

CENTRAL BANCOMPANY, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

The Board of Directors of Central Bancompany, Inc. (with its subsidiaries, the “Company”) has adopted this code of ethics (this “Code”) to support the Company’s long-standing principles of honesty, fair dealings, and trust. This Code is not all-inclusive and is intended to supplement the good judgment, sound business decisions, and common sense expected from all directors, officers, and employees of the Company.

All directors, officers and employees of the Company are expected to be familiar with the Code and to adhere to those principles and procedures set forth in the Code which apply to them, in addition to other policies adopted by the Company that apply to his or her relationship with the Company. The Code will be available on the Company’s intranet and available through the Company’s website at www.centralbank.net. Directors, advisory directors, officers, and employees will receive a copy of this Code upon commencement of their relationships with the Company. Failure to comply with the Code will be investigated and may result in disciplinary action, up to and including termination or removal from a position with the Company. If necessary, the Company will report violations of the Code to the proper regulatory or law enforcement officials.

Any questions about this Code should be directed to the Company’s Legal Department.

I. Honest and Candid Conduct

Each director, officer and employee owes a duty to the Company to act with integrity. They are expected to be honest and fair in their interactions with customers, vendors, suppliers, competitors, regulatory authorities, and each other, while still maintaining the confidentiality of information when required or consistent with the Company’s policies. Company directors, officers, and employees are expected to adhere to a high standard of business ethics, complying with all laws, rules, regulations, accounting standards, and Company policies.

II. Confidentiality

During the course of their relationship with the Company, directors, officers and employees often learn confidential or proprietary information about the Company. Confidential Information includes, but is not limited to, trade secrets and proprietary information relating to the details of the Company’s business (banking, wealth management, lending, treasury services, deposit accounts, and related products and services), non-public personal information about current or potential customers, nonpublic financial or accounting data, budgets, forecasts, business plans, intellectual property, current and future products and services, marketing strategies, pricing and pricing strategies, investment plans and strategies, information on potential acquisitions or strategic initiatives, or other information declared to be of a confidential nature of the Company and its customers. Confidential Information of the Company, and of other companies, includes any non-public information that would be harmful to the relevant company or useful or helpful to competitors if disclosed.

Any information not publicly shared by the Company should be presumed to be confidential in nature and should be protected from theft, loss, or unauthorized disclosure.

Confidential Information shall not be disclosed, discussed, or made available to anyone outside of the Company. It should only be used for legitimate Company business purposes as necessary, but never used for personal gain or benefit. Directors, officers and employees must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized by the Company or legally mandated. These obligations apply after a Company official's employment or association with the Company end; therefore, all confidential information is required to be returned to the Company upon the termination of the employment or association.

III. Conflicts of Interest

A "conflict of interest" occurs when the private interest of a director, officer, or employee, or their family member, interferes or appears to interfere or is otherwise incompatible with the interests of the Company. A conflict of interest can arise when a director, officer or employee takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. All Company officials are expected to avoid situations that may lead to conflict, or the appearance of conflict, between the official's self-interest and his or her duty to the Company.

Service to the Company should never be subordinated to personal gain or advantage. Conflicts of interest should, wherever possible, be avoided. Any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest should be discussed with the Legal Department. The matter will be investigated to determine whether a conflict of interest exists and the best course to remedy or avoid the conflict of interest.

Certain business units (for example, Wealth Management) have adopted policies addressing additional specific or potential conflicts of interest. The employees and officers affected by these policies should be aware of and in compliance with these policies.

IV. Outside Business Interests

Before agreeing to act as a director, consultant, officer, or other agent for another entity, a Company employee or officer should review the request with the Company's Legal Department. Directors of the Company should provide notice of new or potential director positions with other entities to the Nominating and Governance Committee for review and consent. Directors should not accept director positions with other financial institutions without the express consent of the Nominating and Governance Committee.

The Company offers fiduciary services in the course of its business and routinely serves as executor, trustee, or guardian of estates of individuals. Directors, officers, and employees may serve as fiduciaries for members of their own families, but should consult with the Legal Department if requested to serve in a similar capacity for a non-related individual or estate before accepting the appointment.

V. Disclosure

Each director, officer, or employee involved in the Company's disclosure process, including the Chief Executive Officer, the Chief Financial Officer and any senior accounting officers (the "Senior Financial Officers") is required to be familiar with and comply with the

Company's disclosure controls and procedures and internal control over financial reporting for those duties within that officer's area of responsibility. The Company requires Senior Financial Officers and other employees to provide full, fair, accurate, timely, and understandable disclosures in reports and documents that are filed with, or submitted to, the Securities Exchange Commission and in other public communications made by the Company. All such disclosures must comply with applicable federal securities laws and SEC regulations.

Each Senior Financial Officer and any other employee, officer, or director involved with the disclosure process should ensure they are familiar with the disclosure requirements, review and analyze proposed disclosures for accuracy and completeness, and not knowingly misrepresent (or cause others to misrepresent) facts about the Company to others, including regulatory officials and independent auditors.

VI. Compliance with Laws and Regulations

It is the Company's policy that all directors, officers, and employees shall comply with all applicable laws, rules and regulations. It is the personal responsibility of each director, officer and employee to adhere to the standards and restrictions imposed by those laws, rules and regulations.

A. Insider Trading

The Company requires all directors, officers, employees, consultants, contract workers, and temporary staff to comply with its Insider Trading Policy.

Any director, officer or employee who is uncertain about the legal rules involving a purchase or sale of any Company securities or any securities in companies that he or she is familiar with by virtue of his or her work for the Company, should consult with the Company's Legal Department and the Company's Insider Trading Policy before making any such purchase or sale.

B. Bank Bribery Act; Gifts

The Company expects compliance with the Bank Bribery Act. No Company official (employee, officer, director, agent or attorney of the Company) shall solicit (other than for the Company) anything of value from anyone in return for any business, service, or confidential information of the Company. Further, no Company official shall accept and retain anything of value (other than normal, authorized compensation) from anyone in connection with the Company's business either before or after a transaction is discussed or consummated.

There are certain instances when a Company official may appropriately accept gifts; however, Company officials should always be mindful of the motive or intent behind a gift. Caution should be exercised to avoid the appearance of improper influence over business decisions of the Company. Exceptions to the general prohibition include, but are not limited to:

- Acceptance of gifts, gratuities, amenities, or favors based on obvious family or personal relationships (such as those between the parents, children, or spouse of a Company official) where the circumstances make it clear that it is those

relationships rather than the business of the Company that are the motivating factors;

- Acceptance of unsolicited meals, refreshments, travel arrangements or accommodations, entrance to sporting events, or entertainment of reasonable value in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions;
- Acceptance of loans from other banks or financial institutions on customary terms to finance proper and usual activities of Company officials, such as home mortgage loans, except where prohibited by law;
- Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars and similar items;
- Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers;
- Acceptance of gifts of reasonable value that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, holiday or birthday in an amount up to \$200;
- Acceptance of a prize, drawing or gift having a value of \$200 or less provided at an event sponsored by a professional organization or customer, vendor, supplier or consultant of the Company;
- Acceptance of an honorarium, travel, lodging or meal expense for a speech or presentation at an event sponsored by a professional organization or customer, vendor, supplier or consultant of the Company, provided that the Company official receives prior approval by a supervisor (in the case of an employee) or the Board of Directors (in the case of a Director); or
- Acceptance of a civic, charitable, educational, or religious organization award for recognition of service and accomplishment.

In the event a Company official is offered, receives, or anticipates receiving anything of value from a customer, vendor, supplier or consultant of the Company, beyond what is expressly authorized above, the Company official should provide written notice to the Legal Department. Any Company official with knowledge of another Company official receiving the same should likewise notify the Legal Department to review and investigate as necessary.

C. General Conduct

Company officials should not engage in criminal activity, dishonest behavior, or disgraceful conduct in public.

VII. Corporate Opportunities

Directors, officers and employees owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Directors, officers and employees are prohibited from taking (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. More generally, directors, officers and employees are prohibited from using corporate property, information or position for personal gain and from competing with the Company.

VIII. Reporting and Accountability

The Audit Committee is responsible for applying this Code to specific situations in which questions are presented to it and has the authority to interpret this Code in any particular situation. Any director, officer or employee who becomes aware of any existing or potential violation of this Code is required to notify the Legal Department promptly. Failure to do so is itself a violation of this Code.

Any questions relating to how this Code should be interpreted or applied should be addressed to the Legal Department. A director, officer or employee who is unsure of whether a situation violates this Code should discuss the situation with the Legal Department promptly. Retaliation against a reporting officer, director, or employee will not be tolerated by the Company.

The Audit Committee will work with the Company's Legal Department to take all action they consider appropriate to investigate any violations reported to them. If a violation has occurred, the Company will take such disciplinary or preventive action as it deems appropriate, after consultation with the Audit Committee, in the case of a director or executive officer, or the Chief Executive Officer, in the case of any other employee.

Upon being notified that a violation has occurred, the Board of Directors or Chief Executive Officer will take such disciplinary or preventive action as they deem appropriate, up to and including dismissal or, in the event of criminal or other serious violations of law, notification of appropriate governmental authorities.

IX. Fair Dealing

The Company does not seek competitive advantages through illegal or unethical business practices. Each director, officer and employee should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors and employees. No director, officer and employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

Company officials should not use confidential or proprietary information acquired in the course of employment with another entity in furtherance of Company duties. Company associates should reveal the existence of non-solicitation, non-compete, confidentiality, or other similar agreements with former employers that serve to restrict the associate's performance and responsibilities to the Company.

X. Protection and Proper Use of Company Assets

All directors, officers and employees should protect the Company's assets and ensure their efficient use in accordance with the Company's Acceptable Use Policy. All Company assets (including electronically stored data or other computer or electronic resources) should be used only for legitimate business purposes. Directors, officers, and employees should not permit Company assets to be lost, damaged, stolen, or used in an unauthorized manner.

XI. Books and Records

Company officials have an obligation to maintain the Company's business records, including financial records, in accordance with applicable laws, regulations, and the Company's record retention policies. Company officials are prohibited from knowingly destroying records relevant to pending or threatened litigation or governmental proceedings.

The Company requires financial reports, accounts, books, statements, and documents to be prepared and maintained in a manner that accurately reflects financial condition of the Company and in accordance with applicable accounting procedures. Company officials are prohibited from changing or otherwise altering the financial records of the Company to mislead those who receive them or conceal any information. Further, no Company official should encourage any other person to change or alter the financial records of the Company or take any other action intended to fraudulently influence, coerce, manipulate, or mislead internal or external auditors or examiners during their review or audit of the Company's financial information and related records.

XII. Outside Activities; Political Activities

Company officials are encouraged to participate in civic and charitable activities or other non-profit organizations. These activities should not conflict or compete with the Company's business, interfere with an employee's responsibilities, damage the Company's reputation, or imply that the Company has sponsored or supports an outside organization. Similarly, employees shall not participate in political activities during normal working hours. Company time, resources, facilities, or property shall not be used on behalf of any political action, committee, or candidate. The Legal Department shall be consulted prior to any Company employee or officer running for political office. The Legal Department shall also be consulted prior to any Company contributions to a candidate or political action committee to ensure compliance with state and federal campaign contribution laws.

XIII. Waivers

While rare, the Company may approve a request to waive some provisions of this Code. Any waiver of the Code for executive officers or directors of the Company may be made only by the Board of Directors or the Executive Committee of the Board and must be promptly disclosed as required by SEC or applicable exchange listing rules. Any waiver for other employees may be made only by request to the Legal Department of the Company, who will consult with the Chief Executive Officer, Chief Audit Officer, or the Audit Committee, as he or she sees fit.

XIV. Reporting

The Company has engaged a third party provider to establish an Ethics Hotline for any officer, employee, director, customer, or other person with a relationship to the Company to report alleged violations of this Code of Ethics or other required conduct. Violations can be reported through the toll-free hotline (1-800-747-1428) or at www.mycompliancereport.com using code CTBEH. Anonymous reports can be made 24 hours a day, 7 days a week. The Company will investigate all reports of violations of this Code of Ethics and other unlawful

behaviors. Other reports can be made through the Company's Human Resources Department and Legal Department.