BankUnited

CODE OF CONDUCT

Ratified by the Board of Directors on November 18, 2026

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I. INTRODUCTION

This Code of Conduct (the "Code") outlines the key principles of professional conduct and ethical standards that guide the employees of BankUnited, Inc. and all subsidiaries and affiliates (collectively, "BankUnited", the "Company" or "we") to maintain the highest standards of conduct and compliance with all federal, state and local laws and regulations.

II. SCOPE, ADMINISTRATION AND GENERAL STANDARDS

We are committed to full compliance with laws and regulations and expect our actions to reflect integrity and professionalism in our activities and interactions with our customers, employees and the communities we serve. This Code embodies not only legal and regulatory requirements, but also the standards of conduct representing our core values. Capitalized terms have the meanings set forth in the Glossary of Terms on page 18.

The Code applies to all directors, officers, employees, agents (including consultants and contractors) and temporary help of the Company (collectively, "Representatives"). Each of the Representatives is referred to as "you" in the Code. This Code provides the framework for ensuring that your conduct is consistent with our corporate, legal and ethical responsibilities.

The Code cannot anticipate or provide for all circumstances of inappropriate conduct. The Company reserves the right to determine the inappropriateness of any conduct engaged in by you, which will include any conduct that is detrimental to: (1) the business interests of the Company, (2) the interests of Company customers, (3) the image of the Company in the community, or (4) the working relationships among Representatives.

The Code should be read and understood in conjunction with the Company's policies, governing documents, including the Employee Handbook, the Insider Trading Policy and other Corporate Management Policies, which are accessible to all employees on the BankUnited SharePoint at Corporate Governance.

The Company reserves the right to determine the action to be taken with regard to any conduct by you that it deems inappropriate, depending on the gravity of the offense and circumstances surrounding it, up to and including termination of employment or position.

What You Can Expect From the Company

The Company pledges fair treatment to you by:

- Providing equal employment opportunities to all.
- Basing selection and promotions on demonstrated ability, skills and qualifications
- Creating and maintaining an environment based on mutual respect, professionalism and collaboration.

What the Company Expects From You

We do not condone a hostile work environment that may involve harassing, inappropriate, unethical, or bullying behaviors.

You will be responsible for:

- Knowing and adhering to the spirit and provisions of this Code.
- Avoiding illegal conduct in both business and personal matters.
- Complying with all applicable governmental laws, rules, regulations and guidelines and all applicable Company policies, procedures and internal controls.
- Promptly reporting all violations of this Code to your immediate supervisor (who shall report each violation to his or her supervisor as appropriate), Office of the General Counsel or Human Resources.
- Acting ethically and professionally, with the best interest of the Company in mind, and only as duly authorized by the Company.
- Avoiding conduct that could potentially harm the Company's clients, customers, or employees.
- Responding honestly and candidly when dealing with the Company's independent and internal auditors, examiners and other regulators, attorneys and compliance staff.

Corrective Action

Failure to comply with the Code, or with the laws and regulations applicable to the Company's business, may result in disciplinary action, up to and including termination. Corrective action may be taken for:

- Deliberately withholding relevant information or knowingly providing false information concerning a violation of the Code or applicable laws or regulations.
- Retaliating, directly or indirectly, against a Representative for (a) reporting a suspected violation of this Code or applicable laws and regulations or (b) assisting in an investigation of a suspected violation.
- Directing others to violate this Code or applicable laws and regulations.

Waivers of Code Requirements

A waiver is an approval of a material departure from a provision of the Code. Any waiver of the requirements of this Code for directors or a member of Executive Management may only be granted by the Board of Directors or an independent committee of the Board of Directors. Waivers of any Code requirements for Representatives, may be granted by a member of Executive Management, in consultation with the General Counsel and the Human Resources Executive, after review of relevant facts and circumstances.

Acknowledgements

The Code may be updated periodically, and changes to the Code will be available to employees promptly thereafter. You should direct questions related to the application of the Code to the Human Resources Department or to the Office of the General Counsel. You will be required to periodically acknowledge electronically that you have read the Code, understand its provisions and agree to abide by them.

III. EMPLOYMENT PRACTICES

Anti-Discrimination and Anti-Harassment

We believe in a workplace where everyone can thrive. You are strictly prohibited from discriminating on the basis of race, color, religion, sex, gender, ethnicity/national origin,

ancestry, citizenship, parental status, age, genetic information, medical conditions, pregnancy, childbirth, political affiliation, military service or other non-merit based factors, status, protected veteran status and any other category protected by federal, state or local laws in recruiting, interviewing, hiring, firing, promoting, training, disciplining, establishing compensation and benefits, salaries and in all terms, conditions and privileges of employment.

We are committed to an environment of mutual respect and professionalism and comply with all national, state and/or local anti-harassment laws, regulations and ordinances. Harassment involving co-workers, customers and/or vendors in any form on the basis of any protected status will not be tolerated in any work-related setting or activity, whether on or off Company's premises. Please refer to the Employee Handbook and the Company's policies for further information on the Company's anti-discrimination and anti-harassment practices and requirements.

Prohibitions and Requirements Regarding Criminal Activity

The Company is restricted by applicable laws and regulations and the provisions of its fidelity bond from employing persons who have committed dishonest acts or have been convicted of crimes involving fraud, dishonesty, breach of trust or similar crimes. Examples of dishonest or fraudulent acts include misappropriation of money or other properties; deliberate misrouting of checks to delay payment; false or misleading entries, records or reports, and check kiting.

If you are charged with a crime involving fraud, dishonesty, breach of trust or similar crimes, you must immediately report this to your immediate supervisor or Human Resources. Individual circumstances will be evaluated to determine what effect, if any, the charges will have on your relationship with the Company. You must also report any behavior by any other Representative that could reasonably be interpreted as fraudulent, criminal or a violation of the Code.

Separation of Closely Related Representatives within Company

To minimize security risks and avoid conflicts of interest, you and your immediate family members or other persons with whom you have a close personal relationship must not work in the same department, and you and such other person must not be placed in positions where either supervises the other, can influence the employment status of the other, or is in a position of processing, tracking, monitoring or recording transactions initiated by the other unless approved by a member of Management.

IV. CONFIDENTIALITY

Confidential Information includes any type of non-public business or personal information with respect to the Company, its customers, prospective customers, suppliers, Representatives, shareholders and other persons or entities. Please refer to the Glossary for more information.

All employees must comply with the Company's policies governing insider trading, confidentiality, ethical conduct, conflicts of interest, and responsible use of Company data and information.

Duty of Confidentiality

Confidential Information acquired in the course of business must be held in strict confidence,

used solely for proper business purposes and must never be disclosed to, discussed with or divulged to unauthorized persons, inside or outside the Company, even if those unauthorized persons are family, friends or acquaintances.

When you leave the Company, you may not retain, divulge or use any Confidential Information. Disclosure of such information without appropriate authorization can result in civil and criminal penalties against you.

Authorization for Disclosure of Confidential Information

If you are authorized to disclose Confidential Information, you should make certain the recipients know that the information is confidential and should not be disclosed by the recipients to other people, unless such recipient is otherwise so authorized. Disclosure of Confidential Information to persons outside the Company, such as service providers, may require a written confidentiality agreement. You should consult with the General Counsel to determine when this may be necessary. The Company occasionally uses temporary workers, contractors and consultants. Special care should be taken to minimize the access of temporary workers, contractors and consultants to any Confidential Information.

Customer Information

Customer Information is a specific type of Confidential Information that is crucial to the Company's business but that is subject to special confidentiality laws and requirements. Customer Information is non-public personal information about a customer or potential customer of the Company.

Disclosure and use of Customer Information is governed by the Company's Privacy Policy. You must comply with this Privacy Policy in conducting all business on behalf of the Company. In general, you may share Customer Information with other Representatives in your business unit and with Representatives in other business units within the Company when sharing will enhance the services the Company can provide to its customers. In all cases, however, such sharing must comply with the Privacy Policy and applicable law. As a general matter, Customer Information is not shared with anyone outside the Company, although there are a few limited exceptions.

Employees are strictly prohibited from unauthorized viewing of the Company's customers or employee accounts. Any impermissible viewing of such accounts will be deemed a material violation of this Code and will be addressed in accordance with the corrective actions described herein.

Please refer to the Privacy Policy for details on the use and disclosure of Customer Information. Before sharing information of any kind related to customers, make sure you are authorized to do so. You should direct any related questions to the Chief Compliance Officer or the General Counsel.

Inside Information

In some instances, the disclosure and use of Confidential Information about a customer or other entity that the Company does business with or is otherwise associated with or about the Company, is subject to the federal securities laws. These laws prohibit those who possess material, nonpublic information about or related to a business entity ("Inside Information") from buying or selling securities of that entity on the basis of the Inside Information, and from "tipping" others

concerning that information. Violation of securities laws regarding Inside Information can carry criminal, as well as civil, penalties.

The securities law restrictions regarding disclosure and use of Inside Information related to the Company's customers, prospective customers, suppliers and other persons or entities, or about the Company's business and strategies, where such information was obtained in the course of employment with, or the performance of services on behalf of, the Company. Information is "nonpublic" if it has not been previously disclosed to and is otherwise not available to the general public. Information about an entity should be regarded as "material" if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of that entity's securities. Whether information is material must be determined by the specific facts in each situation. However, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material.

Prediction Markets, Wagers, and Event Based Trading

Employees are prohibited from using or attempting to use Inside Information or Confidential Information for any personal benefit or gain, whether through traditional securities transactions or any other financial, commercial, gaming, wagering, or event-based activity. Employees may not directly or indirectly purchase, sell, trade, enter into, participate in, or facilitate any prediction market position, event contract, wager, bet, derivative instrument, or similar arrangement using Inside Information or Confidential Information that could affect the value, outcome, settlement, or profitability of the position or activity.

Employees may not participate in prediction markets, place bets, or engage in any form of trading that relies on or could reasonably be perceived as relying on Confidential Information. This includes but is not limited to forecasting platforms, event driven contracts, or any betting activity tied to the Company's business objectives, performance, or strategic outcomes. Further, employees must avoid any conduct related to these activities and transactions that are violations of applicable laws and the Company's policies.

In addition, employees may not participate in any prediction market, event contract, wagering, betting, or similar activity relating to the Company that could reasonably be expected to be affected by material nonpublic information concerning the Company, including but not limited to its customers, strategic initiatives, financial condition, performance, transactions or other business-related events, regardless of whether such activity would constitute a securities transaction under applicable law. This prohibition applies whether the activity is conducted directly or indirectly, including through digital wallets, online platforms, exchanges, gaming applications, or other intermediaries.

Please refer to the Insider Trading Policy for further information on these topics.

V. PUBLIC COMMUNICATIONS AND DISCLOSURES

Unless otherwise authorized to do so, only certain designated Representatives are authorized to speak publicly on behalf of the Company, as outlined in the Company's Media Policy. All public disclosures or media interviews, even if authorized, should be coordinated in advance with the Company's Marketing Department and all media inquiries should be referred to the Marketing Department.

The Company has established a robust framework that seeks to minimize risks associated with social media use and related activities and to ensure compliance with applicable federal, state and local laws. Only authorized designees are allowed to use social media channels on behalf of BankUnited. Any use of social media by employees on behalf of BankUnited must be reviewed and approved by the Marketing Executive. The Company does not condone any activity performed in social media networks by personnel who are not authorized to represent Company. In addition to the Social Media Policy and Program, the Employee Handbook sets forth clear expectations for the use of social media by employees and contractors.

Public testimony in governmental, regulatory, court or other public hearings or proceedings that deal in any way with the Company or its business should be discussed in advance (except as limited by law) with the General Counsel.

You should be extremely careful to avoid unintentional public disclosures of Confidential Information. For example, participation in website chat rooms, bulletin boards, or similar forums involves public disclosure. The Company will require you to sign and adhere to its policies that outline requirements for use of Company assets and restrictions on disclosure of Company data and assets.

VI. COMPANY ASSETS AND RECORDS

Safeguarding Company Assets

You must protect the assets of the Company, as well as the assets of customers in the custody of the Company ("Company Assets"). This duty is required during and after your service with the Company. All property created by you on behalf of the Company, including files, reference materials, reports and databases, belongs to the Company and must be returned to the Company upon termination of service.

Use of Company Assets is for Company business, except where personal use is specifically authorized, and any other use is strictly prohibited. We rely on you to safeguard the Company Assets from theft, loss or waste. Company assets are not to be used for personal gain, and Company funds should not be used for any unlawful or unauthorized purpose. Intentionally damaging, destroying, or disposing of Company property, regardless of value, is a violation of this Code.

Intellectual Property (IP) Owned or Licensed by the Company

Any IP that you develop alone or with others in the context of employment or association with the Company ("Work-Related IP") belongs to the Company, and may include any invention, discovery, development, concept, idea, process or work, written or otherwise, whether or not it can be patented, trademarked or copyrighted, that you developed alone or with others in the context of your employment or service with the Company that is directly or indirectly related to Company business.

The Company uses third-party written materials, software and other multimedia that generally constitutes the third party's IP and are subject to license agreements. Third- party software and other IP must not be copied, transferred or used except as provided in the license agreement with the third party. The absence of a copyright notice does not mean that something is not copyrighted. If you are unsure about the use of third-party trademarks or copyrights on public materials, you should consult the Office of the General Counsel.

Electronic Records and Communications

You must abide by the Company's policies regarding electronic communications and records. Electronic communications and records created by you (computer, Internet, voice mail) will be held to the same standards as all business communications and must comply with the Company's anti-discrimination and anti-harassment policies. You are expected to use good judgment and discretion when using electronic communication systems.

Electronic mail systems provided by the Company are the property of the Company and should be used for business purposes only. In general, the Internet and similar systems represent a valuable research and information sharing tool. They also present a significant opportunity for abuse and diminished employee productivity. Misuses will lead to corrective action up to and including termination of your relationship with the Company. Subject to applicable law, the Company may at any time monitor email and Internet activities by you conducted utilizing BankUnited approved equipment.

Artificial Intelligence

The Company recognizes that Artificial Intelligence ("AI"), including generative AI tools, may be developed and used to enhance productivity, efficiency, and lead to innovation. Employees must use AI tools responsibly, for legitimate business purposes and in compliance with applicable laws, regulations and the Company policies.

Employees are prohibited from using AI tools in a manner that violates applicable laws, regulations, intellectual property rights, Company policies, or contractual obligations. Confidential Information uploaded into any AI system not approved by the Company must be expressly authorized by the Company. Employees must also adhere to the Company's security controls and approved processes and standards related to AI adoption and use.

The Company reserves the right to monitor, restrict, approve, or prohibit the use of specific AI tools and platforms.

Financial Internal Controls and Recordkeeping

The Company has adopted certain internal controls to provide full and accurate disclosure of the Company's financial performance. You are expected to maintain and comply with these controls and policies.

You may not knowingly make a false entry in any financial record or account of the Company or help anyone else do so. If you are responsible for creating or maintaining any financial records of the Company, you are expected to make sure that the records are accurate, complete and timely. The records must comply with all laws and be prepared in accordance with generally accepted accounting principles ("GAAP"). All Representatives must make sure Company business expenses are accurately reported according to Company guidelines.

Records Retention

The Company maintains records retention practices that are in compliance with applicable laws and regulations, and the Company's policies. Specific retention requests may be made by the Office of the General Counsel, or law enforcement authorities. Employees must strictly adhere

to the requirements specified in our retention policies and practices. Questions should be directed to the Office of the General Counsel.

VII. CONFLICTS OF INTEREST

General Requirements

Conflicts of interest may arise when you or your family transact business with the Company or in connection with your business or personal relationships with customers, suppliers, competitors, or other Representatives of the Company. The Company requires you to conduct yourself in an honest and ethical manner to avoid actual or apparent conflicts of interest with the Company. You should not:

- Use your position to profit personally, directly or indirectly, at the expense of the Company.
- Solicit or accept any preferential treatment from the Company for you or your family.
- Accept any engagement, either in your individual capacity or through any business or entity that you own or control, to provide goods or services to the Company outside of performance of your employment duties.
- Engage in any transaction that would give the appearance of a conflict of interest, preferential treatment or usurpation of corporate opportunity.
- Use your position to solicit preferential treatment for any business with which you are associated.

If you have any question whether an activity might violate or appear to violate this policy regarding conflicts of interest, you must seek guidance from your immediate supervisor or Office of the General Counsel. You must disclose any potential or actual conflict of interest to your immediate supervisor.

Acting for the Company in a Conflict Transaction

Generally, if the Company is involved in any transaction (for example, a loan) with an individual who is related to you or is a personal friend of yours or with any business in which you have a personal interest, you cannot represent or make decisions for the Company in that transaction. The same is true if the transaction is between the Company and you, individually.

For purposes of the Code, you will be treated as having a personal interest in a business if you are an executive officer or director of that business or if you have a significant financial Interest in that business (defined as a 5% or greater equity ownership interest) whether that interest is voting or non-voting. In determining the financial interest in a business enterprise, you should aggregate your financial interest with the financial interest of each other “Family Member” and the financial interest of each other Significant Financial Interest of you and your Family Members. The term Family Member is defined in the Employee Handbook.

Negotiating with the Company in a Conflict Transaction

In any conflict-of-interest transaction, you should not negotiate with the Company on your own behalf or on behalf of your relatives or friends, or any business in which you have a personal interest. Such negotiating creates a risk or appearance that you may be using your position with the Company to secure more favorable terms than would otherwise be given.

Insider Borrowing from the Company – Regulation O

Borrowings by directors, officers and their related businesses from the Company are subject to a number of laws and regulations, including Regulation O, and may be subject to restrictions on both amount and terms. All directors and officers are required to comply with the applicable legal restrictions on these borrowings, including obtaining approval from the Board of Directors when required. Please refer to the Insider Lending/Regulation O Policy for compliance and requirements. Questions about insider lending and Regulation O should be addressed to the Chief Credit Officer or the General Counsel.

Investments in Customers, Suppliers and Competitors

Unless you have obtained prior approval by a member of Management and after consultation with the General Counsel, neither you nor any of your Family Members may:

- Invest directly or indirectly in the equity of a customer, supplier or competitor of the Company, other than the securities of a publicly traded company, or
- Engage, directly or indirectly, in business ventures with the Company's competitors.

You must disclose ownership of more than five percent (5%) of any class of securities in a publicly traded company to a member of Management.

Lending or Borrowing from Customers, Suppliers and Other Representatives

You may not lend to or borrow money from other Representatives, customers, or suppliers of the Company, other than recognized lending institutions. This restriction does not preclude the normal extension of credit resulting from making a purchase from a provider of products and services and charging it to an account.

Giving Advice to Customers

In many cases, discussions with customers lead to a request that you make statements, which may relate to the legality or illegality of a proposed transaction. You should refrain from appearing to give legal advice to customers. If you are in doubt, you should contact the General Counsel or recommend to the customer that he/she refers the matter in question to the customer's personal attorney.

Corporate Opportunity

You have a responsibility to promote the Company's business when the opportunity arises. You may not personally benefit when a business opportunity arises if your benefiting means the Company cannot benefit from the opportunity. Moreover, you cannot, during your term of employment or service, enter into an activity which directly competes with the Company without the approval of a member of Management, after consultation with the General Counsel.

For example, except as expressly authorized, you cannot:

- During your term of service or employment, solicit a customer or potential customer away from the Company to a competitor of the Company; or

- During your term of service or employment and for a period of one (1) year thereafter, solicit any employee or agent of the Company to leave the Company for any other business, whether a competitor or otherwise.

The provisions of this section of the Code and any subsequent acknowledgement of the Code shall not be deemed to amend, supersede, terminate or otherwise limit the terms of any written agreement between you and any entity within the Company.

Outside Employment and Activities

All Representatives should avoid any action or activity that conflicts or gives the appearance of a conflict with the Company's interest. A conflict of interest may arise when a person's private activities interfere with the interests of the Company. Acceptance of outside employment, outside speaking engagements, election to the board of directors of other organizations, representation of Company customers in dealings with the Company, and participation in activities on behalf of outside organizations may represent potential conflicts of interest.

The Company encourages you to take an active role and/or interest in the issues in the community and to participate in worthwhile civic, social, educational, and charitable organizations and activities, subject to the restrictions in this section. You should remember, however, that your own personal civic and political activities, contributions, and interests represent your own views, not those of the Company. You should not use the Company's name or property for civic, political, or individual purposes without prior consent from the Office of the General Counsel.

Full-time employees must disclose and obtain approval for all outside employment to their immediate supervisor prior to engaging in outside employment. However, you must not engage in outside employment that interferes with the time and attention that must be devoted to your duties at the Company or adversely affects the quality of the work you perform. Outside employment must not compete or conflict with the activities of the Company, involve any use of Company equipment, supplies, or facilities, imply Company sponsorship, or support, or adversely affect the Company's reputation.

Officers and directors of the Company must obtain prior written approval from the Board of Directors prior to serving as a director, officer or employee of any business entity that transacts business with the Company.

Personal Finance Issues

As a Representative of the Company, your personal financial conduct reflects on our professional reputation and your own job performance. You are expected to manage your finances responsibly and avoid situations that lead to credit overextension, wage garnishments, or bounced checks. Please ensure your accounts are maintained properly; remember that you are also responsible for any actions taken by co-signers on your accounts. All employees must adhere to Company policies regarding personal financial management.

VIII. RESTRICTIONS ON GIFTS, CONTRIBUTIONS AND PAYMENTS

Gifts

Gifts from existing or potential customers or suppliers of the Company may create questions of

business ethics. A conflict of interest may arise when you receive gifts from clients, potential clients or third parties who are engaged by the Company. A “gift” includes anything of value for which the recipient is not required or expected to pay the retail or usual and customary cost. Gifts can be from your family members or friends or businesses in which those family or friends have interests. Gifts may include any type of cash, cash equivalent, goods or services, meals, refreshments, use of accommodations or vacation home, gratuity, favor, preferential treatment, discount or price concession, loan, legacy, fee, compensation or anything of monetary value including trips, entertainment and tickets for sporting events. Gifts to your Family Members or your Significant Financial Interests generally will be treated as gifts to you.

The Company recognizes that there are certain situations in which no harm is done or potential conflict created by the acceptance of gifts when there is no corrupt intent or reasonable inference that the gift could influence the performance or decision making of the employee. You must always ensure that any exchange of gifts is reasonable, infrequent and consistent with lawful business practices and customs. You may accept or give a gift if it is based on a personal relationship that exists independently of any Company business. On a case-by-case basis, the Company may approve circumstances in which you may accept something of value in connection with Company business. Approval may be given by a member of Management, after consultation with the General Counsel, and shall be based on a full written disclosure of all relevant facts submitted by you.

Business Entertainment

Beyond the standard guidelines, you may accept or provide business entertainment—such as meals and refreshments—only if it is a common industry practice and the cost is reasonable and customary. The primary intent must be to discuss business or build professional relationships. Any entertainment hosted by a third party should be appropriate for your role and never lavish or extravagant. Furthermore, you must obtain prior approval from your immediate supervisor, before allowing a customer or vendor to pay for travel or lodging, unless the provider is a personal friend or family member whose relationship exists independently of your work at the Company.

You are required to report to your immediate supervisor any gift received that does not fall clearly within a permissible or approved gift under the Company’s policies. You must also report to the Office of the General Counsel and a member of Management any offer of a gift received because of your relationship with the Company that may constitute a bribe or improper solicitation or inducement. In the event you receive a gift that is prohibited, you should return the gift to the donor with an explanation. If return is impossible, it is your responsibility to consult with a member of Management and the Office of the General Counsel regarding proper disposition.

Representatives Providing Gifts

Personal gifts are generally permitted, even if those parties also happen to be Company customers or suppliers, unless such gifts are prohibited by law. A “personal gift” is any gift that is not Company property, is not purchased using Company funds, and will not be perceived by the recipient as given by the Company to secure the recipient’s business. To facilitate compliance with applicable law, the Company discourages personal gift giving in those situations where the Company has actual or potential business dealings with the recipient, or where the recipient’s decision to do business with the Company may be influenced by the gift even if that is not the intent.

Gifts made by you on behalf of the Company to any existing or potential customers or supplier using Company funds or assets must comply with Internal Revenue Code standards related to corporate gift giving and must be approved by the Chief Accounting Officer. Any Company gift that exceeds $150 in value must have the approval of a member of Management and be in compliance with the Company's accepted practices.

Federal and state laws prohibit bribes, kickbacks or similar payments given to any persons or organizations (or their agents) to get their business.

Bank Bribery Act

The Bank Bribery Act (BBA) prohibits Representatives from soliciting for themselves or for a third party anything of value from anyone in return for any business, service or Company's confidential information, and from accepting anything of value from anyone in connection with Company's business either before or after a transaction is discussed or consummated. Violations can result in felony or misdemeanor charges, with significant penalties.

Bribery of Public Officials

Various laws exist limiting and generally prohibiting the giving of gifts (such as meals, entertainment, lodging and gift items) to public officials. In no instance should you offer or give a benefit to a public official, either directly or through a third party, if this action is intended, or might in any way be construed to be intended, to influence the decisions of the public official in his or her official capacity, to reward the public official for a decision already made or to take advantage of his or her position. Generally speaking, a "benefit" may include, for example, items such as gifts, payments, favors and other types of special treatment or consideration.

You should interpret these prohibitions broadly and conduct your relations with public officials in a manner that does not raise even an appearance of impropriety. Should you have any questions or concerns regarding your dealings with a public official you should immediately contact the Human Resource Department or the Office of the General Counsel.

Political Contributions and Transactions

In addition, federal, state and local law restricts the Company with regard to making political contributions or paying political expenditures in certain circumstances. Furthermore, federal, state and local law restricts loans made by the Company to political candidates or committees. Questions regarding these matters should be addressed to the Office of the General Counsel.

Foreign Corrupt Practices Act

If you are conducting business on behalf of the Company in foreign markets, you must be familiar with the prohibitions of the Foreign Corrupt Practices Act (FCPA), as amended, and the Company's FCPA Policy. In general, this federal law prohibits corrupt payments to foreign officials for the purpose of obtaining or keeping business. Questions regarding foreign business activity of the FCPA should be addressed to the Office of the General Counsel.

IX. FAIR DEALING

The Company depends on its reputation for quality, service and integrity. Each Representative should endeavor to deal fairly with the Company's customers, suppliers, competitors and other Representatives. The Company prohibits employees from taking unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. You must abide by these provisions and exercise good judgment and care in all business activities.

The Company has adopted a BSA/AML/OFAC Policy and Program that establishes standards, procedures and controls that ensure compliance with the Bank Secrecy Act (BSA), anti-money laundering (AML) laws and regulations, and the requirements issued by the U.S. Department of the Treasury's Office of Foreign Asset Control (OFAC). Employees must comply with BSA/AML/OFAC Policy and Program which are available on the BankUnited SharePoint at Financial Crimes Compliance.

Antitrust Laws

All Company efforts in the marketplace must be conducted in accordance with all applicable antitrust and competition laws. Antitrust and competition laws are complex and cannot be fully described in any code of business conduct. This Code will give you an overview of some types of conduct that are particularly likely to raise antitrust concerns. Because the consequences, both personal and corporate, of violating the antitrust laws are so severe, if you become aware or are asked to engage in activities prohibited by the antitrust laws, you should immediately consult the Office of the General Counsel for further guidance.

Conspiracies and Collaborations Among Competitors

One of the primary goals of the antitrust laws is to promote and preserve each competitor's independence when making decisions on price, rates, terms, output, and other competitively sensitive factors. Some of the most serious antitrust offenses are agreements between competitors that limit independent judgment and restrain trade, such as agreements to fix prices, rates or terms, restrict output or control the quality of products, or to divide a market for customers, territories, products or purchases. The exchange of sensitive information with competitors regarding topics such as prices, rates, terms, profit margins, output levels, or billing or advertising practices can potentially violate antitrust and competition laws.

Agreements that may be deemed in violation of antitrust laws include written and oral agreements. Any communication with a competitor's representative, no matter how innocuous it may seem at the time, may later be subject to legal scrutiny and form the basis for accusations of improper or illegal conduct. You should take care to avoid involving yourself in situations from which an unlawful agreement could be inferred.

Joint ventures with competitors are not illegal under applicable antitrust and competition laws. However, joint ventures may present potential antitrust concerns. You should consult the Office of the General Counsel before negotiating or entering into any such venture.

Relationships with Customers and Suppliers

Relationships with customers and suppliers can also be subject to antitrust prohibitions if these relationships harm competition. For example, illegal activity may include, but is not limited to:

- Entering into formal or informal agreements, whether written or oral, with competitors

regarding boycotting or refusing to deal with certain suppliers, vendors or customers (unless required by a law or governing body, such as the Office of Foreign Assets Control).

- Making the use of a product or service from a supplier or vendor conditional upon their use of our services or products and "tying" arrangements (also a regulatory compliance concern) where, for example, a customer or supplier is required, as a condition of purchasing one product, to purchase a second, distinct product. While a company generally is allowed to decide independently that it does not wish to buy from or sell to a particular person, when such a decision is reached jointly with others, it may be unlawful, regardless of whether it seems commercially reasonable.

Penalties

Failure to comply with the antitrust laws could result in criminal prosecution for Representatives and large criminal fines and other monetary penalties for both the Company and Representatives. In addition, private parties may bring civil suits to recover three times their actual damages, plus attorney's fees and court costs.

The antitrust laws are extremely complex. Because antitrust lawsuits can be very costly, even when a company has not violated the antitrust laws and is ultimately cleared, it is important to consult with the General Counsel before engaging in any conduct that even appears to create the basis for an allegation of wrongdoing.

It is entirely proper for us to gather information about our marketplace, including information about our competitors and their products and services. However, there are limits to the ways that information should be acquired and used, especially information about competitors. In gathering competitive information, you should abide by the following guidelines:

We may gather information about our competitors from sources such as published articles, advertisements, brochures, other non-proprietary materials, surveys by consultants and conversations with our customers, as long as those conversations are not likely to suggest that we are attempting to (a) conspire with our competitors or (b) gather information in breach of a customer's or consultant's nondisclosure agreement with a competitor or through other wrongful means. You should not contact a competitor directly or gather information about its competitive products, or its terms or conditions of sale. You should be able to identify the source of any information about competitors. We must never attempt to acquire a competitor's trade secrets or other proprietary information through unlawful means, such as theft, spying, bribery or breach of a competitor's nondisclosure agreement.

If there is any indication that information that you obtain was not lawfully received by the party in possession, you should refuse to accept it. If you receive any competitive information anonymously or that is marked confidential, you should not review it and should contact the Office of General Counsel immediately.

The improper gathering or use of competitive information could subject you and the Company to criminal and civil liability. When in doubt as to whether a source of information is proper, you should contact the Office of the General Counsel.

X. COMPLIANCE WITH REGULATIONS AND POLICIES

We are strongly committed to a culture of compliance and have adopted corporate management

policies that incorporate applicable legal and regulatory requirements. Ethics and integrity are foundational to our strong corporate governance and critical to its reputation and success. A strong culture of ethics and integrity is established and actively supported by Management. All employees are expected to adhere to ethical standards and be compliant with the Company's policies and all applicable laws and regulations

You must comply with the spirit and provisions of this Code, all applicable governmental laws, rules, regulations and guidelines and all applicable Company policies, procedures and internal controls. If a law is deemed to conflict with any provisions of this Code, you must comply with the law. Any questions about potential conflicts must be addressed to the Office of the General Counsel.

Ultimate responsibility to ensure that we as a Company comply with the many laws, regulations and ethical standards affecting our business rests with each of us. Each employee is responsible for being familiar with applicable laws and regulations and the Company's policies. We encourage and provide open communications, training and other activities to ensure that employees are familiar with applicable laws, regulations and policies.

Compliance with Consumer Laws

We support a consumer-centric culture that centers around compliance with consumer protection laws and regulations. The Company has incorporated principles and requirements of Equal Credit Opportunity Act (ECOA), Fair Housing Act (FHA), Home Mortgage Disclosure Act (HMDA), Community Reinvestment Act (CRA), Fair Lending and Unfair, Deceptive or Abusive Acts or Practices (UDAAP) into its policies and practices. Each Representative shall endeavor to treat our customers in a fair and consistent manner, abide by this Code, our policies, programs, and exercise good judgment and care in all business activities.

Failure to comply with the consumer protection laws could result in legal, regulatory and reputational risk to the Company. In addition, all fair lending and consumer protection laws and regulations are subject to review by banking regulators, principally the Consumer Financial Protection Bureau (CFPB), as well as the Office of the Comptroller of the Currency (OCC).

Compliance with Securities Laws and Accounting Standards

We are committed to compliance with applicable securities laws, rules, and regulations, accounting standards and internal accounting controls. You are expected to report any complaints or concerns regarding accounting, internal accounting controls and auditing matters ("Accounting Matters") promptly. Reports may be made to the Office of General Counsel, Internal Audit or the Audit Committee Chairperson. All reports will be treated confidentially to the extent reasonably possible. No one will be subject to retaliation because of a good faith report of a complaint or concern regarding Accounting Matters.

XI. IMPLEMENTATION OF THE CODE

Seeking Guidance

This Code cannot provide definitive answers to all questions. You have the expectation and responsibility to act in an ethical and professional manner. If you have questions regarding any of the policies discussed in this Code or if you are in doubt about the best course of action in a particular situation, you should seek guidance from your supervisor, Human Resources

Department, or the Office of the General Counsel.

Reporting Violations

If you know of or suspect a violation of applicable laws or regulations, the Code, or the Company's related policies, you must immediately report that information to the General Counsel or the Company's ethics hotline, discussed below.

Confidentiality and Policy Against Retaliation

To the extent possible, we will endeavor to keep confidential the identity of anyone reporting a violation of this Code. You will be treated with dignity and respect. Your concerns will be addressed, and you will be informed of the outcome. We will also keep the identities of employees about whom allegations of violations are brought confidential, unless and until it is established that a violation has occurred.

We encourage any employee to report such conduct openly, if desired, or anonymously, without fear of retaliation. The Company will not discipline, discriminate against or retaliate against any employee who reports such conduct, unless it is determined that the report was made with knowledge that it was false, or who cooperates in any investigation or inquiry regarding such conduct. No one will be subject to retaliation because of a good faith report of a complaint or concern regarding such matters.

Reports Regarding Accounting Matters

We are committed to compliance with applicable securities laws, rules, and regulations, accounting standards and internal accounting controls. You are expected to report any complaints or concerns regarding accounting, internal accounting controls and auditing matters ("Accounting Matters") promptly. Reports may be made to the General Counsel or the Audit Committee Chairperson either in person or by telephone, as discussed below. All reports will be treated confidentially to the extent reasonably possible. No one will be subject to retaliation because of a good faith report of a complaint or concern regarding Accounting Matters.

The Ethics Hotline

We maintain a 24-hour hotline, 1-877-801-7755, which you can use to report suspected violations of the Code, accounting audit or internal accounting control matters. You may report suspected violations anonymously; however, providing your name may expedite the time it takes the Company to respond to your call, and it also allows the Company to contact you, if necessary, during any investigation. Either way, you should treat the information that you provide as confidential.

Investigations of Suspected Violations

All reported violations will be promptly investigated and treated confidentially to the extent reasonably possible. It is imperative that reporting persons not conduct their own preliminary investigations. Investigations of alleged violations may involve complex legal issues and acting on your own may compromise the integrity of an investigation and adversely affect both you and the Company. You must cooperate in any investigation by the Company or law enforcement agencies.

Discipline for Violations

The Company intends to use every reasonable effort to prevent the occurrence of conduct not in compliance with its Code and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Subject to applicable law and agreements, Company personnel who violate this Code and other Company policies and procedures may be subject to disciplinary action, up to and including dismissal.

No Rights Created

This Code is a statement of the fundamental principles and key policies and procedures that govern the conduct of the Company's business. It is not intended to and does not create any obligations to or rights in any employee, director, customer, supplier, competitor, stockholder or any other person or entity.

XII. GLOSSARY OF TERMS

Below are select definitions of terms used in the Code of Conduct:

Bank – BankUnited, N.A., a national banking association and the operating subsidiary of the holding company. The terms Bank or Company may be used interchangeably in this document.

Board – the Board of Directors of the Company.

Confidentiality – includes any type of non-public business or personal information with respect to the Company, its customers, prospective customers, suppliers, Representatives, shareholders and other persons or entities. Confidential Information may include, but is not limited to:

- Security and business practices or processes, policies and procedures
- Non-public portions of bank examination reports and other reports filed with the Company's regulators
- Employee compensation, health, and personnel records
- Software, data processing programs, and databases
- Customer and supplier lists, telephone and other contact lists
- Information about employees of customers or suppliers
- Cost, pricing and financial information
- Business and marketing plans
- Information posted on the Company's internal website

Company – Includes both BankUnited, Inc., as the holding company, and BankUnited, N.A., a national banking association and the operating subsidiary of the holding company. The terms Bank or Company may be used interchangeably in this document.

Company Assets - Include all property created, obtained, or compiled by or on behalf of, the Company, including but not limited to:

- Financial assets such as cash and securities
- Physical assets such as furnishings, equipment and supplies

- Customer and other business relationships, customer lists and customer files
- Intellectual property, and computer software, data processing systems, computer programs, and databases, such as Work-Related IP (defined below)
- Information about products and services, such as cost, pricing or financial information
- Services, such as telephone services and Intranet and Internet access
- Reference materials and reports
- Security and other business practices or processes, policies and procedures
- Employee compensation, health, or personnel records
- Financial records and business or marketing plans
- Any other information that the Company considers to be proprietary or confidential

Customer Information - a specific type of Confidential Information that is crucial to the Company's business but that is subject to special confidentiality laws and requirements. Customer Information is non-public personal information about a customer or potential customer of the Company. Examples of Customer Information include, but are not limited to:

- The same kind of information the Company considers confidential about itself
- Information obtained from requests for our products or services or as a result of "know your customer" due diligence, such as social security number, birth date, address or information disclosed in a loan application
- Information about transactions with the Company, such as account balances and loan balances
- Information obtained from consumer credit reporting agencies, such as a
- person's credit history
- Any assessment of a customer's or potential customer's creditworthiness, financial condition or suitability for a product or service

Executive Management – includes the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Operating Officer (COO) and the Chief Risk Officer (CRO).

Management – refers to the Company's executive and senior management.

Representatives – refers to all directors, officers, employees, agents (including consultants and contractors) and temporary help of the Company

Senior management – refers to the Company's employees in managerial or other roles that are responsible for making key decisions related to their business or functional units and implementing the Company's business goals, and strategies in accordance with the Company's policies and procedures. Senior management is a term used in the Company's policies and program; it can be used as a stand- alone term or be included in the broader term 'Management.'

XIII. DOCUMENT MANAGEMENT

Responsible Department: Human Resources

Business Contact — Human Resources Executive

Approval Details:

Nominating and Corporate Governance Committee	November 17, 2026
Board of Directors	November 18, 2026

Revision History:

Date	Version	Author
February 13, 2026	2026-1	Alina Pastiu, Anabel Nemrow
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