

# Code of Business Conduct and Ethics

All Policies and (required) Programs will be reviewed and approved each calendar year by the Board of Directors (“Board”) or an appropriate committee of the Board (“Committee”), even if there are no changes. Changes to existing and/or new Policies will also be reviewed and approved as described above and may occur at any time during the calendar year.

<b>Functional Division:</b>	<b>Legal/Governance</b>
<b>Corporate Executive Sponsor(s):</b>	<b>Chief Legal Officer/Chief Gov Officer</b>
<b>Senior-Level Responsibility:</b>	<b>n/a</b>
<b>Date Board Amended:</b>	<b>Effective 07/23/2024</b>
<b>Date Board Reviewed and Approved:</b>	<b>04/17/2025</b>
<b>Date Committee Reviewed and Approved:</b>	<b>04/15/2025</b>
<b>Policy Name:</b>	<b>Code of Business Conduct and Ethics</b>
<b>Policy Number:</b>	<b>GOV.100</b>

## AMERIS BANCORP

### CODE OF BUSINESS CONDUCT AND ETHICS

The Board of Directors of Ameris Bancorp (together with Ameris Bank and its other subsidiaries, the “Company”) has adopted this Code of Business Conduct and Ethics (the “Code”) in order to:

- (a) promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- (b) promote full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in other public communications made by the Company;
- (c) promote compliance with applicable governmental laws, rules and regulations;
- (d) promote the protection of Company assets, including corporate opportunities and confidential information;
- (e) promote fair dealing practices;
- (f) deter wrongdoing; and
- (g) ensure accountability for adherence to the Code.

All employees, officers and directors of the Company, and all suppliers, to the extent applicable, are required to be familiar with this Code, comply with its provisions and report any suspected violations as described below.

Anyone who violates this Code will be subject to appropriate disciplinary action, which may include termination of employment or other service to the Company.

If you are in a situation which you believe may violate or lead to a violation of this Code, follow the guidelines described in Sections 15, 16 and 17 of this Code.

#### **1. Honest and Ethical Conduct**

The Company’s policy is to promote high standards of integrity by conducting its affairs honestly and ethically.

Each employee, officer and director must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company’s customers, suppliers, partners, service providers, employees and anyone else with whom he or she has contact in the course of performing his or her work for the Company.

#### **2. Compliance with Laws, Rules and Regulations**

Obedying the law, both in letter and in spirit, is the foundation on which the Company’s ethical standards are built. All employees, officers and directors must respect and obey the laws of the cities, states and country in which the Company operates, including, for example, those relating to insider trading.

Although not all employees, officers and directors are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

If a law conflicts with a policy in this Code, you must comply with the law. If you have any questions about these conflicts, you should ask your supervisor, manager or other appropriate personnel how to handle the situation.

### **3. Conflicts of Interest**

A conflict of interest occurs when an individual's private interest (or the interest of a member of his or her family) interferes, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when an employee, officer or director (or a member of his or her family) takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts of interest also arise when an employee, officer or director (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company.

Loans to, or guarantees of obligations of, an employee, officer or director (or a member of his or her family) may create conflicts of interest. To avoid the potential for conflicts of interest, the Company has guidelines with respect to extensions of credit to its employees, officers and directors, as detailed in its Loan Policy. In addition, any loan to an executive officer, director or principal shareholder (or related interest) must comply with applicable laws and regulations, including Regulation O of the Federal Reserve Board. Loans to insiders must be on substantially the same terms as with any other bank customer of comparable credit risk. In this respect, loans cannot contain favorable interest rates and must not involve more than the normal risk of repayment. Specific limitations on loans to insiders are provided in the Company's Regulation O Policy, which addresses documentation requirements, disclosure of related interests, prior approval criteria, special limitations on loans to executive officers, aggregate lending limits and director abstention from voting.

It is almost always a conflict of interest for a Company employee to work simultaneously for a competitor, customer, or supplier. You are not allowed to work for a competitor in any way, including, but not limited to, as an employee, consultant or board member. The best policy is to avoid any direct or indirect business connection with the Company's customers, suppliers or competitors, except on the Company's behalf.

Conflicts of interest are prohibited as a matter of Company policy. Conflicts of interest may not always be straightforward, so if you have a question, you should consult with higher levels of management or the Company's Legal department. Any employee, officer or director who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in Sections 15, 16 and 17 of this Code.

Circumstances that might give rise to a conflict of interest may also be subject to the Company's Related Party Transactions Policy, which includes additional considerations for certain transactions involving executive officers or directors, or their family members, among others.

#### **4. Disclosure.**

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each employee, officer and director who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each employee, officer and director must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

Each employee, officer and director who is involved in the Company's disclosure process must:

- (a) be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and
- (b) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

#### **5. Insider Trading**

Employees, officers and directors who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of the Company's business. All non-public information about the Company, or its customers, business partners or suppliers, should be considered confidential information.

In addition, no employee, officer or director may purchase or sell any Company securities while in possession of material nonpublic information regarding the Company, nor may any employee, officer or director purchase or sell another company's securities while in possession of material nonpublic information regarding that company.

To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. The Company has adopted the Insider Trading Policy to specifically govern trading in securities of the Company by employees, officers and directors. That policy should be reviewed by each employee, officer and director. If you have any questions, please contact the Company's Chief Legal Officer to discuss them.

#### **6. Corporate Opportunities**

All employees, officers and directors owe a duty to the Company to advance its interests when the opportunity arises. Employees, officers and directors are prohibited from taking for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of Company assets, property, information or position. Employees, officers and directors may not use Company assets, property, information or position for personal gain (including gain of friends or family members). In addition, no employee, officer or director may compete with the Company.

## **7. Competition and Fair Dealing**

The Company seeks to outperform its competition fairly and honestly. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee, officer and director should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. No employee, officer or director may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

## **8. Entertainment and Gifts; Acceptance of Something of Value**

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. In general, no gift or entertainment should ever be offered, given, provided or accepted by any Company employee, officer or director, or by any family member of any employee, officer or director, unless it: (i) is not a cash gift; (ii) is consistent with customary business practices; (iii) is not excessive in value; (iv) cannot be construed as a bribe or payoff; and (v) does not violate any laws or regulations, including the federal bank bribery law.

Additional information regarding the acceptance of things of value is set forth in the Company's Employee Handbook. Please discuss with your supervisor, manager or appropriate personnel any gifts or proposed gifts which you are not certain are appropriate and in compliance with the Employee Handbook.

## **9. Discrimination and Harassment**

The diversity of the Company's employees is a tremendous asset. The Company is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples include, but are not limited to, derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. For additional information, consult the Company's employee handbook and the Company's Diversity, Equity and Inclusion Policy.

## **10. Recordkeeping**

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. All of the Company's books, records, accounts and financial statements must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls.

Records should always be retained or destroyed according to the Company's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the Company's Legal department.

## **11. Confidentiality**

Employees, officers and directors must maintain the confidentiality of confidential information entrusted to them by the Company or its customers, suppliers or partners, except when disclosure is authorized by appropriate personnel, or the Board of Directors, or required by laws or regulations. Confidential information includes all non-public information that might be of use to competitors, or harmful to the

Company or its customers, suppliers or partners, if disclosed. The obligation to preserve confidential information continues even after employment or service as a director ends.

## **12. Protection and Proper Use of Company Assets**

All employees, officers and directors should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company assets should be dedicated to legitimate Company business, though incidental personal use of Company equipment may be permitted. Questions regarding personal use should be directed to your supervisor or manager.

The obligation of employees, officers and directors to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties.

## **13. Payments to Government Personnel**

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules not only would violate Company policy but also could be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. Questions regarding these issues should be directed to the Company's Legal department.

## **14. Special Considerations for Chief Executive and Senior Financial Officers**

In addition to the other provisions of this Code, Specified Officers are also subject to the specific policies set forth in this Section 14. "Specified Officers" shall include the Company's principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions, including the Company's Chief Executive Officer, Chief Financial Officer and Executive Vice President – Corporate Controller. In the event of the change of an officer's title or designation as a principal officer, or the addition of an officer to the foregoing definition, any officer performing a similar function shall be included.

- (a) The Specified Officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company with the SEC. Accordingly, it is the responsibility of each Specified Officer promptly to bring to the attention of the Board of Directors any material information of which he or she may become aware that affects the disclosures made by the Company in its public filings or otherwise assist the Board of Directors in fulfilling its responsibilities.

- (b) Each Specified Officer shall promptly bring to the attention of the Board of Directors and the Audit Committee any information he or she may have concerning (1) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (2) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.
- (c) Each Specified Officer shall promptly bring to the attention of the Board of Directors, the Company's Chief Legal Officer and the Audit Committee any information he or she may have concerning any violation of this Code, including any actual or apparent conflicts of interest between personal and professional relationships, involving any management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.
- (d) Each Specified Officer shall promptly bring to the attention of the Board of Directors, the Company's Chief Legal Officer and the Audit Committee any information he or she may have concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to the Company and the operation of its business, by the Company or any agent thereof.
- (e) The Board of Directors shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of this Code by any Specified Officer. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code, and shall include written notices to the individual involved that the Board of Directors has determined that there has been a violation and a censure by the Board of Directors, demotion or re-assignment, suspension with or without pay or benefits (as determined by the Board of Directors) or termination of the employment of the individual involved. In determining what action is appropriate in a particular case, the Board of Directors, or its designee, shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action, and whether the individual in question had committed other violations in the past.

## 15. Compliance Procedures

In some situations, it may be difficult to know if a violation of this Code has occurred. Following are the steps to keep in mind:

- (a) Make sure you have all the facts. In order to reach the right solutions, the Company must be as fully informed as possible.
- (b) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

- (c) Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the situation.
- (d) Discuss the situation with your supervisor, manager or other appropriate personnel. This is the basic guidance for all situations. In many cases, your supervisor or manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process.
- (e) Seek help from Company resources. In cases where it may not be appropriate to discuss an issue with your supervisor or manager, where your supervisor or manager is not sure of the answers to your questions, or where you do not feel comfortable approaching your supervisor or manager with your questions, you may discuss the issue locally with other appropriate personnel, such as your regional Human Resources Manager.
- (f) You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. However, in some circumstances the Company may not be able to conduct an effective investigation should you choose to remain anonymous. The Company does not permit retaliation of any kind against employees for good faith reports of suspected violations of this Code or any Company policy or legal requirement.
- (g) Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.

## 16. Employee Complaint Procedures for Accounting Matters

The Audit Committee has established the following procedures specifically for the receipt, retention and treatment of employee complaints regarding accounting, internal controls or auditing matters or concerns regarding questionable accounting or auditing matters (collectively, "Accounting Matters").

### Receipt of Employee Complaints and Concerns

- (a) Employees with complaints or concerns regarding Accounting Matters may report them to any of: (i) their immediate supervisors, managers or other appropriate personnel; (ii) the Company's external auditors; or (iii) the Company's General Auditor.
- (b) Employees may forward complaints or concerns regarding Accounting Matters on a confidential or anonymous basis by phone, email or regular mail to:

David Boggs, EVP/General Auditor  
404-639-6804  
[david.boggs@amerisbank.com](mailto:david.boggs@amerisbank.com)  
3500 Piedmont Road, Suite 500  
Atlanta, Georgia 30305

or

Robert P. Lynch, Chairman of the Audit Committee  
904-759-1629

[bob.lynch@amerisbank.com](mailto:bob.lynch@amerisbank.com)  
2165 River Boulevard  
Jacksonville, Florida 32204

- (c) Employees may also submit complaints or concerns regarding Accounting Matters on a confidential or anonymous basis online to the Company's Employee Hotline through the *Report it*® service provider. Login information for the Employee Hotline is located on the home page of *The Mane Connection*. If an employee needs reporting assistance, the hotline's service provider can be reached toll free at 1-877-RPT-LINE.

#### Treatment of Complaints

- (a) Upon receipt of a complaint, the recipient will (i) determine whether the complaint pertains to Accounting Matters and (ii) when possible, acknowledge receipt of the complaint to the sender.
- (b) Complaints relating to Accounting Matters will be reviewed under Audit Committee direction with oversight by Internal Audit or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation.
- (c) Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.

### **17. Reporting and Enforcement Procedure for Other Complaints**

The following procedures relate to all prohibited actions or violations of this Code, and the consequences thereof.

#### Reporting and Investigation of Violations

- (a) Actions prohibited by this Code involving directors or executive officers must be reported to the Audit Committee.
- (b) Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to the reporting person's supervisor or manager.
- (c) Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed illegal or unethical behavior when in doubt about the best course of action in a particular situation.
- (d) After receiving a report of an alleged prohibited action, the Audit Committee or the relevant supervisor or manager, as the case may be, must promptly take all appropriate actions necessary to investigate.
- (e) All employees, officers and directors are expected to cooperate in any internal investigation of misconduct.

## Enforcement

- (a) The Company must ensure prompt and consistent action in the case of violations of this Code.
- (b) If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board of Directors.
- (c) If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor or manager determines that a violation of this Code has occurred, the executive officer overseeing the supervisor's or manager's area will report such determination to the Board of Directors.
- (d) Upon receipt of a determination that there has been a violation of this Code, the Board of Directors will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of law, notification of appropriate governmental authorities.

### **18. Waivers of the Code of Business Conduct and Ethics**

Any waiver of this Code for executive officers or directors may be made only by the Board of Directors, in its discretion. Any waiver of this Code for any other individual may be made by the Board of Directors, a committee thereof or an executive officer of the Company with responsibility for ethics oversight, in each case in the discretion of the Board or such committee or executive officer. Any waiver shall be promptly disclosed, as and to the extent required by SEC or New York Stock Exchange rules.

### **19. Prohibition on Retaliation**

It is the policy of the Company not to allow retaliation for reports of misconduct or violations of this Code by others made in good faith by any employee, officer or director. Further, any employee, officer or director may submit a good faith complaint regarding the Company's accounting, internal controls or auditing matters or concerns regarding questionable accounting or auditing matters without fear of dismissal or retaliation of any kind.

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