Whistleblower Policy

This policy applies to all officers, employees, and directors of BOK Financial Corporation, its affiliates, divisions, and subsidiaries (collectively "BOKF").

DOCUMENT CONTROL

Approved by:
Audit Committee, BOKF Board of Directors

Date approved:
5/5/2026

Next review date:
Annually

BOK FINANCIAL

REVISION RECORD

Revision description	Approved by	Date
Initial Draft	Risk Council	July 16, 2014
Final Policy	Board Audit Committee	July 29, 2014
Updated Hotline link and telephone number	N/A	May 28, 2015
Annual approval	Board Audit Committee	July 28, 2015
Additional Review		October 1, 2015
Annual Approval – Trade Secrets; Reporting	Board Audit Committee	October 25, 2016
Annual Approval – sales practices and customer impact language added, Corp Risk Governance made primary owner, defined expectation of anonymity	Board Audit Committee	October 31, 2017
Annual Approval	Board Audit Committee	April 30, 2019
Annual Approval	Board Audit Committee	April 28, 2020
Annual Approval	Board Audit Committee	May 4, 2021
Annual Approval – non-substantial changes to Roles & Responsibilities	Board Audit Committee	May 3, 2022
Annual Approval – minor edits, updated policy owner	Board Audit Committee	May 2, 2023
Annual Approval – non-substantial changes; updated policy owner	Board Audit Committee	April 30, 2024
Annual Approval	Board Audit Committee	April 29, 2025
Annual Approval – added General Counsel review responsibilities	Board Audit Committee	May 5, 2026

1. OBJECTIVE

The purpose of the Whistleblower Policy is to enable any BOKF officer, employee, or any of its vendors, contractors, customers, shareholders, or any other person ("covered persons") with direct knowledge about BOKF to report in good faith, without fear of retaliation, any of the following situations: (i) a suspected violation of any state or federal law or regulation related to accounting, internal controls or auditing matters; (ii) a suspected violation of any securities laws or any other unlawful or unethical practice or activity; or (iii) a suspected violation of BOKF's Standard of Conduct ("SOC") and Code of Ethics ("Code").

The objectives of the Policy are to:

- Inform covered persons of their responsibility to report, in good faith, suspected violations
- Provide reporting methods for covered persons to use when reporting a suspected violation
- Provide for reasonable confidentiality with respect to reporting by covered persons
- Ensure BOKF management investigates reported concerns in a timely manner and acts on the findings as appropriate
- Protect covered persons, who in good faith disclose information about suspected wrongdoing, from retaliatory action

2. SCOPE

Each of BOKF's directors, officers, and employees is obligated to promptly report, in good faith, any suspected illegal or unethical practice or activity including, but not limited to questionable or improper accounting or auditing matters, any violation of the Code or applicable laws, rules and regulations.

Reportable concerns under the Policy include, but are not limited to:

- Illegal or fraudulent activity such as bank fraud, wire fraud, mail fraud, securities fraud, and violation of any SEC or other federal or state law, rule or regulation relating to fraud against BOKF's shareholders;
- Questionable accounting, internal controls and auditing matters, such as:
    - fraud or material error in the preparation, evaluation, review or audit of any financial statement of BOKF or any of its subsidiaries or affiliates
    - fraud or material error in the recording and maintenance of financial records of BOKF or any of its subsidiaries or affiliates
    - deficiencies in or noncompliance with BOKF or any of its subsidiaries or affiliates' internal accounting controls
    - misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports, audit reports, or official records of BOKF or any of its subsidiaries or affiliates
    - deviation from the full and fair reporting of BOKF's financial condition;
- Concerns regarding sales practices and potential customer impact from sales practices;
- Conflicts of interest, dishonest or unethical conduct, or inaccurate disclosures in BOKF's SEC reports, bank regulatory filings and other public disclosures; or

- Violations of the Code, SOC, or any other violations of laws, rules or regulations, including but not limited to employment discrimination laws.

3. POLICY DETAILS

3.1 ACTING IN GOOD FAITH

Covered persons who report a concern must act in good faith when reporting a violation of the Code or SOC, or applicable laws, rules and regulations.

3.2 CONFIDENTIALITY

Reports will be treated with reasonable confidentiality. The covered person's identification will be kept confidential other than to those who need to know in order to conduct a thorough investigation of the report, such as designated human resources, audit, compliance personnel or other individuals and as is consistent with legal and regulatory requirements.

Nothing in this Policy is intended to, or shall, in any way limit the right of a covered person to disclose information to the SEC pursuant to Section 21F of the Securities Exchange Act of 1934, as amended, or the rules of the SEC adopted pursuant to Section 21F. If an employee is concerned that Section 21F is being violated, that employee has an obligation to report the suspected violation by way of one of the Reporting Methods in Paragraph 3.6 below.

Nothing in this Policy is intended to, or shall, limit an employee's rights pursuant to the National Labor Relations Act ("NLRA"). If an employee is concerned that the NLRA is being violated, that employee has an obligation to report the suspected NLRA violation by way of one of the Reporting Methods in Paragraph 3.6 below.

3.3 NO RETALIATION

BOKF does not tolerate retaliation for engaging in a protected reporting activity. Retaliation is both unethical and unlawful. Any employee who retaliates against another employee for engaging in a protected reporting activity will be subject to disciplinary action, up to and including immediate termination of employment.

Employees should report suspected retaliation by way of one of the Reporting Methods in Paragraph 3.6 below.

3.4 DEFEND TRADE SECRETS NOTICE

Pursuant to the Defend Trade Secrets Act of 2016, BOKF provides the following notice:

An individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that (a) is made in confidence to a Federal, State, or local government official or to an attorney; and (b) solely for the purpose of reporting or investigating a suspected violation of law. An individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding subject to the court's protective order, if the individual files any document containing the trade secret under seal; and does not disclose the trade secret, except pursuant to court order.

3.5 OVERSIGHT AND MANAGEMENT

The Board of Directors is responsible for providing direction, authority and oversight of BOKF's management practices. The Director, Enterprise Risk & Governance is responsible for the Whistleblower Policy and reports to the Chief Risk Officer who reports administratively to the Chief Executive Officer and functionally to the Risk Committee of the Board. This Policy will be approved annually by the Audit Committee of the Board of Directors. To the extent there is a conflict between the Policy and any applicable law or regulation, the law or regulation shall govern.

3.6 REPORTING

Reporting Methods. Methods for reporting suspected illegal or unethical activities or practices, or a suspected Code or SOC violation are as set out below. The reporting method should be chosen based upon the covered person's level of comfort.

- Discuss the concern or suspected violation with a manager in the same business line;
- Contact the **Employee Resource Center** in Human Resources at (855) 269-2653 (855-2MY-BOKF) or EmployeeResourceCenter@bokf.com;
- Contact BOK's Risk Reporting Hotline to submit a report either anonymously or identifying the reporter, at the reporter's election, by telephone at (844-297-5946) or electronic submission at **BOKF Risk Reporting Hotline**.
- Contact the SEC in an appropriate manner for securities law violations. Information can be found at SEC.gov/whistleblower.

Covered persons should be aware that self-conducting an investigation may affect the integrity of the investigatory process and may implicate additional Company policies.

Covered persons may be asked to provide specific and factual information. Requests for information may include known information regarding:

- Name(s) of alleged wrongdoer(s);
- Date(s) the alleged wrongdoing took place and/or when the wrongdoing was identified;
- Location(s) where the alleged wrongdoing took place at the branch or office location level;
- Nature of the alleged wrongdoing and any supporting information; and
- Description and location of any information or documents supporting the report.

3.7 INVESTIGATION

The standard procedure upon receipt of reported concerns is as follows:

- The reported concern is logged in the secure case management system.
- The reporting person receives a confirmation number and/or password to facilitate communication, obtain case status updates if appropriate, and protect anonymity.

- Designated personnel receive notice that a concern was reported and investigate or assign personnel to investigate.
- Appropriate parties take corrective action as warranted.

3.8 RESULTS OF INVESTIGATION

- Reporting persons should be aware that the results of an investigation and action taken may not be shared with reporting persons (and often are not shared with reporting persons). Any lack of communication of results to the reporting person does not imply that action was not taken.

4. ROLES AND RESPONSIBILITIES

Party / Parties	Roles and responsibilities
Director, Enterprise Risk & Governance	Policy and program owner Responsible for overall management of the program
Chief Auditor	Receive and oversee the investigation of reported concerns,regarding: • accounting, financial reporting, internal controls, and auditing matters • the General Counsel Evaluate the impact of all reported concerns to BOKF's financial condition and reporting requirements Escalate concerns to executive management and the Audit Committee Chair, as appropriate, Present quarterly summary reports to Audit Committee
General Counsel	Receive and oversee the investigation of reports regarding: • any member of the executive leadership team (except reports involving the General Counsel, which shall be overseen by the Chief Auditor) Escalate the results of the investigation involving executive management (other than

	the CEO) to the CEO and to the Audit Committee, if appropriate; and, if involving the CEO, to the Audit Committee
Director of Employee Relations or the Employee Resource Center (ERC)	Serve as a point of contact for employees to report concerns or suspected violations Point of contact to report suspected retaliation
Risk Council	Reviews Policy annually Recommends for approval to the Audit Committee of the Board of Directors
Audit Committee of the Board of Directors, and/or the Chairperson of the Audit Committee	Responsible for establishing and maintaining procedures for the handling of complaints as outlined in section 301.4 of the Sarbanes Oxley Act of 2002. This includes approving changes to this Policy and program, as appropriate. Reviews Policy and program annually Directly receive and oversee the investigation of reported concerns regarding the Chief Auditor and CEO Review quarterly summary reports presented by the Chief Auditor of all reported concerns.

5. POLICY VIOLATIONS

Violations are subject to disciplinary action up to and including termination of employment.

6. RETENTION

Documentation pertaining to a reported concern will be retained in compliance with BOKF's document retention policy.

7. DEFINITIONS AND ABBREVIATIONS

Term	Meaning
Whistleblower	Someone who exposes prohibited activity occurring in an organization.
Covered Person(s)	BOKF officer, employee, or any of its vendors, contractors, customers, shareholders, or any other person with knowledge of the alleged prohibited activity.

8. ASSOCIATED DOCUMENTS

BOKF Standards of Conduct and Code of Ethics
BOKF Human Resources Policies and Procedures
Equal Employment Opportunity and Anti-Harassment Policy
BOKF Consumer Sales Tracking Rules and Guidelines