



PREMIER FINANCIAL CORP. CODE OF ETHICS

In order to protect Premier Financial Corp. (“PFC”) and its subsidiaries from self-dealing, fraud and misconduct of directors, and employees, the Board of Directors of PFC (the “Board”) intends to hold its directors and employees accountable to the policies and procedures contained in this Code of Ethics and to require the reporting of any violations of this Code of Ethics. This Code of Ethics applies to all directors and employees of PFC and its wholly owned subsidiaries, Premier Bank and First Insurance Group of the Midwest, Inc. PFC, Premier Bank and First Insurance Group of the Midwest, Inc. are collectively referred to as the “Company”.

I. Conflicts of Interest

A conflict of interest exists in any situation where a director or employee has a personal or outside business or financial interest that interferes with, or has the appearance of interfering with, the interests of the Company. A conflict of interest may arise due to the director’s or employee’s personal or business interests, and may also arise as result of the personal or business interests of related party of a director or employee. A related party of a director or employee includes any immediate family member of a director or employee and any organization controlled by a director or employee or an immediate family member of the director or officer. “Immediate family” includes any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of a director or employee, and any person (other than a tenant or employee) sharing the household of a director or employee.

Directors and employees must not engage or participate in any transaction with the Company involving a conflict of interest and are expected to avoid participating in any transaction that may appear to present a conflict of interest. Accordingly, directors and employees are prohibited from processing, reviewing, recommending, or approving any transaction for their own account or the account of an immediate family member or other related party.

Transactions with a director or employee, or their immediate family or other related parties, may still be completed, without the participation or involvement of the applicable director employee.

All directors and employees are required to act in a responsible and respectable manner and to remain free of influences that may result in the loss of objectivity regarding business conducted with the Company’s customers or the Company itself. Each director and employee must disclose and avoid any interest or activities involving another organization or individual that may

result in a conflict of interest between the Company and that organization or individual. This Code of Ethics has been adopted to assist all directors and employees in determining what is appropriate personal and professional conduct and reaffirms the Company's policies of ethical conduct.

Examples of prohibited transactions involving a conflict of interest include:

- Individuals processing transactions for themselves, their immediate family members, or their other related parties.
- Individuals opening an account or loan application or originating, underwriting, approving, or completing ongoing monitoring for credit to themselves, their immediate family members, or their other related parties.
- Individuals approving an overdraft, accepting a check on uncollected funds, or waiving loan or deposit fees on their accounts or any account of an immediate family member or their other related parties. It is also inappropriate for an employee to request a subordinate to complete a transaction that would be considered a conflict of interest for the requesting employee; another employee must process, and the requesting employee's supervisor must also approve, these types of transactions.
- Individuals extending Premier Bank credit to a party who is purchasing an item of personal or real property owned by the loan officer, their immediate family, or their related party.
- Individuals engaging in the purchase of real or personal property that has become the possession of Premier Bank by repossession unless the sale of the repossessed property is through a public/open market auction or competitive bid process subject to the prior approval of the Chief Legal Officer.
- Individuals may not use any Company-owned facility, building, equipment, materials or vehicle for their personal use or benefit or for the personal use or benefit of any related party without the approval of their department manager or in accordance with the Company's Acceptable Use Policy.

Any transaction or business dealing with a director or executive officer, or a related party of a director or executive officer, other than the provision of the Company's products or services in the ordinary course, and except with respect to extensions of credit to a director, executive officer or a related party of the director or executive officer as described below, must be reviewed by the Chief Legal Officer and the Governance and Nominating Committee prior to being completed. Any extension of credit to a director, executive officer, or a related party of a director or executive officer must comply with applicable law and regulation, including the provisions of Regulation O.

Transactions that would otherwise constitute, or appear to constitute, a conflict of interest will only be permissible if 1) the associated employee or director is not involved in approving, recommending the approval of (though referrals to other decision makers at the Company are permitted), or processing the transaction); 2) the terms of the transaction are at least as favorable as those expected in a comparable arms-length transaction or if it can otherwise be

established that the Company is not disadvantaged by the transaction being completed with a related party; and 3) the director, officer, or related party of a director or employee does not receive confidential information relating to the proposed transaction that provides an unfair advantage over outside providers.

II. Confidential Information

Confidential information includes but is not limited to information relating to the Company's business operations, results, plans or strategies; pricing; forecasts; pipelines; business referrals; promotional practices; products or product specifications; compensation plans and arrangements, including incentive compensation plans or related performance specifications; training, reference or educational materials; current, prospective and former customer names and information, including but not limited to contact, financial and account information; quality control or compliance standards; contracts or relationships with suppliers, vendors, independent contractors or other parties; and any information which the Company is obligated to treat as confidential. Confidential information may be contained in records, files, paper documents, electronic files, or databases, and includes information known by employees or directors even if not maintained in physical or electronic records.

All directors and employees of the Company may use confidential information only for the Company's business purposes and may not use such information for personal, familial, or other gain. Confidential information may not be disclosed to others except when such disclosure is authorized by the Company or as otherwise permitted by applicable law. Confidential information should only be shared with or accessible to employees who have a business need for the information. All employees and directors are required to protect, manage and secure all confidential information in their possession and comply with all Company policies relating to the information security and customer privacy.

These obligations concerning the non-disclosure, non-use, and protection of confidential information continue at all times during and after an employee's or director's association with the Company.

Nothing in this Code of Ethics, prohibits an employee from: (1) reporting possible violations of federal or other law or regulations, including any possible securities laws violations, to any governmental agency or entity, including but not limited to the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the Commodity Futures Trading Commission, the U.S. Congress, or any agency Inspector General; (2) making any other disclosures that are protected under the whistleblower provisions of federal or other law or regulations; or (3) filing a charge or complaint or otherwise fully participating in any governmental whistleblower programs, including but not limited to any such programs managed or administered by the U.S. Securities and Exchange Commission, the Commodity Futures Trading Commission and/or the Occupational Safety and Health Administration. Additionally, limited exceptions to these confidentiality obligations for trade secrets in specific situations are set forth in the federal Defend Trade Secrets Act of 2016, including the disclosure of a trade secret that: (a) is made (i)

in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made to an employee's attorney in relation to a lawsuit against the Company for retaliation against an employee for reporting a suspected violation of law; or (c) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

III. Gifts and Entertainment

Directors or employees must not (a) solicit anything of value from prospective or current customers, associates, or any other individual or business in return for any business, service or confidential information of the Company, or (b) accept anything of value (other than compensation paid by the Company) from prospective or current customers, associates, or any other individual or business either before or after a transaction is discussed or completed.

Unsolicited gifts from prospective or current customers, associates, or any other individual or business must be declined to avoid any appearance of impropriety with the following exceptions:

- Business meals;
- Holiday gifts;
- Gifts based upon a personal relationship pre-dating the director's or employee's involvement with the customer or vendor on behalf of the Company;
- Discounts or rebates generally available to the public.

Even if an unsolicited gift meets one of the above exceptions, directors and employees must consider the reasonableness of the gift's value to avoid potential conflict of interest issues. Generally, if the value of the gift is greater than \$100, it must be reported to the Chief Legal Officer who will evaluate and determine on a case-by-case basis whether the gift may be retained or should be returned.

Monetary gifts (e.g. cash or gift certificates) may not be accepted regardless of the value. Additionally, no gifts, entertainment or other items of personal value to an employee or director may be accepted from or promised by a vendor or potential vendor at any time the vendor or potential vendor is participating in a request for proposal by the Company or the Company is otherwise in the process of considering engaging the vendor or considering whether to increase or reduce the level of engagement with the vendor.

Directors and employees are expected to participate in entertainment and activities of reasonable cost to facilitate business. Tickets for sporting, cultural, or other events purchased by the Company are to be used for entertaining potential or current customers, suppliers, or others for business purposes. If it is determined prior to the event that the tickets will not be used for such business purposes, tickets may be offered to directors or employees.

IV. Outside Employment and Activities

The Company encourages involvement in outside activities, including charitable and political functions. Directors and employees may not however accept any outside employment or activity that creates, has the potential to create or may appear to create a conflict of interest with the Company, or that could result in reputational risk for the Company. Outside employment or activities that compete with the activities of the Company are prohibited. Using any Company information or taking advantage of any business opportunity that would otherwise belong to the Company is strictly prohibited.

No outside employment or activity may interfere with an employee's or director's responsibilities to the Company or their ability to perform their role for the Company, use Company assets or resources (including physical space, equipment, or supplies), or be conducted in a manner that may cause others to believe the individual is acting on behalf of the Company when conducting the outside activity.

At no time may directors or employees solicit the Company's employees for political contributions or coerce or pressure others into contributing to any organization.

Offers of directorship to any outside organization that has or desires a business relationship with the Company, or to any institution within the financial industry, must be reported to the Chief Legal Officer and approved as waiver to this Code of Ethics as described below prior to acceptance.

Employees must report any additional employment outside of the Company to their manager and the Human Resource Department business partner for their area.

V. Conduct of Insiders

"Insider" is defined as a director, executive officer, or 10% shareholder of the Company. Insiders must take care that their conduct does not violate rules relating to self-dealing and personal gain, including those described in the Company's Insider Trading Policy. At no time are Insiders allowed to take advantage of their position in the Company for personal profit or to influence any Company decisions concerning credit and other business matters for their own accounts, the accounts of related parties or other, or with regard to their other business or personal interests.

VI. Compliance with Laws and Policies

The Company is subject to numerous federal, state and local laws, rules and regulations. Directors and employees must comply with these laws, rules and regulations, including the policies, guidelines and procedures that the Company has adopted to facilitate such compliance.

All directors and employees are required to comply with **ALL** policies, guidelines, procedures, and standards of the Company. Certain of these policies and standards more directly address the conduct of directors and employees in accord with the expectations set forth in this Code of Ethics. These include, but are not limited to, the policies and standards described in the Employee Handbook, the Acceptable Use Policy, the Loans to Insiders Regulation O Policy, and the Insider Trading Policy. Additionally, directors and executive officers are expected to comply with any applicable standards of conduct described in the Company's Corporate Governance Guidelines.

VII. Business Records and Company Reporting

Accurate business, financial, and transaction records are essential to the Company's operations and reporting obligations. All records must be accurate, complete, fairly represent the transaction or business matter being recorded, and be documented and managed according to all applicable internal controls and procedures.

All directors and employees are responsible for disclosing to management all information necessary to assist the Company in creating full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with the U.S. Securities and Exchange Commission (SEC) and other regulators, or in other public communications made by the Company. All directors and employees must promptly report to their manager, executive management, or the Audit Committee any information that affects any disclosures made by the Company.

All transactions must be executed in accordance with applicable policies, procedures and internal controls, including those concerning authority levels and vendor management protocols.

VIII. Employee and Director Accounts

All directors and employees are encouraged to maintain their personal accounts at Premier Bank to allow direct deposit of payroll checks.

Under no circumstances will Premier Bank pay a rate of interest on deposit accounts of directors, employees, or their related parties in excess of the rate available to other customers. All applicable fees, including overdraft charges, will be assessed on all accounts of employees, directors, principal shareholders, and executive officers in the same fashion as on accounts of non-insiders. Notwithstanding the above, the Company may establish special products and


services for its employees with additional benefits or enhancements, when compared to the Company’s general products and services, which are available to all employees and directors.

IX. Procedures for Reporting Violations

All directors and employees are expected to report any misconduct or conduct that is, or is suspected to be, illegal, unethical, or that violates this Code of Ethics. Reporting misconduct or suspected misconduct is important to protect the Company, its assets, interests and employees, and to support the ethical culture of the Company. Failing to report misconduct or a violation of this Code of Ethics may itself be a violation of this Code of Ethics, possibly resulting in disciplinary action.

If an individual knows or suspects misconduct or any activity that is, or is suspected to be, illegal, unethical, or that violates this Code of Ethics, the individual should report the activity or contact one of the resources listed below if they have questions or need assistance in determining if a report should be filed.

Reporting Resources/Methods:

<ul style="list-style-type: none"> • The individual’s manager or a more senior manager in their department • The Human Resources Business Partner supporting the individual’s department or the Chief Human Resources Officer: Sharon Davis • Premier’s Chief Legal Officer: Shannon Kuhl 	<p>Anonymity may not be feasible with these reporting methods depending on how the individual contacts them. Company email or phones, or calls or messages from devices where the sending number is not blocked do not provide anonymity.</p>
<ul style="list-style-type: none"> • Premier’s anonymous reporting services provided through an independent third party, Ethicspoint <ul style="list-style-type: none"> - Call toll-free: 833-407-9587 - Online via web: yourpremierbank.ethicspoint.com - Online via mobile phone: yourpremierbankmobile.ethicspoint.com - Online via QR Code: 	<p>Individuals have the option to report anonymously using this reporting method.</p>

<ul style="list-style-type: none"> • Written correspondence addressed to any of the following individuals: <p style="padding-left: 40px;">Premier Financial Corp. Board of Directors Attn: Audit Committee Chair 601 Clinton Street Defiance, OH 43512</p> <p style="padding-left: 40px;">Premier Financial Corp. Board of Directors Attn: Executive Chair 601 Clinton Street Defiance, OH 43512</p> <p style="padding-left: 40px;">Premier Financial Corp. Attn: Chief Legal Officer 275 W. Federal Street Youngstown, OH 44503</p>	<p>Individuals may remain anonymous.</p> <p>The outer envelope should be clearly marked as “CONFIDENTIAL” if a report is mailed or sent interoffice to these individuals</p>
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The Company will investigate all reports of misconduct or conduct that is, or is suspected to be, illegal, unethical, or that violates this Code of Ethics regardless of how the conduct is reported. It is important that each individual making a report provide sufficient information and detail to enable the investigation, particularly where the report is made anonymously. All employees and directors are required to cooperate fully and honestly in any investigation conducted by the Company or any law enforcement or regulatory authority. While some reporting methods allow the individual making the report to remain anonymous, the Company will protect the identity of any individual making a report to the fullest extent possible and only share this information on a “need to know” basis if necessary to conduct a fair and thorough investigation.

X. Non-Retaliation

Retaliation, in any form, against anyone who makes a good faith report of any misconduct or any violations or suspected violations of this Code of Ethics, applicable law, or any other applicable policy or standard is strictly prohibited. Prohibited forms of retaliation include any type of intimidation, harassment, act of reprisal, interference in job responsibilities, as well as any type of adverse employment action, including termination, demotion, or loss of benefits.

To make a report in “good faith” means the individual believes the information is truthful and accurate. An individual’s report does not have to be “right” in order to be made in good faith. Making a report other than in good faith, or making false statements in connection with a report or investigation, may result in disciplinary action, including termination of employment.

Any retaliation against an employee who in good faith raises an issue or makes a report of misconduct or any violation or suspected violation of this Code of Ethics, applicable law or any other applicable policy or standard, is itself a violation of this Code and should be reported to the Chief Legal Officer or the Chief Human Resources Officer, or by using the reporting methods described in the preceding section.

XI. Questions

Before taking any action in any particular situation, directors and employees should ask themselves:

Will my conduct result in a violation of the Code of Ethics violate, or if it were made public, will my conduct have the potential to appear to violate the Code of Ethics or otherwise be perceived as contrary to the Code of Ethics?

If the answer is anything other than “NO” to any part of this question, the individual should refrain from the activity and seek assistance from any of the resources identified above. The Chief Legal Officer of the Company, together with the Board of Directors and the Governance and Nominating Committee as appropriate, is responsible for interpreting this Code of Ethics, and all questions in this regard should be referred to the Chief Legal Officer.

XII. Waivers

Any waiver of this Code of Ethics for directors or executive officers of the Company may be made only by the Board of Directors upon the recommendation of the Governance and Nominating Committee and may be publicly disclosed as required by applicable law or Nasdaq rules.

Waivers of this Code of Conduct for any other employees may only be approved by the Chief Legal Officer.

XIII. Compliance with this Code of Ethics

Upon joining the Company or one of its subsidiaries, each employee will read and agree to abide by the Code of Ethics. Annually, each employee and director will be required to reaffirm that they have read and agree to abide by the Code of Ethics. At the Company's discretion and judgment, the Company may revise, withdraw or add any rules, policies, or procedures at any time. Changes and amendments to this Code of Ethics will be approved by the Company's Board of Directors and disclosed or reported in compliance with applicable law or Nasdaq rules.

Failure to comply with this Code of Ethics may result in the termination of employment or other disciplinary action. The action will be commensurate with the seriousness of the conduct and an evaluation of the situation. .

All violations of this Code of Ethics will be reported to the Audit Committee of the Board of Directors. Termination of employment or other disciplinary action based upon a violation of this Code of Ethics will be determined by the Chief Legal Officer and the Chief Human Resources Officer as necessary or appropriate.

Revision Date: April 25, 2023

Reporting contact information updated: November 01, 2023