

## **INDEPENDENT BANK CORPORATION**

### **CODE OF ETHICS FOR CHIEF EXECUTIVE OFFICER AND SENIOR FINANCIAL OFFICERS**

#### **INTRODUCTION**

Independent Bank Corporation's (the "Company") Employee Code of Conduct has been designed to promote honest and ethical behavior at all levels of the organization. While all employees and officers of the Company are bound by the Employee Code of Conduct, the Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer and Controller hold significant positions of leadership and trust at the Company and must follow the highest standards of professional and ethical conduct in performing their respective duties. These individuals must set an exemplary standard of conduct for the Company, particularly in the areas of finance, internal control and accounting. These individuals are also in a unique position to ensure that the interests of the Company's shareholders, employees and customers are protected and preserved. Accordingly, the Chief Executive Officer, the Chief Financial Officer, Chief Accounting Officer and the Controller will adhere to the Employee Code of Conduct as well as the additional policies and procedures described below in the Code of Ethics for Chief Executive Officer and Senior Financial Officers.

#### **CODE OF ETHICS FOR CHIEF EXECUTIVE OFFICER AND SENIOR FINANCIAL OFFICERS**

The Chief Executive Officer and each person who has been designated by the Board of Directors of the Company as a senior financial officer (presently the Chief Financial Officer, Chief Accounting Officer and the Controller), shall, as a condition of employment by the Company, be required to sign and deliver to the Company the following statement:

In my role as the Chief Executive Officer or as a senior financial officer of Independent Bank Corporation (the "Company"), I certify to the Company and the Audit Committee of the Board of Directors of the Company, that I adhere to and advocate the following principles and responsibilities governing my professional and ethical conduct, and to the best of my knowledge and ability:

1. Will act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
2. Will report to my supervisor or to the Board of Directors any material transaction or relationship that might reasonably be expected to give rise to a conflict of interest.
3. Will engage in and promote honest and ethical conduct among employees under my supervision and throughout the Company.
4. Will provide full, fair, accurate, timely and understandable disclosures in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission, banking regulators, shareholders and other constituents as well as in other communications made by the Company.

**Independent Bank Corporation**

**Prepared By: Independent Bank Corporation**

**Approved By: Board of Directors**

**Last Prior Revision Date: June 18, 2024**

**Approval Date: June 17, 2025**

5. Will comply with rules and regulations of federal, state, and local governments, and other appropriate private and public regulatory agencies, including all such agencies that regulate the Company and its subsidiaries.
6. Will act in good faith, responsibly, with due care, competence and diligence, without knowingly misrepresenting material facts or allowing my independent judgment to be subordinated or otherwise compromised.
7. Will respect the confidentiality of information acquired in the course of my work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of my work will not be used for my personal advantage.
8. Will share knowledge and skills with others to improve the Company's communications to its shareholders and other constituents.
9. Will comply with and adhere to each and all of the Company's policies and practices, including those policies governing accounting and financial reporting practices and procedures.
10. Will responsibly use and control all Company assets, resources and information entrusted to me.

**WAIVERS OF THE CODE**

The Audit Committee, acting at the direction of the Board of Directors, shall have the sole authority to approve any waiver or deviation from this Code of Ethics. Any waiver granted by the Audit Committee and the reasons for the waiver will be publicly disclosed as required by applicable law. Any changes or amendments to this Code of Ethics must be approved by the Board of Directors.

**VIOLATIONS OF THIS CODE OR QUESTIONS CONCERNING THIS CODE**

Questions concerning this Code of Ethics may be directed to the Company's outside legal counsel or to the Chairman of the Company's Audit Committee. Violations of this Code of Ethics shall be promptly reported to the Chairman of the Company's Audit Committee or the Company's Director of Internal Audit or if the reporting individual wishes to remain anonymous, he/she may utilize the Company's Whistleblower Hotline as described in the Policy Regarding the Resolution of Reports on the Company's Accounting, Internal Controls and Other Business Practices.