributions to political parties or candidates for public office in any country. However, certain exceptions apply and, therefore, guidance should be sought from the Compliance Officer and legal counsel before any political contributions are made on behalf of the Bank.

### **Document Retention and Destruction**

All directors, officers and employees must fully comply with the Bank's document retention and destruction policy. Once a legal proceeding has begun, or even when one is threatened or reasonably likely, federal and state obstruction-of-justice statutes require the Bank to preserve documents relevant to the issues in that proceeding even before specific documents are requested.

Any director, officer or employee, who fails to comply with this policy, as well as industry regulations and state and federal laws, is subject to termination and may also face criminal or civil prosecution, with possible fines and prison terms.

### **Regulatory Agencies, Auditors And Counsel**

Honesty and cooperation is required in dealing with the Bank's independent and internal auditors, investigators and attorneys. Requests by regulatory or governmental agencies for information, other than that incidental to required reports, should be referred to the Compliance Officer.

### **Competition and Fair Dealing**

We must compete fairly and honestly with a competitive advantage through superior service and performance, never through unethical or illegal business practices. Good customer relationships are based on integrity and trust. It is against the Bank's policy to engage in unethical or illegal activity to win or keep business relationships. Each director, officer and employee must endeavor to deal fairly with the Bank's customers, suppliers, competitors and other employees. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

### **Anti-Competitive Activities**

Federal law prohibits any combination, conspiracy or agreement among competitors to restrict or prevent competition. A violation of the law can occur through a formal or informal agreement between the Bank and a competitor to fix prices, allocate markets or customers, or refuse to deal with particular suppliers or customers.

All individuals of the Bank should especially be careful at social or professional meetings. Discussions or exchanges of confidential information relating to competitive matters (i.e., cost, pricing, or strategy) must carefully be avoided.

Employees with questions concerning anti-trust issues should be directed to the Compliance Officer.

### **Purchasing of Supplies**

When procuring supplies, it is important to always be objective and fair whenever you are involved with our suppliers. Always employ professional business practices in selecting sources, in negotiations, in awarding business and in the administration of purchasing activities. It is wrong to create even the impression that a supplier has a "friend" at the Bank exerting special influence. The best approach is to be friendly, but strictly business-oriented.

All business is to be conducted fairly, impartially and honestly.

### **Protection And Proper Use Of Bank Assets**

Directors, officers and employees of the Bank must protect the Bank's assets and ensure they are used only for proper purposes. The Bank's assets may only be used for legitimate business purposes. The Bank's assets include its capital, facilities, equipment, proprietary information, technology, business plans, ideas for new products and services, trade secrets, inventions, and customer information. Every director, officer and employee has a role in protecting the value and integrity of the Bank's property.

### **Bank Funds**

Directors, officers and employees entrusted with Bank funds are personally accountable for the handling of those funds.

### **Physical Assets**

Officers and employees are entrusted with a number of the Bank's physical assets, such as computer equipment, telephones and office supplies. These assets should be used only to conduct the Bank's business or for other purposes authorized by management, and must be protected from loss, damage, misuse or theft.

### **Information Technology**

The Bank's information systems, such as Internet access, e-mail and software programs, are vital to the Bank's business. Officers and employees should use them only for business purposes. Using the Internet for non-business purposes is an inappropriate and prohibited use of the Bank's assets.

All information stored in the computer system, such as data files or word processing documents, is to be treated as Bank information of a proprietary nature to the Bank. (Also see the Bank's Information Technology Policy, Privacy & Security Policy and Guidelines and Information Technology Acceptable Use Policy.)

### **Conflicts Of Interest**

Directors, officers and employees of the Bank must make all business decisions on behalf of the Bank free from conflicting outside interests. It is a violation of this Code and of the Bank's policies for any person to advance their own personal or business interests (or those of others with whom such persons have a personal or business relationship) at the expense of the Bank.

Directors, officers and employees of the Bank have a fundamental duty to avoid conflicts of interest or potential conflicts of interest. Every position in the Bank involves a degree of trust and responsibility which would be compromised if a director, officer or employee were to solicit or receive personal advantage by reason of his or her position in the Bank or by reason of the Bank's relationship with a client, customer or supplier.

Some examples of conflicts of interest include when a director, officer or employee receives money or other benefits from a third party in return for the Bank granting a loan to or purchasing property from such third party or when a director, officer or employee advocates a transaction between the Bank and a Bank in which such person owns stock or otherwise stands to benefit from the transaction at the expense of the Bank. Although it is impossible to cover every potential conflict of interest situation, a potential conflict exists whenever a director, officer or employee of the Bank has an outside interest - direct or indirect - which conflicts with his or her duty to the Bank or adversely affects his or her judgment in the discharge of responsibilities to the Bank. The appearance of a conflict of interest may be just as damaging to the Bank's reputation as a real conflict of interest and is just as difficult for the individuals involved to discern. Bank directors, officers and employees are expected to take an objective look at their actions from time to time and inquire whether or not a reasonable, disinterested observer - a customer, a supplier, a shareholder, an acquaintance, or a government official - would have any

grounds to believe a conflict of interest exists.

### **Giving and Receiving Gifts**

Directors, officers and employees and their immediate families should never accept any gift that might make it appear that their business judgment could be compromised. In turn, directors, officers and employees should never provide a gift to a customer or prospect that might appear to be an attempt to influence them. Gifts may include material goods, service, promotional premiums, and discounts. When the value of the gift is appropriate to the occasion (e.g., holidays), gifts may be accepted by or provided to customers and prospects, but it is always inappropriate to seek or accept cash payments or personal loans of money. Gifts or gratuities to government officials are strictly prohibited. Always be sensitive to potential unlawful activities, such as kickbacks or bribes (payment for giving business to, or getting business from, an organization). Such activities are always unethical and often illegal in the U.S. and around the world. If you have any doubts about giving or receiving a gift, consult the Compliance Officer.

### **Estate Matters**

No employee or member of an employee's family (with certain limited exceptions) may accept any benefit under a will or trust instrument of Magyar Bank with a value greater than \$1,000 unless the customer is a member of the employee's family or senior management has approved, after consultation with legal counsel. An employee may never demand, request or solicit any benefit under a will or trust instrument of a customer of Magyar Bank.

No employee or member of an employee's family may act in any fiduciary capacity under a will trust, or other instrument of a customer of Magyar Bank unless prior senior management approval has been obtained after consultation with legal counsel and the employee turns over to Magyar Bank any commission or fees received. This does not apply to a will, trust or other instrument established by a member of the employee's family.

In all estate or trust matters involving employees where Magyar Bank is a fiduciary, senior management of Magyar Bank must be consulted in advance in order to ensure compliance with applicable laws and regulations.

### **Personal Finance Practices**

Employees should borrow only from financial institutions that regularly lend money. Loans to employees, officers and directors are underwritten in accordance with Magyar Bank's loan underwriting standards. Loans are offered to employees, officers and directors at terms and conditions the same as those offered to the general public, with the exception of eligibility for a rate discount. Employees are not permitted to borrow from customers or vendors of Magyar Bank.

### **Business Entertaining**

It is common business development practice to take customers, prospects and other associates to meals, or cultural and sporting events. Good judgment is required, however. Sometimes the entertainment goes beyond its original intent, which is to establish relationships that enhance our ability to work together. Lavish or frequent entertaining could appear to influence the judgment of the person being entertained. If you receive an invitation that seems inappropriate, discuss it with the Compliance Officer.

### **Relationships with Outside Interests**

Directors, officers and employees must disclose to the Compliance Officer any financial interest they may have in any entity or transaction in which the Bank has an interest or is involved. From time to time, it may be in the Bank's best interest to have a director, officer or employee serve as a director or have some other relationship with a customer, insured entity or other supplier. This type of relationship should always be disclosed to the Compliance Officer prior to its commencement, and it will be considered on its individual merits. Charitable and nonprofit organizations are exceptions to this general disclosure policy. Directors, officers and employees may also own securities in publicly traded companies or municipal entities who are competitors or customers, when such an interest is not material in terms of the total outstanding stock, or to the employee's net worth. Such relationships are prohibited only when they appear to influence the way we do business, or if they appear to be a conflict of interest or illegal.

### **Secondary Employment**

The Bank does not prohibit outside employment; however, full-time employees are expected to devote their complete attention and energy to their career with the Bank. Significant outside employment or employment in positions or establishments which may result in adverse public reaction must be avoided. Bank policy requires that officers must obtain the approval of the Bank's Human Resources Department, and staff employees must notify their immediate supervisor prior to accepting any outside employment. All officers holding the title of Senior Vice President or higher ("Executive Officer") must notify the Board of Directors prior to accepting any outside employment.

Officers and employees must avoid outside employment that involves or may appear to involve a conflict of interest. Examples include:

- Employment by a Bank, or personally engaging in any activity, that is competitive with the Bank.
- Employment which involves the use of the Bank's equipment, supplies or facilities.
- Employment which involves the preparation, audit or certification of statements, tax returns, or other documents upon which the Bank may place reliance for lending or other purposes.
- Officers and employees who prepare income tax returns for individuals or entities other than themselves must obtain confirmation from their potential customer that the customer does

not intend to use the officer's or employee's work product as part of any transaction with the Bank.

- Employment which involves the rendering of investment, legal or other advice, or exercising judgment which is based upon information, reports or analyses that are accessible primarily from or through the individual's employment with the Bank.
- Employment which may reflect adversely on the officer or employee or the Bank.
- Employment under circumstances which may suggest the sponsorship or support of the Bank on behalf of the outside employer or an outside organization.
- Employment as an insurance or securities broker, agent or representative.
- Employment as a real estate salesman, broker, agent or contractor, except with the prior written approval of the officer's or employee's immediate supervisor with the concurrence of the Compliance Officer.

### **Confidentiality And Privacy**

Directors, officers and employees are required to maintain the confidentiality of information entrusted to them by the Bank and provided by our customers and vendors. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Bank or its customers, if disclosed. It also includes non-public information about the Bank's financial condition, results of operations, business operations and future prospects. All employees must exercise care not to misuse nonpublic information obtained during their employment, including customer lists, information about the Bank's personnel and customers, and business plans and ideas. The obligation to preserve confidential information continues even after employment ends.

The obligation to maintain the confidentiality of information may be subject to legal or regulatory requirements to disclose that information. If you have any questions regarding what constitutes confidential information or when such information must be disclosed, discuss your concerns with the Compliance Officer. (Also see the Bank's Information Security Policy and the Policies and Procedures Regarding the Confidentiality of Information.)

### **Code Administration And Enforcement And Whistleblower Protection**

#### **Administration Responsibility**

The Human Resources Director is responsible for administering and enforcing this Code for officers and employees, conducting Code-related training, maintaining all Code-related records and investigating and resolving all Code-related matters. The Audit Committee is responsible for enforcing this Code for Executive Officers and directors. Code-related matters are any questions regarding the scope of this Code or compliance herewith including any violations or alleged violations of any provision of this Code.

#### **Responsibility to Report Code-Related Matters**

All persons subject to this Code must report Code-related matters in accordance with the procedures set forth herein. All officers and employees must promptly make reports of any Code-related matters to their supervisor or the Human Resources Director. All supervisors receiving such reports must promptly advise the Human Resources Director, even if such supervisor has reason to believe that the Human Resources Director has already been advised. The Human Resources Director will make periodic reports to the Audit Committee regarding complaints received. Directors shall promptly make reports of any Code-related matters to the Chief Executive Officer, the General Counsel or the Chairman of the Audit Committee.

### **ACKNOWLEDGMENT**

Every new employee and addition to the Board of Directors will be initially be required to sign an acknowledgement that he or she has read the Code of Ethics and agrees to its provisions. Any changes made during the year will be communicated to employees and Board of Directors and an acknowledgement signed. The Human Resources Director is responsible to obtain and retain the acknowledgements from all employees of the Bank. The Executive Assistant will obtain and retain the signed acknowledgements from the Board of Directors, President/CEO and CFO.

Please detach, sign and return the following page to Human Resources.

### **THIS POLICY IS NOT A CONTRACT**

Magyar Bank expressly reserves the right to interpret, apply, amend, revoke, follow, modify, augment or delete the policies, practices, procedures and statements contained herein at anytime without notice.

### **Code Of Ethics Policy Acknowledgement**

I acknowledge that I have received a copy of Magyar Bank's Code of Ethics.

I also acknowledge that I understand and agree that it is my responsibility to read and familiarize myself with this policy. I also agree to comply with the terms of the policy. I understand and agree that the Code of Ethics is not an employment contract between the Bank and me.

I understand that if I have questions related to the standards of conduct in the Code, I am to discuss them promptly with my supervisor, the Human Resources Director or the Compliance Officer or, in the case of Executive Officers and directors, the President or the Chairman of the Audit Committee.

**Employee Name (Please Print):** \_\_\_\_\_

**Employee Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Assigned Department/Branch (if applicable):** Executive