



Code of Conduct

Issued: February 2026







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Our Code

OUR GUIDE TO OPERATING WITH INTEGRITY

At First Interstate, we act with integrity by using a strong ethical and moral compass to guide our decisions and actions. Our Code of Conduct (“Code”) provides additional guidance to operating with integrity. We count on every employee and director to follow our Code and make decisions that will preserve the trust that others have placed in us. Any failure to comply with any provision of this code may result in disciplinary action, potentially including termination of employment, at the Company’s discretion.

The Code is designed to provide an overview of the laws, regulations, and Company policies that governs our business. This Code, together with our Employee Handbook, and Company policies, are intended to serve as resources when we are faced with circumstances that may raise ethics or compliance issues or when we have questions about what to do in specific situations. Directors must also comply with their duties of care, loyalty, disclosure, and candor.

Our Code is a great resource, but it doesn’t cover every situation, which is why we rely on you to use good judgment in everything that you do and to ask for help if you ever have questions or concerns.



Q&A

WHERE CAN I FIND COMPANY POLICIES?

You can find many of our policies on our Company intranet site, Inet. You can also ask your manager or Human Resources Business Partner for copies of applicable policies.

Not sure? Ask yourself:



If you can answer “Yes” to all of these questions, it’s probably safe to move forward. But a “No” or “Not Sure” to any of them should cause you to stop and reconsider. It is always appropriate—in any situation, under any circumstances—to ask for help.

RESPONSIBILITY FOR OUR CODE

Our Code applies to every First Interstate employee and to our Board of Directors; it governs every business decision we make. (The Code does not apply to advisory directors of First Interstate, who are instead governed by an Advisory Director Agreement.) Always follow our Code, the Company's policies and procedures, and the laws and regulations of the state where you work. And, complete your assigned training—it's the best way to stay up-to-date on what's expected of you.

If you see or suspect anything illegal or unethical, share your concerns promptly and cooperate fully and honestly in any internal investigation. Be aware that anyone who violates the Code, Company policies or procedures, or federal or state laws may face disciplinary action, up to and including termination of employment.

While all employees are expected to act ethically, each manager and leader at First Interstate has the increased responsibility of leading by example. We expect our leaders and managers to serve as positive role models and inspire others to embrace our Code by:

- Promoting our culture of integrity;
- Encouraging and demonstrating ethical decision-making;
- Creating a workplace where employees feel comfortable coming forward with questions or concerns;
- Preventing retaliation against those who speak up; and
- Seeking help in resolving and escalating issues when they arise.

Q&A

I SUSPECT – BUT AM NOT CERTAIN – THAT SOMEONE IS VIOLATING OUR CODE. SHOULD I KEEP CONCERNS TO MYSELF?

No. If you suspect a violation, say something. It's better to raise a potential problem than to wait and risk harm to others or to the Company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out you were mistaken.

NON-RETALIATION

First Interstate does not tolerate any retaliatory action against any individual for good-faith reporting of suspected unethical or illegal activities, including possible violations of this Code, violations of laws, rules, or regulations by others, or any other serious issues. Retaliation against an employee for reporting an issue in good faith is itself a violation of our Code. If you know or suspect that retaliation has occurred or is occurring, you should report it.

We investigate all retaliation allegations and, if substantiated, appropriate disciplinary action will be taken, up to and including termination of employment.

Our Workplace

WHERE TO GO FOR HELP

In most cases, your manager should be your first point of contact should you have questions, problems, or concerns. He or she is likely in the best position to understand your concern and take the appropriate action. If you are not comfortable going to your manager, if you have already shared a concern and feel it's not being addressed appropriately, or if your manager is unable to answer the question, please contact Human Resources, First Interstate's General Counsel, or another member of the Legal Department.

ETHICSPPOINT IS ALSO A RESOURCE AVAILABLE TO YOU.

EthicsPoint is operated by an independent reporting service and serves as a confidential way to speak up with questions or allegations of violations of our Code, our policies, our procedures, or the law. You may contact EthicsPoint 24 hours a day, 7 days a week, via phone or Web.

Report by phone:

1-844-762-5158

Report online:

<http://firstinterstatebank.ethicspoint.com>

or on your mobile device:

www.firstinterstatebankmobile.ethicspoint.com

When you contact EthicsPoint—whether by phone or Web—a web-based form will document the information you share, and it will be released to the Company to ensure that the individuals with the appropriate expertise can effectively address the question or concern. Rest assured

that the Company takes this process very seriously. It is important that you provide as much detail as possible. For example, let the Company know who, what, when, and where. The Company will strive to maintain the confidential nature of your submission.

HOW TO REQUEST A WAIVER

Waivers of compliance with any provision of this Code will be granted rarely, if at all. For an executive officer or director, any waiver must be approved by the board of directors. For all other employees, any waiver must be approved by the General Counsel. All waivers must be in writing and in advance of any conduct requiring a waiver. In accordance with applicable law, the Company will disclose waivers of compliance to appropriate parties.

RESPECTING EACH OTHER

At First Interstate, we put people first by treating others like we want to be treated. We're one team, but we represent many ideas, experiences, and backgrounds. Respect in the workplace, along with individual excellence and collaborative teamwork, is essential to advancing our goals and initiatives. Our success can be achieved only when we treat everyone, both inside and outside our Company, with respect.

Diversity and Inclusion

We strive to attract, develop, and retain a workforce that is diverse. At First Interstate, promoting diversity and inclusion means engaging and respecting the talents, perspectives, and uniqueness in all of us. We encourage diversity and inclusion by:

- Respecting the diversity of each other's talents, abilities, and experiences;

- Fostering an atmosphere of trust, openness, and candor;
- Offering innovative products and services our diverse individual and business clients need to achieve their goals; and
- Engaging the talents and strengths of our employees to make a meaningful impact in the communities where we live and work.

First Interstate is an equal opportunity employer and complies with all immigration laws and employs only people who are lawfully authorized to work. Whenever possible, we make reasonable accommodations for current and prospective employees with disabilities so that they may participate fully in employment opportunities.

Harassment and Discrimination

First Interstate seeks to maintain a working atmosphere free from harassment, discrimination, intimidation, or unwelcome, offensive, or inappropriate conduct, including sexual overtures, offensive jokes, graphic material, etc.

Q&A

MY MANAGER OFTEN LOSES HIS TEMPER AND YELLS AT ALL THE PEOPLE ON THE TEAM WHEN WE MISS A DEADLINE. IS THAT HARASSMENT?

It depends, but regardless, the situation creates a negative work environment. This behavior is something the Company will address because it violates the commitment we've made to a respectful workplace. Share your concerns with HR, the Legal Department, or EthicsPoint.





Verbal or physical conduct of a demeaning or sexual nature that creates an intimidating, hostile, or offensive working environment that in any way affects the employment relationship or is otherwise deemed by First Interstate to be offensive and/or inappropriate is not permitted. Conduct may be deemed offensive behavior even if it does not meet the legal definition of harassment under the law.

You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable, whether inside or outside the workplace. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they reasonably impact others, regardless of your intentions.

Solicitation on Company Property

To protect employees and clients from embarrassment or hardship, no one (including employees and clients) may do any of the following on Company property:

- Solicit funds, votes, or signatures;
- Distribute literature, business cards, petitions, or sales promotions;
- Conduct membership drives; or
- Sell tickets.

These prohibitions do not apply to community fund-raising programs, to controlled solicitation of gifts or expressions of sympathy for Company employees, or to charitable solicitations, because these activities are part of the Company's commitment to community.

WORKPLACE SAFETY

First Interstate is committed to safeguarding the health and safety of our employees, visitors, clients, and communities.

We provide a variety of programs and procedures to help ensure the safety of all employees at work. By teaming up with your manager or supervisor, you are the best link to keeping the workplace safe

Workplace Violence

First Interstate has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act of violence, or threatening conduct or language, that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression, or hazing.

Our Company also prohibits the possession of weapons on First Interstate property, at work-related functions, or while performing Company business. This includes concealed weapons for which a person may have a permit, and applies to any person who is on Company premises, with the exception of law enforcement or designated security personnel.

Don't delay—speak up and report threats or potential violence immediately to management, Financial Crimes, or any local authorities.

DID YOU KNOW?

If you obtain a restraining order that lists First Interstate locations as protected areas, you must report this to your manager and Financial Crimes.

Be Aware

Employees must take workplace safety very seriously. Every employee is empowered to take immediate action for people's safety regardless of role, title, or responsibility. Be alert to what is going on around you, observe good security practices, and speak up if you hear about or see suspicious, threatening, or violent activity.

Drug-and Alcohol-Free Workplace

To help ensure a safe, healthy, and productive work environment for our employees and others, First Interstate has adopted a policy of maintaining a workplace free of drug and alcohol abuse. You are not permitted to sell, buy, or attempt to buy alcohol or any controlled substance on First Interstate property, while conducting Company business, or while operating a Company vehicle. Unless prescribed by a licensed physician, you are also not permitted to use, possess, or be under the influence of any controlled substance on First Interstate property, while conducting Company business, or while operating a Company vehicle. You should never engage in Company business while impaired due to use of a controlled substance, even if prescribed. And you should never operate a Company vehicle if a prescribed controlled substance warns against driving or using heavy machinery while under the influence of the substance.

There may be instances where drinking alcoholic beverages on Company premises at Company-related functions, or during business hours, is permitted if it is provided by the Company and approved by Senior Management. But make sure you always exercise both moderation and good judgment, and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law.



Additionally, employees and directors are expected to be fit for work or service at all times when acting for the Company or serving in their official capacity. If you are found to be unfit for work or service due to alcohol or drug use—including legal drugs prescribed by a physician—you may be sent home and may be subject to disciplinary action.

DID YOU KNOW?

- Drinking a beer with your friends during a lunch break
 - Giving a coworker your prescription medicine
 - Coming to work impaired from the night before
- ...all violate our Code of Conduct.



Q&A

I'M GOING TO A RECEPTION HOSTED BY ONE OF MY CLIENTS. CAN I DRINK ALCOHOL THERE?

Yes, if you are legally permitted to drink alcohol, drink responsibly, and don't return to work after the event. And don't drink and drive.

Vehicle Safety

If your job includes driving a personal, Company-owned, or rental car, you must comply with all federal and state laws. This includes restrictions on using mobile devices while driving. Texting and using smart phone features or apps are prohibited while you are driving.

For the safety of yourself and others, avoid making or receiving telephone calls while you're driving. If you must make or take a call, use an approved hands-free device where permitted by law or pull over and park safely first.

Photographic Equipment

The use of photographic equipment (including film, digital cameras, video recorders, or any other device capable of capturing or reproducing an image) on First Interstate property by unauthorized parties is prohibited.

If you see an unauthorized person taking photos inside or outside of any First Interstate facility, please contact the senior manager of the facility immediately or contact Financial Crimes to report the incident.

Q&A

MY MANAGER HOLDS MEETINGS AT WHICH CONFIDENTIAL CLIENT INFORMATION IS TYPICALLY DISCUSSED. I ATTEND THESE CALLS VIA TELECONFERENCE. CAN I RECORD THESE MEETINGS?

No, you may take written notes for your records or to share with coworkers.

TO LEARN MORE:

[Photography, Audio or Video Recording Procedure](#)

Our Clients

RESPECTING OUR CLIENTS

At First Interstate, we strive for excellence by always doing our best and then getting better. Creating the best experience for our clients is one of the characteristics that sets us apart from our competitors. We do what's best for our clients by:

- Protecting client and other confidential information and data;
- Helping them make informed financial choices and being honest and fair in our dealings and communications with them; and
- Providing timely and fair resolution to clients concerns and complaints.

DID YOU KNOW?

When your employment or your service as a director ends, you're still obligated to protect First Interstate's confidential information.

Keep Private Information Private

We respect the privacy of our clients, our coworkers, and others with whom we conduct business, and we handle their personal information with care. Information we gather, process, store, or transmit about First Interstate clients, employees, business partners, and others is considered to be First Interstate property. We are responsible for keeping confidential information safe and secure.

By accepting employment with First Interstate; receiving or accessing information about First Interstate clients, employees, or business partners; or agreeing to comply with this Code of Conduct, you agree that you will; to the maximum extent permitted by applicable law:

- Use confidential information only for legitimate Company business purposes and not for your personal gain or to compete with First Interstate;
- Not contact, directly or indirectly, during the time of your employment and for one year thereafter, any First Interstate client for the purpose of soliciting or inducing the client to obtain any product or service from another financial institution if the product or service is offered by or under development by First Interstate;
- Not contact, directly or indirectly, during the time of your employment and for one year thereafter, any First Interstate employee for purposes of soliciting, encouraging, or inducing the employee to leave First Interstate employment;
- Keep employees' and clients' personal information safe and secure and only share it with those who

Q&A

HOW DO THIS CODE OF CONDUCT'S CONFIDENTIALITY REQUIREMENTS RELATE TO MY ABILITY TO RAISE CONCERNS?

If you have concerns, please refer to the section of this Code on [page 7](#) entitled "Where to Go For Help." Additionally, the Company has established a [Whistleblower Policy](#) which provides additional information and is consistent with the requirements of this Code.



have a legitimate Company business need to know;

- Not share client information with anyone inside or outside the Company unless there is a First Interstate-related business need for doing so or unless it's required by law;
- Protect your user IDs and passwords (remember, you're responsible for any action taken under your user ID and for following Company requirements to prevent user ID misuse);
- Take care to protect Company-issued laptops, smartphones, and other electronic devices from theft, regardless of whether they contain confidential information;
- Not forward confidential information to personal email accounts (remember, all email is monitored by the Company); and
- Follow the processes and practices we have in place to protect our networks, computers, programs, and data from attack, damage, or unauthorized access.

Your business line may have additional information security requirements you need to follow. You're responsible for reporting any loss or unauthorized disclosure of confidential information to the Financial Crimes department at 406-237-2701.

TO LEARN MORE:

[Privacy Policy](#)

[Information Security Policy](#)

CONDUCTING BUSINESS FAIRLY, RESPONSIBLY, AND ETHICALLY

Money Laundering and Financial Crimes

Money laundering is the process of taking the proceeds of

criminal activity and making them appear legitimate. As a financial services provider, we have special responsibilities to help combat money laundering.

To prevent First Interstate from being used as a conduit for money laundering, terrorist financing, or other criminal activity, we comply with the Bank Secrecy Act (BSA) and related anti-money laundering (AML) laws and regulations. Failing to comply with these various laws can result in severe penalties.

You are responsible for being knowledgeable about and following First Interstate's policies and procedures for complying with BSA and AML laws and regulations. You must also complete all client due diligence requirements. Be alert to—and report—any suspicious activity to your manager or Financial Crimes, and complete all required anti-money laundering and related compliance training on a timely basis.

TO LEARN MORE:

[BSA-AML-CIP Policy](#)

[Office of Foreign Assets Control \(OFAC\) Policy](#)

DID YOU KNOW?

You may not tell anyone inside or outside First Interstate about current or past suspicious activity reports (SARs). SARs may be shared only on a need-to-know basis.

Antitrust and Competition Laws

While we do—and should—compete vigorously for business

opportunities, we must do so in a legitimate and ethical manner, always consistent with legal restrictions. Antitrust or competition laws are designed to protect a competitive free enterprise system. Antitrust laws are complex and violation of these laws may result in severe legal penalties for our Company and criminal charges for the individuals involved. General antitrust guidelines to keep in mind include the following:

- Do not talk about our business strategies and plans with competitors.
- Do not exchange competitively sensitive information with competitors.
- Do not boycott certain clients or third-party service providers.
- Do not abuse a position of market dominance.
- Do not enter into any agreements or understandings, whether formal or informal, with a competitor, including price fixing, bid rigging, market allocation, and agreements to restrict supply or fix resale prices.
- Do not require clients to engage in certain "tied" or reciprocal transactions. This is any transaction where a client is required to purchase or provide one product or service in exchange for another being made available.

If you have any questions or concerns regarding antitrust or competition laws, please consult with the Legal Department before taking action. If you suspect an antitrust violation, speak up and report it.

Fair Banking and Lending

At First Interstate we are committed to making financial products and services available to our clients and prospective clients on a fair, transparent, and consistent basis throughout the entire client relationship and product lifecycle. Always remember:

- To offer products and/or services to our clients that are in the client's best interest. The products and/or services must be explained in a way that the client can understand, and the terms and conditions must be appropriately and accurately outlined;
- To comply with all applicable fair lending and responsible banking laws and regulations; and
- To avoid unfair, deceptive, or abusive acts or practices (collectively called "UDAAP").

Q&A

A MAN AND A WOMAN CAME IN TO OUR BRANCH TODAY TO APPLY FOR AUTO LOANS. MY COWORKER TOLD THE WOMAN TO APPLY USING OUR WEBSITE, BUT HE HELPED THE MAN COMPLETE THE LOAN APPLICATION AT THE BRANCH. WHAT SHOULD I DO?

You should report the issue to your manager or using one of the resources listed on [page 7](#). Clients should be treated the same without regard to race, gender, national origin, religion, or membership in any other protected class.

TO LEARN MORE:

[Fair Banking Policy](#)

[Compliance Quick Reference UDAAP Guide](#)

Anti-Bribery

We expect our employees and business partners to work honestly and with integrity. Do not offer bribes, accept bribes, or let others bribe for you. You may not give, promise, or offer anything of value to any government



official or employee to influence a decision, secure an advantage, avoid a disadvantage, or obtain or retain business. Engaging in such behavior may expose you and First Interstate to civil and/or criminal liability, and you may harm our reputation and undermine the trust of our clients, shareholders, and communities.

TO LEARN MORE:

"Gifts and Entertainment," [page 23](#) of this Code

Insider Trading

- As employees and directors of First Interstate, you may be exposed to information about our company, or companies with which we interact, that is considered "material and non-public." Information that a reasonable investor would consider to be important when he or she is deciding to buy or sell

("trade") a security is called "material." When material information hasn't been publicly disclosed, it's called "inside" information. Having that knowledge makes you an "insider," and trading on this inside information is against the law. If in doubt, don't trade. Any non-compliance with First Interstate's Insider Trading Policy may be subject to discipline, including termination. *If you're not sure if information is considered "inside" information, ask the Legal Department about it before trading on it. If you're not sure if information has been released publicly, treat it as though it hasn't been.*

Examples of inside information include non-public information about mergers or acquisitions, sales or earnings results, financial forecasts, changes to the executive management team, pending lawsuits, or major wins or losses.

TO LEARN MORE:

[Insider Trading Policy](#)

Q&A

A GOVERNMENT EMPLOYEE ASKED IF I COULD HELP HIS DAUGHTER GET A MANAGEMENT TRAINEE POSITION AT OUR COMPANY. HE SAYS HE CAN MAKE IT WORTH MY WHILE. WHAT SHOULD I DO?

Don't do it. "Worth your while" suggests that the government official may be planning to do something improper in exchange for the favor. You can provide the government official with information about our Management Trainee program and allow his daughter to apply as all other candidates do.

Q&A

ONE OF MY CLIENTS HAS HAD GREAT SUCCESS WITH A NEW PRODUCT, AND THEY'RE LOOKING FOR ADDITIONAL FINANCING TO MAKE CAPITAL INVESTMENTS. I'D LIKE TO BUY MORE STOCK IN THE COMPANY BECAUSE ITS FUTURE LOOKS SO GOOD. CAN I BUY MORE STOCK AT THIS TIME?

No. You have inside information about the client. You can't trade in the Company's stock until the Company has publicly disclosed all the information about its product sales and expectations. Also, you may not pass this information along to anyone or recommend the purchase or sale of its stock to anyone during this period.

DID YOU KNOW?

- Insider trading rules apply to the material and non-public information of any publicly-traded company you learn about in the course of your employment. You might learn inside information about First Interstate, clients, vendors, business partners, or other publicly traded companies. It's illegal to buy or sell shares in these companies while you know inside information.
- Don't trade on material inside information, and don't tip off others (including your family and friends) so they may trade. "Tipping" is also a violation of insider trading laws.
- If you are advised that you are subject to a trading window or special blackout period, don't trade in First Interstate securities until the restriction has been lifted.

Personal Investment Activities

As a First Interstate employee, you must conduct your personal investment activities with our interests in mind. When you're trading in your personal accounts, you may not use First Interstate information to your personal benefit.

- Make responsible and lawful loan and investment decisions.
- Base your investment decisions on sound investment principles, not on short-term trading goals or speculation.
- Never engage in insider trading.

RESPONSIBLE MARKETING, SALES AND SERVICING ACTIVITIES

At First Interstate, we're proud to offer our clients the best products and services available to meet their diverse needs. We design fair and responsible products and services, and we market and advertise for them in a fair, transparent, and responsible way. We inform clients and potential clients about options that may be appropriate for them, and we explain terms and features in a fair and balanced way to help clients make informed decisions.

We also provide excellent service in a fair, responsible, and consistent manner. We listen to client feedback and monitor our servicing efforts, which include: handling inquiries and client complaints; ensuring timely and accurate transaction, payment and data processing; and managing fee practices, collection activities, account resolution and property disposition.

When we have an experience that doesn't meet our standards, may not comply with the letter or spirit of the law, or may create undue risk for our clients, we act promptly to do the right thing.

Sales must always be based on client needs or requests—they should never be the result of efforts to promote products or services to meet sales goals, incentives, or recognition goals.

Incentive Gaming

Incentive gaming and aggressive, deceptive, unfair, or abusive sales practices are strictly prohibited. You may not manipulate records, open bogus accounts, slam products, falsify applications, or skew results in any way for the benefit of yourself or other employees. Vendors and third parties are also prohibited from doing this in support of First Interstate, our clients, or potential clients.

Q&A

TO EARN INCENTIVES, A COWORKER IS ORDERING CREDIT CARDS FOR PREAPPROVED CLIENTS WITHOUT THEIR PERMISSION. WHAT SHOULD I DO?

You should report your coworker's behavior using the resources on [page 7](#). This behavior is a serious violation of our ethical standards.

COMPLAINTS

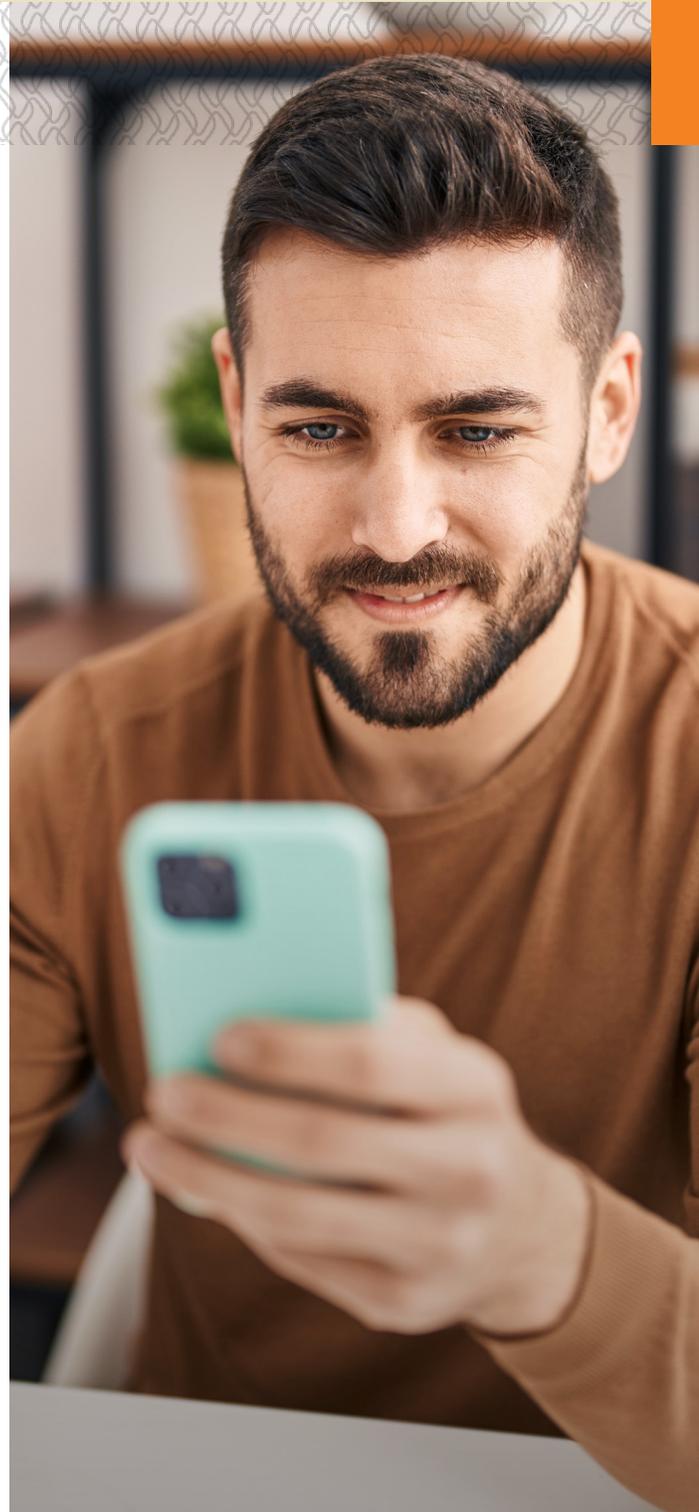
We address client complaints promptly and professionally. We:

- Investigate the circumstances surrounding complaints;
- Work to understand and address the client's issues and concerns as quickly as possible;
- Take appropriate action based on the investigation; and
- Use what we learn to improve the client experience and modify procedures.

You're responsible for reporting client complaints promptly, completely, and accurately through the corporate process of emailing Complaints@fib.com or your business line's complaint-handling process.

TO LEARN MORE:

[Complaint Resolution Procedure](#)



Our Shareholders

RESPONSIBILITY TO OUR SHAREHOLDERS

Acting with responsibility and transparency goes hand-in-hand with protecting shareholder value. Each employee creates value for our shareholders by putting our Company's interests first, maintaining accurate business records, and protecting and properly using Company resources, information, and property.

Accurate Business Records

Our long-term success depends, to a large extent, on how well we manage our business. Our records—and our recordkeeping—help us to fulfill our financial commitments and provide a picture of our financial health. They keep us accountable to our shareholders and investors and are the basis on which we make important strategic decisions. Records that are clear and complete and accurately reflect our business transactions are critical Company assets.

Each of us has an obligation to follow all internal controls in recording and maintaining our Company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement, or simply completing a time sheet, be honest, accurate and complete.

Reporting Concerns

You have the right—and the obligation—to report possible violations of accounting, audit, or internal control matters, disclosure obligations, laws, and Company policies without fear of discrimination, retaliation, threats, or harassment. Use the resources on [page 7](#) to report concerns.

TO LEARN MORE:

"Non-Retaliation", [page 6](#) of this Code.



Record Retention and Legal Hold Policies

As a company and financial institution, we are required to maintain certain records to meet our legal, tax, and regulatory requirements. You're responsible for retaining records as required by our record retention policies, and understanding and complying with legal record holds. Never dispose of information that may be relevant to current or threatened litigation until you are notified by the Legal Department that it is appropriate to do so.

Q&A

A CLIENT FORGOT TO HAVE HIS LOAN DOCUMENTS NOTARIZED. MY COWORKER TOLD ME THAT I SHOULD GO AHEAD AND NOTARIZE THEM SINCE WE KNOW THE CLIENT. MAY I DO THIS?

No. The notarization process requires both you, as the notary, and the signer to be physically present so you can verify the signer's identification and ensure he or she is signing the document voluntarily. You must follow the procedures of your notary license in your state.

Conflicts of Interest

AVOID CONFLICTS OF INTEREST

A conflict of interest can happen anytime something you do outside of the workplace interferes with, or appears to interfere with, the work you do inside the workplace. In all of your activities as a First Interstate employee or director, you must avoid any conflict, or the appearance of a conflict, between your personal interests and First Interstate's interests.

It isn't possible to list every situation that could present a conflict, but our Code describes some of the most common situations where conflicts typically arise. If you need guidance about these or other situations you may find yourself in, talk with your manager, contact the Legal Department, or use the resources listed on [page 7](#).

Outside Activities

Your outside activities must not compromise our interests, unless they are otherwise protected by law. Generally, activities that involve access to or disclosure of confidential information about First Interstate or its clients may be a conflict of interest. Also, affiliations with certain organizations may be conflicts of interest if they compete with First Interstate or are in substantial default to First Interstate on loans, contracts, or other obligations.

Below are some of the most common outside activities that can create actual or apparent conflicts of interest:

- **Outside employment.** If you are an employee, your manager must approve any outside employment. You may not take a second job (including self-employment) that:
 - Competes with any of our business activities;
 - Interferes with your job performance or work schedule;
 - Involves use of First Interstate equipment or resources;

- Violates your confidentiality obligations to First Interstate or its clients; or
- Has a negative impact on First Interstate.

This applies to all activities for which you'll be paid. It also applies to speaking and writing engagements, consulting engagements, and teaching positions where the subject matter relates to the business of First Interstate or your job responsibilities.

Keep in mind that First Interstate engages in a broad variety of business activities, so other businesses may be considered to be competing even if they don't directly compete with your particular duties at First Interstate.

Directors may accept outside employment, and are expected to notify the Chair of the Board or the Chair of the Governance and Nominating Committee before accepting employment with a business corporation or entity.

Q&A

I'M A PERSONAL BANKER. I ALSO HAVE A REAL ESTATE LICENSE AND WAS PLANNING TO WORK AS A REAL ESTATE AGENT ON THE SIDE. IS THIS A CONFLICT OF INTEREST?

Yes. As a real estate agent, you're in a position to recommend banking services to your clients that may include referrals to non-First Interstate financial institutions, which creates a conflict of interest. There may be very limited circumstances in non-retail lines of business where this activity may be approved. Consult with your manager and Human Resources before you perform any real estate work.

- **Outside for-profit board of directors positions.**

Several laws prohibit certain interlocking corporate directorships and management positions or have other restrictions regarding corporate directorships. You may not serve as a director of a publicly-traded corporation or a large, privately-held-for-profit business (i.e. one with annual revenues of \$25 million or more) without the approval of the Chief Executive Officer of First Interstate. Employees are required to report annually their service on such for-profit corporate boards of directors.

- **Nonprofit, family, community and charitable organizations.**

Commitment to Community is one of our core values. First Interstate encourages employees to take active part in organizations that make our communities better places to live and work. You may serve as an officer or board member of a nonprofit, family, community, or charitable organization, as long as it doesn't present a conflict of interest. You should not participate in any discussions or decisions regarding First Interstate business. Also, you must provide reasonable notice to your manager before you're elected or appointed to ensure no conflicts of interest exist.

- **Advisory boards and industry associations.**

First Interstate may ask you to serve on its behalf in industry or trade associations, client or supplier advisory boards, or similar organizations. As a representative of First Interstate, your actions must reflect our business interests. You may also serve in a personal capacity with the permission of the head of your business line if this doesn't present other conflicts of interest.

If an organization for which you represent First Interstate sponsors its own political action committee (PAC), you must not solicit for the PAC, sit on the PAC board or otherwise participate in political contribution decisions. Unless restricted by business line-specific policies, you may contribute personally to the PAC, but seeking reimbursement from First Interstate Bank is prohibited.

- **Political activity.** You generally may serve in an elective or government-appointed office if it doesn't interfere with your job performance or service as a director, use Company time or resources, or present conflicts of interest. If your political activity will require a significant amount of your time, you must receive written approval from your market president or unit manager (or, if you are an executive officer or director, from the Chair of the Board and Chair of the Governance and Nominations Committee) in advance of engaging in such activity. You must be clear you're not representing First Interstate. Also, you must provide reasonable notice to your manager before you're elected or appointed to ensure no conflicts of interest exist and to discuss recusal procedures if conflicts of interest arise during your term in office. If you're involved in First Interstate business with government entities, you may be subject to additional restrictions on your personal political activities.

Unless approved in writing in advance by the Company's Chief Executive Officer or General Counsel, all political activities by an employee or director must be undertaken as a private citizen and not as a representative of First Interstate. To make sure you are complying with this requirement:

- Do not conduct political activities on First Interstate premises, and do not use Company equipment, supplies, or facilities for such activity;
- Do not make political contributions in the form of cash, goods, or services directly or indirectly on behalf of First Interstate;
- Do not endorse any individual candidate or issue in any election on behalf of First Interstate;
- Do not use Company stationary or e-mail to write any communication with a political purpose (such as to support or oppose a candidate or issue); and
- Do not serve as the treasurer or assistant treasurer of a political campaign or PAC.

In addition, you're responsible for knowing about and complying with other laws or regulations that may apply to your business line and limit your outside activities.

DID YOU KNOW?

- You may make formal or informal commitments on behalf of First Interstate only with authorization and by following approved procedures. Approved commitments must be properly documented and retained.
- You may not offer opinions on legal or tax matters, and make sure you don't engage in the unauthorized practice of law.

Hiring of Current or Former Public Officials

If you're considering hiring someone who is a current or former public official, you must obtain pre-approval from the General Counsel. Certain restrictions that are designed to prevent conflicts of interest may apply.

Self-Dealing

You may not use your position at First Interstate to profit personally from information, corporate property, services or other business opportunities. You may not divert to yourself or to others business opportunities that belong to First Interstate Bank.

Personal Relationships

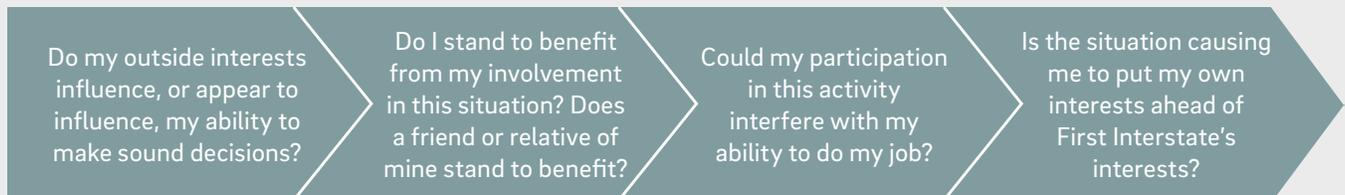
Working with or hiring a family member, a family member's company, or someone with whom you have a personal relationship may create a conflict of interest or the appearance of a conflict. Don't act for First Interstate in any transaction or business relationship that involves yourself, members of your family or other people or organizations where you or your family have significant personal connections, financial interests, or decision-making influence.

- Don't transact business on your own accounts, your family members' accounts or accounts for anyone with whom you have a significant personal relationship (financial or otherwise).

TO LEARN MORE:

[Anti-Nepotism Policy](#)

To determine if you have a conflict of interest that should be disclosed, ask yourself:



Gifts and Entertainment

An occasional gift or offer of entertainment is often viewed as a normal part of doing business. But sometimes even a well-intentioned gift or offer can cross the line. And any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate.

You are prohibited from providing, offering, or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage. Accepting or soliciting anything of value for the benefit of a third person or third party also is prohibited.

These restrictions generally don't apply to:

- Gifts or entertainment based on family relationships, where it's clear the relationship is the motivating factor for the gift (except in certain circumstances when the family member is an official or employee of a government entity that does or may do business with First Interstate);
- Awards given as part of approved Company-sponsored recognition programs; or
- Gifts between coworkers for an appropriate occasion and that are nominal in value (less than \$200).

Giving Gifts

You may give gifts only for legitimate business reasons and never to secure business or influence a decision. Your gifts should be reasonable and customary for the circumstances. You may never give gifts of cash. The guidelines in the section below ("Accepting Gifts") also apply to gifts provided by First Interstate employees. This includes meals, entertainment or anything else of value provided to federal, state, local, or foreign officials, or employees.

You're responsible for following business line-specific gift guidelines and standard expense reimbursement procedures.

TO LEARN MORE:

"Anti-Bribery," [page 15](#) of this Code

Accepting Gifts

You may never solicit or accept a gift for yourself or a third party in exchange for favorable business treatment. However, there are certain circumstances when accepting gifts or other items of value doesn't violate our gift policies.

This includes:

- Gifts that have a legitimate business purpose.
- Gifts that are nominal in value (less than \$200.00).
- Advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars, and similar items.
- Discounts or rebates on merchandise or services that are available to other clients under similar circumstances or as part of a discount program that First Interstate negotiates.
- Awards of reasonable value from civic, charitable, educational, or religious organizations for recognition of service and accomplishment.
- Gifts awarded as part of a random drawing, where there is no inference that accepting the gift could influence your First Interstate duties.
- The gift is not cash or a cash equivalent.
- Meals, entertainment, or events where:
 - The purpose is to hold bona fide business discussions or build better business relationships;
 - Your host is present;
 - Your attendance is related to your job duties;
 - You pay for your own travel and accommodations;
 - The level of expense is reasonable and customary for the circumstances; and
 - The relationship with the host, and the frequency of such invitations from one host, is not excessive.





- Food or beverages that can't be returned easily, as long as they're received on an occasion when gifts are customary, not extravagant and shared with coworkers.

We may make exceptions to allow employees or directors to accept reasonable entertainment, accommodations or gifts that exceed this policy when:

- A significant client or vendor sponsors an event.
- Attending an event is important to maintaining our relationship with that client or vendor.
- Refusal may damage the client relationship.

Q&A

I'M A TELLER, AND A REGULAR CLIENT GAVE ME A \$25 GIFT CARD TO A LOCAL COFFEE SHOP ON MY BIRTHDAY. MAY I KEEP IT?

This gift is acceptable unless your business line has more restrictive policies.

However, you must make an attempt to explain the First Interstate gift policy and to return or refuse the entertainment or gift. If continued refusal may irreparably damage the client relationship, you should consult with your manager and Human Resources to determine whether accepting the gift in goodwill (and not in return for special treatment) may be appropriate.

Q&A

I WAS INVITED TO ATTEND A LOCAL SPORTING EVENT WITH A CLIENT. MAY I ATTEND?

Yes, if the purpose is to hold bona fide business discussions or further the client relationship, unless your business line has a more restrictive policy. If the tickets are for your personal use and the client won't be attending with you, you may only accept the tickets if they comply with the requirements relating to accepting gifts.

I RECEIVED A GIFT FROM A CLIENT I KNOW I CAN'T ACCEPT. WHAT SHOULD I DO?

You may either return the gift to the client and politely explain our policy, or keep the gift and pay the amount above \$200 to the Company. If the gift is something perishable, like flowers or a food basket, where return is not really an option, place it in a break room where it can be enjoyed by everyone. If you have questions, contact the Legal Department.

FINANCIAL RESPONSIBILITY

Because of the nature of our business, you are expected to manage your personal financial matters prudently. Not doing so could undermine your professional credibility—and jeopardize your job.

Personal Finances

You may not participate in financial transactions with other employees, clients, or suppliers. In addition, you and your family members may not borrow money from or lend money to clients, suppliers, other employees, or independent contractors of First Interstate. However, you may borrow money from a client or supplier that is in the financial services business and appropriately chartered or licensed, as long as you don't receive preferential treatment. Additionally, if you are a director or executive officer and have a personal or business loan from First Interstate that becomes substandard, you may be subject to discipline up to and including termination.

This policy doesn't prevent you from borrowing money from or lending money to family members or friends, where personal relationships exist independently of First Interstate business. It also doesn't prohibit occasional loans of nominal value (such as for lunch or coffee) between employees, as long as the interactions are voluntary and don't include interest.

Misuse of Accounts and Products

If you misuse an employee checking account, other financial account, or any other First Interstate product or service, or if you don't pay promptly for services, where applicable—you may lose your account privileges. In some cases, you may face additional disciplinary action, including termination.

The following are examples of prohibited activities and don't cover all potential violations of federal, state, or local laws, or of First Interstate policies. These activities may result in immediate termination of employment:

- Kiting, which means floating funds between two or more accounts to cover withdrawals.
- Making false ATM deposits (intentionally depositing empty envelopes) or making inflated ATM deposits to receive immediate cash.
- Viewing employee or client account information for non-business reasons.

First Interstate reserves the right to monitor all account activity, subject to applicable law.

Q&A

MY COWORKER ASKED ME TO LEND HER \$75 SO SHE CAN PAY HER UTILITY BILL THIS MONTH. IS THIS OK?

No. A \$75 loan is not a nominal amount under our policy. The policy is designed to prevent you from becoming involved in coworkers' personal financial situations, because this can disrupt work relationships and create distractions in the workplace.

Business Expenses and Corporate Credit Cards

You must follow our guidelines for incurring business-related expenses, and you must comply with expense-reimbursement procedures.

First Interstate offers corporate credit cards for employees who travel frequently for their duties, purchase large volumes of goods for use by the Company, or incur frequent business expenses that can be paid by credit card. If you have a corporate credit card, you may use it for business-related

expenses only. The only exception is for incidental personal expenses you may incur in the course of business, where it's not practical for you to pay those expenses separately.

You must pay personal expenses in full when they are due. You must submit your business expenses in a timely manner and ensure your corporate card payments are up to date.

The following activities may result in termination of your corporate credit card privileges and/or disciplinary action, up to and including termination:

- Misusing your card;
- Falsifying business expenses;
- Not submitting expenses in a timely manner;
- Paying late repeatedly; or
- Using your card for personal use.

If your employment ends, you must pay any outstanding corporate card balance immediately. When permissible, First Interstate will apply any outstanding expense reimbursement to your outstanding corporate credit card balance.

Q&A

AS LONG AS I PAY OFF MY CORPORATE CREDIT CARD EACH MONTH, IS IT OK IF I OCCASIONALLY USE THE CARD FOR PERSONAL PURCHASES OR CASH ADVANCES?

No. Use your personal credit card for personal expenses or cash advances.

TO LEARN MORE: [Expense Policy](#)



Prohibited Account Transactions

You must handle account transactions according to First Interstate policies and procedures. Examples of inappropriate transactions include:

- Misappropriating funds;
- Opening, closing, or altering accounts without proper authorization;
- Transferring cash from branch to branch without Financial Crimes' approval, whether you use personal accounts or branch funds; and
- Performing any transaction in a manner that doesn't comply with our policies and procedures.

You may not approve or process any transactions (including paperless or online transactions) for your personal accounts, the accounts of immediate family members, or accounts in which you have a personal financial interest or on which you're an authorized signer.

You're also responsible for knowing about and complying with other business-line specific restrictions.

PROTECT FIRST INTERSTATE ASSETS

Our assets include everything that our Company owns or uses to conduct business. They also include our brand, which is one of our most valuable assets.

Each of us is entrusted with the care of these assets, so be protective in safeguarding them from loss, damage, theft, waste, and improper use.

Company Resources

First Interstate resources include equipment, facilities, information technology, financial assets, intellectual property, and other resources. Occasional personal use of assets such as phones, computers, email, and the internet is permitted, but make sure your use doesn't interfere with work (yours or anyone else's) and doesn't violate our policies or the law.

Be aware that anything you write, send, download, or store on our systems is Company property, and we may monitor your use—you shouldn't have any expectation of privacy when using our systems.

You're also responsible for knowing about and complying with any other restrictions or controls your business line may have on using Company resources, including using personal devices at work or for First Interstate business.

TO LEARN MORE:

[Acceptable Use Policy](#)

DID YOU KNOW?

You must return Company resources at the request of First Interstate or when your employment ends.

Q&A

SOMETIMES I NEED TO EXCHANGE EMAILS WITH MY CHILD'S SCHOOL. IS IT OK TO USE COMPANY EMAIL?

Yes, if you do so only once in a while. If you're not sure, check with your manager.

Intellectual Property

While you're working at First Interstate, you may produce, develop, and have access to intellectual property.

Intellectual property produced or developed by employees on Company time or using Company resources is the property of First Interstate. You must comply with all laws protecting intellectual property, including copyright

and trade secret laws. You must also protect the intellectual property of First Interstate from unauthorized use and disclosure, and you may not use it for personal gain. In addition, as a condition of your employment, you agree to assign to First Interstate, exclusively, all rights, titles, and interest in any such First Interstate property, and you must assist First Interstate in obtaining intellectual property rights (e.g., trademarks, patents, and copyrights) for intellectual property developed while you're employed at First Interstate.

We respect the intellectual property rights of others. Employees must not obtain or use the intellectual property of others in violation of confidentiality obligations or law. The use, sale, or other distribution of intellectual property in violation of license agreements or intellectual property laws is prohibited.

Business Communications and Records

Your oral and written business communications must comply with our ethical standards and policies. What you say, write, and do should:

- Be professional;
- Reflect a clear understanding of our core values and expectations;
- Exercise sound judgment; and
- Be clear, truthful, accurate, and respectful.

This policy applies to all internal and external business communications, including, but not limited to, informal notes and memos, email, telephone conversations, and internal social networking sites and collaboration tools.

TO LEARN MORE:

[Phone Etiquette and Scripts](#)

External Communications

At First Interstate, we make sure that information shared about our Company is consistent, accurate, and complete.

In order to ensure that accurate and complete information is conveyed to the public, to regulatory authorities, and to others, we have designated individuals to serve as our official Company spokespersons. Unless you are specifically authorized by the Company's Chief Executive Officer or Chief Financial Officer, to do so, do not make any public statements on First Interstate's behalf.

TO LEARN MORE:

[Social Media Policy](#)

[Investor Relations Disclosure Policy](#)

[External Communications Policy](#)

Q&A

I WAS CONTACTED BY THE MEDIA ABOUT A RUMORED ACQUISITION. I HAVE HEARD DISCUSSIONS IN THE OFFICE ABOUT THE DEAL, AND PASSING ALONG WHAT I HAVE HEARD MIGHT BOOST OUR COMPANY'S STOCK PRICE. IS IT A GOOD IDEA TO TELL THE REPORTER WHAT I KNOW?

No. Unless you are an official spokesperson for First Interstate, do not comment on the rumor. The information you have may be incorrect or incomplete or could even constitute material inside information and is best addressed by an official Company spokesperson.

- Refer all requests for financial information to the Investor Relations Officer.
- Refer all media inquiries and public requests for information to MARCOM.
- Refer all public requests for information and inquiries from government and regulatory agencies to the Legal Department.
- When using social media:
 - Clearly state that any opinions you express about our Company are your own and do not reflect those of our Company.
 - Don't disclose confidential information about our Company or any of our clients or business partners.
 - Don't post anything that's confidential business information, discriminatory, or would constitute a threat, intimidations, harassment, or bullying.

Our Communities

SUPPORTING OUR COMMUNITIES

At First Interstate, we are committed to our communities by helping them become better places to live and work. We invest time and resources to make a difference every day—it's how we deepen our connections and strengthen our relationships.

As a company, we are committed to partnerships that promote social and economic development, and we are passionate about initiatives that benefit our people and the neighborhoods where we live and work. You're encouraged to participate, on a corporate level, in one or more of the many initiatives First Interstate supports through our philanthropic partnerships.

We also encourage employees to make a difference on a personal level. We support your involvement in charitable and political activities on a volunteer basis, but in general, ask that you do so on your own time and at your own

expense, making sure your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use or donate Company funds or assets to further your personal volunteer activities.

First Interstate offers Company-wide programs and benefits such as employee gift/volunteer matching, and First Relief, First Interstate's employee emergency fund.

First Interstate does not make political contributions and will not reimburse you for your contributions to federal, state, or local candidates.

TO LEARN MORE:

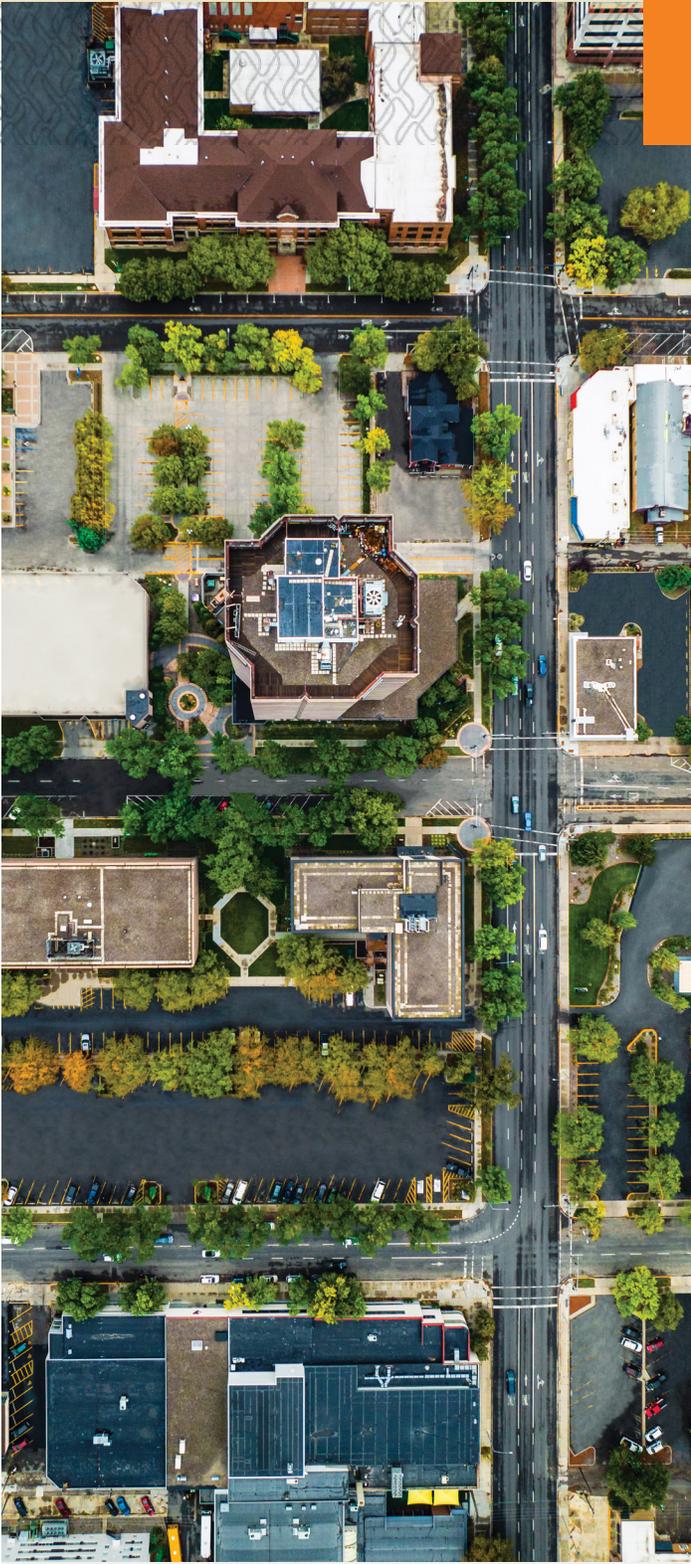
[First Interstate Community Responsibility & Foundation](#)

Considering Our Environment

We're committed to continuously improving our business practices and reducing our environmental impact. We also create opportunities for our employees, clients, and communities to do the same. Our continuous improvement approach to protecting and conserving our natural resources includes:

- Developing less resource-intensive business practices;
- Investing in environmentally beneficial business opportunities;
- Embracing opportunities for financial products and services that incorporate features or benefits for reduced environmental impact; and
- Engaging and educating our employees and clients.





One First Interstate

When we talk about being “One First Interstate,” we mean working with our colleagues and business partners to hold firm to our values and to hold each other accountable to the highest standards of integrity. We’re in this together—collaborating and supporting each other for the good of our employees, clients, communities, and shareholders is how we succeed.

Use our Code of Conduct to help you make the right decisions and choose behaviors that are consistent with our core values. And remember: speak up. Accept nothing less than the highest ethical conduct from yourself and everyone at First Interstate.

If you have questions about our Code of Conduct, please contact a member of the Legal Department, management, or one of the resources on [page 7](#).

Any amendment to our Code of Conduct for executive officers or directors may only be granted by the Board of Directors, or a committee of the Board, and will be publicly disclosed, when required by law. We reserve the right to make unilateral changes to our Code of Conduct or Company policies at any time.

First Interstate supports employees’ rights to speak out publicly about matters of public concern or engage in activities related to the terms and conditions of their employment. This includes, for example, discussion of wages and other terms and conditions of employment, such as our employment-related policies and practices. Nothing in this Code or in any of our policies is intended to limit or interfere with nonsupervisory employees’ rights to engage in concerted activities protected under Section 7 of the National Labor Standards Act.



[firstinterstate.com](https://www.firstinterstate.com)