

EQUITY BANCSHARES, INC.

Board of Directors Conflicts of Interest Policy

Effective date December 15, 2022

I. INTRODUCTION

The Board of Directors (the “Board”) of Equity Bancshares, Inc. (“EBI”) and Equity Bank (“Equity”) have approved and adopted the following Conflict of Interest Policy (the “Policy”). The Policy is intended to provide principles and guidelines for the business practices of the Boards of Directors of EBI and Equity in their relationship with EBI and Equity consistent with applicable laws, regulations and guidance’s from Banking agencies.

The provisions set forth in this policy shall also apply to any member of a Director’s family (including spouse, parents, children, siblings or other immediate relatives). Directors are required to certify compliance with this policy upon commencement of service and annually thereafter.

This policy is to be reviewed by the Board on an annual basis.

II. PRINCIPLES

Directors are expected to conduct themselves in their relationship with EBI and Equity at all times in a manner consistent with their fiduciary obligations to the shareholders. The Board expects each director to avoid conflicts of interest, the appearance of conflicts of interest, and any violations of fiduciary responsibilities and duties.

On matters requiring Board of Directors attention, if the matter presents a potential conflict of interest due to the Board member's other commercial or professional interests, such Board member will recuse themselves from any decision regarding such matter and will withdraw from any discussion surrounding such matter unless otherwise requested to remain and participate in the discussion by a majority of the Board members.

III. SPECIFIC PROHIBITIONS

In order to conform to this policy, Directors of EBI and Equity are generally prohibited from:

- Accepting anything of value (other than bona fide compensation, salary, wages and fees) from anyone other than EBI or Equity in connection with the business of EBI or Equity, either before or after a transaction is discussed or consummated if the object of value is given for the purpose of inducing action by EBI or Equity for the benefit of the donor;

- Using their directorship position with EBI or Equity for personal financial advantage, including but not limited to, accepting a business opportunity or other financial benefit from one doing or seeking to do business with EBI or Equity, which business opportunity or financial benefit is not made available to a similarly situated individuals and is offered for the purpose of inducing favorable actions by EBI or Equity.
- Acting as attorney, accountant, compensated consultant or advisor to potential or existing EBI or Equity customers or their affiliates in an adversarial relationship with EBI or Equity Bank. If the Director is a member of a firm, this provision does not prevent other attorneys, consultants or advisors in the firm from acting on behalf of customers of EBI or Equity or their affiliates. However, if that representation involves litigation against EBI or Equity then either the firm must resign from such representation or the Director member of that firm must resign his position with EBI or Equity. A Director, or members of the Director's firm may act as attorney, accountant, compensated consultant or advisor to EBI or Equity provided any compensation paid to said Director or firm is reported by the Director to the Board on an annual basis. Each Director is responsible for reporting to the Board the amount of compensation, fees or other benefits received by the Director or his/her firm, partnership or affiliated business from any vendor or supplier to EBI/Equity or from any customer of EBI/Equity, if such remuneration or benefits are given in exchange for obtaining any product, service or concession from EBI/Equity.
- A Director or the Director's firm may provide products or services to EBI or Equity, with full knowledge of the Board, provided the products or services are provided on terms which are customary in the marketplace and fair to EBI and Equity, and with respect to the purchase of a product for which alternative products are available. Any purchase of a product from the Director or a company represented by the Director must be on a bid basis from at least two (2) other providers. Each Director is responsible for reporting to the Board such transactions as they occur and on the annual Certification of Compliance described below. Such transactions may also be subject to the Related Person Transaction Policy.
- A Director may not serve as a Director for another Financial Institution if that Financial Institution is in direct competition with EBI or Equity. Additionally, such participation as a Director of another Financial Institution, not in direct competition with EBI or Equity, must be approved by the Board or its designated committee in advance of commencement of service. Each Director is responsible for reporting to the Board their participation as a Director for another Financial Institution on the annual Certification of Compliance described below.

IV. POLICY EXCEPTIONS

The Board recognizes that there are appropriate exceptions to the general prohibition of acceptance of anything of value from customers or potential customers of EBI or Equity in connection with the business of EBI or Equity. Generally, these exceptions should include:

- Gifts and gratuities from others based on family or personal relationships.
- Meals, refreshments, accommodations, transportation, and entertainment based on bona fide business discussions or established relationships.
- Business concessions available to similarly situated parties.
- Gifts of reasonable value based on a holiday, other celebration or business or cultural custom, which are not lavish.
- Other things of value if approved by a majority of the Board.

If a Director is offered anything of value which the Director desires to accept and for which Board approval is required for acceptance, then the Director must disclose the following information to the Chairman or the Board, prior to acceptance:

- The gift offered
- The name of the donor and its affiliates
- The value of the gift
- The circumstances surrounding the gift

Any new conflict of interest that arises during the year that has not been previously disclosed to the Board must be reported as soon as possible and no later than the next Board meeting, after the conflict of interest arises.

V. CERTIFICATION OF COMPLIANCE

Each Director is required to certify compliance with this policy on an annual basis, no later than the first Board meeting of each calendar year. The certification will be in the form of a Statement of Disclosure, in such detail as the Statement may require from time to time.

The Equity Bancshares and Equity Bank Audit Committees will review the annual certifications and investigate any matters as deemed appropriate by the Committees and report to the full Board.