Organizational Functional Area:	WSFS Financial Corporation
Policy For:	Code of Business Conduct and Ethics (the "Code")
EC Approved:	September 18, 2025
Board Approved:	October 23, 2025
Last Revision Date:	September 19, 2024
Department/Individual Responsible for Maintaining/Updating Policy:	Chief Legal Officer – Legal

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CODE OF BUSINESS CONDUCT AND ETHICS

Introductory Note

The Code of Business Conduct and Ethics (the "Code") applies to all Associates, Directors and Advisory Board Members of WSFS Financial Corporation, Wilmington Savings Fund Society, FSB and the respective subsidiaries and affiliates of WSFS Financial Corporation and Wilmington Savings Fund Society, FSB (collectively "WSFS"). This Code includes our *Gifts, Gratuities and Bequests Policy* (page 15). The Code must be annually attested to by all Associates, Directors and Advisory Board Members.

When utilizing this Code, be aware that certain terms are capitalized. This means that those terms have been explicitly defined. Please see an alphabetical listing of these terms beginning on page 21 for further explanation.

Policy Statement

Values describe how an organization behaves under all circumstances. Our values are the foundation of our culture. They define us and serve as our moral compass. Our values are rooted in integrity; we do the right thing, unconditionally. We live our values every day, they nourish our culture and practiced, over time, become "the WSFS way." Our values are the fuel that ignites our virtuous cycle: when we do well, our community does well and when our community does well, we do well.

There are three fundamental values that describe our behavior.

- Service: Serving others is fundamental to our "mission" and grounds for our purpose;
- Truth: The truth is non-negotiable. The truth brings clarity to a challenging situation or sensitive matter, it guides us with confidence and conviction; and
- Respect: We value and respect each other and all we serve.

This Code sets forth rules governing the conduct of all Associates, Directors, and Advisory Board Members, and promotes the following objectives:

- Honest and ethical conduct in our interactions with each other, with our Clients, and with our community;
- Ethical and responsible approaches to actual or apparent conflicts of interest and making appropriate disclosures;
- Commitment to equal employment opportunity and a workplace free from discrimination, harassment, retaliation, and bullying;
- Full, fair, accurate, timely, and understandable disclosure in internal reports, reports submitted to the Securities and Exchange Commission ("SEC") and to our Federal and State banking regulators, and other public communications by WSFS;
- Compliance with applicable governmental laws, rules, and regulations;
- Prompt internal reporting of Code violations, supported by our policy of requiring suspected violations be reported prohibiting retaliation against those who report; and
- Accountability for adherence to the Code including discipline up to and including termination for non-compliance.

Scope and Basic Principles of the Code of Business Conduct and Ethics

This Code sets out in broad terms the general principles governing the business conduct of WSFS Associates, Directors, and Advisory Board Members. However, as it is impossible to explicitly delineate every single activity that is inconsistent with WSFS' ethical standards, or to set forth rules covering all conceivable situations in which a conflict of interest may arise, this Code is not intended to be exhaustive. Rather, the Code's provisions serve as a guide for applying WSFS' basic ethical principles to a variety of situations. By implementing this Code and adhering to its letter and spirit, WSFS Associates, Directors, and Advisory Board Members will accomplish the Code's purpose. It should be noted that this Code is in addition to, and not a replacement for, WSFS policies and procedures that address the specifics of our business, or which may impose stricter or more detailed requirements.

Upon employment with WSFS, appointment to the Board of Directors or to an Advisory Board, and on an annual basis thereafter, each individual will be required to read, acknowledge, and complete the applicable affirmation or disclosure requirements for the Code. Completed affirmations and disclosures will be maintained by the Human Resources Department. In addition to the annual affirmation and disclosure requirements, all Associates are expected to promptly report to the Ethics Committee and their Human Resources Business Partners all changes to any relationship or interest for which disclosure is required under the Code. Directors and Advisory Board Members are expected to report such changes to the Corporate Secretary and the Chair of the Corporate Governance and Nominating Committee.

It is WSFS' policy that Associates, Directors, and Advisory Board Members, as well as their Immediate Family Members, should avoid any financial or non-financial interests, positions, payments, and activities which conflict, or reasonably appear to conflict, with the proper performance of the duties and responsibilities of the Associate, Director, or Advisory Board Member to WSFS, or which might affect their independent judgment in transacting with Clients, prospective Clients, stockholders, vendors/suppliers and others on WSFS' behalf. WSFS Associates, Directors, and Advisory Board Members must be truthful in their dealings with WSFS and conduct themselves with honesty and integrity. The best way to avoid inadvertently violating the Code is to consult with the Ethics Committee before engaging in an activity which could be deemed a conflict of interest.

When Associates are hired, they must inform WSFS of any non-competition, non-solicitation, confidentiality, or other agreement that they are party to that could restrict the Associate from performing their duties at WSFS. Also, the use at WSFS of any written or electronic proprietary information of a former employer is not permitted.

Reporting of Code Violations; Non-Retaliation; Confidential Submissions

It is the responsibility of all Associates, Directors and Advisory Board Members to report any violations or suspected violations of the Code, as well as any violation or suspected violation of law, statute, or regulation or any suspected misconduct. Associates must report any known or suspected violation to their Human Resource Business Partner, the Chief Legal Officer or the Ethics Committee. All Directors and

Advisory Board Members must report any known or suspected violation to the Chair of the Audit Committee of the WSFS Financial Corporation Board of Directors.

Violations may also be reported into WSFS's Accounting, Auditing, Internal Control, and Ethics Hotline (the "Hotline") via the online portal located at www.reportanissue.com or calling toll free at 1-800-759-9819. The Hotline is provided by an independent third party and is available 24 hours a day, 7 days a week.

WSFS managers have a particular responsibility to notice and question incidents, circumstances and behaviors that point to a reasonable possibility that a violation of the Code has occurred. A manager's failure to follow up and, as required by the Code, report information suggesting an actual or potential violation of the Code is, in itself, a violation of WSFS policy. WSFS will neither engage in nor tolerate unlawful or unethical behavior with regard to any of its policies, practices, or operations. All violations by an Executive Officer, Director or Advisory Board Member of any WSFS policy, practice or procedure, including suspected violations of this Code, should be reported to the Chair of the Audit Committee or the Ethics Committee via email at EthicsCommittee@wsfsbank.com, or reported directly to the Hotline. Any violations or suspected violations can also be reported confidentially by mail to WSFS Bank, Chair of the Audit Committee or the Ethics Committee, 500 Delaware Avenue, Wilmington, DE 19801.

Any reported known or suspected violations of this Code will be investigated by the Ethics Committee or the Audit Committee, as applicable. WSFS prohibits retaliation of any kind against individuals who have made good faith reports of Code violations or other potentially illegal or unethical conduct. Any concerns about retaliation should be reported immediately to the Chief Human Resources Officer or the Chief Legal Officer.

If there is any question as to whether any activity may create an actual, potential, or perceived conflict of interest and/or interfere with an Associate's, Director's, or Advisory Board Member's responsibilities to WSFS, you should contact the Ethics Committee at EthicsCommittee@wsfsbank.com.

Full, Fair, Accurate, Timely and Understandable Public Disclosures

It is WSFS' policy that the information in its public communications, including SEC filings, provide a full, fair, accurate, timely, and understandable disclosure. All Associates and Directors involved in WSFS' disclosure process, particularly the Senior Level Financial Officers, are responsible for adhering to and promoting this policy. Specifically, these individuals must maintain familiarity with the applicable disclosure requirements and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about WSFS to others, including WSFS insiders, the public, and WSFS' independent registered public accounting firm. In addition, any Director or Associate who has an oversight or supervisory role in WSFS' disclosure processes is obligated to discharge his or her responsibilities diligently.

Compliance with Laws and Regulations

All WSFS entities, through the actions of their Associates, Directors and Advisory Board Members will conduct their business and affairs in compliance with all applicable federal, state, and local laws and regulations; as well as the laws and regulations of any foreign country in which WSFS conducts business.

Confidential and Insider Information

Confidential Information

Confidentiality is one of the essential elements of our business. All Associates, Directors and Advisory Board Members shall maintain Confidential Information (as defined below in this section) in the strictest of confidence; shall not disclose Confidential Information to any person or Organization outside of WSFS except to WSFS's Agents on a need-to-know basis, or to respond to any subpoena, summons, court or administrative order, or other legal process that requires WSFS's compliance; and shall not use, reproduce, disseminate, or take any other action with respect to Confidential Information, other than for valid business purposes. Associates, Directors and Advisory Board Members shall not remove Confidential Information from WSFS premises unless necessary for the performance of their WSFS job duties or services. Further, Associates who have access to Confidential Information as part of their essential job functions are prohibited from disclosing Confidential Information to other Associates, except on a need-to-know basis. Confidential Information should be communicated between WSFS departments/subsidiaries only when there is a legitimate business need to do so. These obligations apply for the duration of the Directors' or Advisory Board Member's term of service and the Associates' employment and survive in perpetuity.

All Associates, Directors and Advisory Board Members shall cease use of, and return or destroy, all Confidential Information (regardless of form, e.g., hard copy, digital copy, etc.) immediately upon cessation of the Associate's employment, or Director's or Advisory Board Member's term of service, or upon direction from the Associate's supervisor. To be clear, no Confidential Information shall be used for the benefit of any person or Organization other than WSFS.

As used in this Code, the term "Confidential Information" includes, but is not limited to, records, documents, programs, technical data, information technology, policies, files, lists, client and Associate non-public personal information, pricing, costs, strategies, market data, statistics, business partners, Clients, Client requirements, prospective Client contacts, referral sources, methods of operation, processes, trade secrets, methods for determining prices, prices or fees, financial condition, profits, sales, net income, and indebtedness, potential mergers or acquisitions, the sale of WSFS assets or subsidiaries, commercial contracts and relationships, litigation (actual and threatened), Board information, and information acquired in connection with WSFS or Advisory Board employment, or Director or Advisory Board service. Information acquired in connection with WSFS employment or Director service includes, without limitation, proprietary or Confidential Information of any third party who discloses such information to WSFS in the course of business, and any other information relating to WSFS that has not been made available to the general public, as the same may exist from time to time. The term "Confidential Information" as used in this Code does not include any information which is, or becomes part of, the public domain through no act or fault of a WSFS Associate, Director or Advisory Board Member.

- **Client, Stockholder, and Vendor/Supplier Information**. The relationship between WSFS and its Clients, stockholders, and Vendors/Suppliers is based on mutual trust and confidence. Clients, stockholders, and Vendors/Suppliers expect, and regulations sometimes require, WSFS to maintain certain personal and business information in strict confidence. Information concerning a Client's, stockholder's, or Vendor/Supplier's business relationship, loans, accounts, balances, credit ratings, experiences, or any other transaction with WSFS is strictly confidential and must not be discussed with, or divulged to, unauthorized persons (whether inside or outside of WSFS). Specific policies and procedures have been developed for WSFS personnel authorized to release or discuss Client, stockholder, and Vendor/Supplier information. Questions and requests to discuss or release such information should be directed to the Ethics Committee.

- **Corporate Affairs**. Associates, Directors, and Advisory Board Members are prohibited from discussing confidential matters and divulging Confidential Information related to WSFS' affairs outside of WSFS' offices, technology or servers, except to the extent necessary to conduct WSFS business.

- **Client Lists and Other Confidential Information**. All documents and records[1] (collectively, "records") concerning WSFS business and affairs are the confidential and the exclusive property of WSFS and the right to use such records belongs exclusively to WSFS. WSFS' records include, but are not limited to, its books and records; names, addresses, and telephone numbers; assets and obligations carried in the accounts of WSFS' Clients; computer software or hardware used in computer or word processing equipment; training materials; and policy and procedural manuals and bulletins. WSFS' records include the originals and all copies of originals. All WSFS Associates are prohibited from removing WSFS records from its premises in either original or copied form, except for use in business or with specific prior approval from the Ethics Committee.

Insider Information Concerning Investments

An Associate's, Director's or Advisory Board Member's position within WSFS may provide access to Insider Information, the disclosure or use of which can result in civil or criminal penalties for both WSFS and the offending individual under federal securities laws. Associates, Directors and Advisory Board Members must not use or disclose Insider Information in any manner that violates federal or state securities laws, including, without limitation, in connection with effecting or recommending a securities transaction for his/her own account, or effecting or recommending a securities transaction for the account of an Immediate Family Member, WSFS, any WSFS Client, any WSFS stockholder, or any other person or Organization. These obligations are in addition to, and not in lieu of, the obligations of set forth in the WSFS Financial Corporation *Insider Trading Policy*. Please refer to the *Policy and Procedures for Permissible Trading by Insiders* for complete details.

Electronic Data and Information

Due to the pervasive use of, and dependency on, various electronic tools, including but not limited to e-mail, facsimile, the Internet, and pre-approved information technology applications and artificial intelligence, WSFS Associates must act with caution when utilizing such tools to exchange information. Specifically, when engaging in any type of electronic communications, Associates must adhere to the principles outlined above regarding non-disclosure of confidential Client,

[1] Including all information, data, formula, and intangible property or property right preserved in any form including, without limitation, paper, disc, CD, electronic or digital storage mechanism, or any other form currently existing or developed in the future.

stockholder, and Vendor/Supplier information to unauthorized persons or Organizations. Additionally, Associates must adhere to all policies and guidance addressing the appropriate use of information technology applications, in particular, artificial intelligence.

WSFS has established a *Social Media Policy* as a guide for Associates regarding the personal and business use of social media via the Internet. Associates are expected to adhere to this policy. Please refer to the *Social Media Policy* for complete details.

Conflicts of Interest: Personal and Financial Matters

- **General:** Personal investments and finances should be managed in a manner consistent with employment with a banking institution or affiliate. Associates, Directors and Advisory Board Members should exercise prudence in making personal investment and financial decisions and avoid situations which may influence the judgments or advice they give on WSFS' behalf; they are expected to maintain their financial affairs in an ethical manner and to manage their personal finances properly. Neither Associates nor their direct reports may approve or process any transactions, including serving as relationship manager, for their personal accounts, the accounts of Immediate Family Members, or accounts in which they have a personal financial interest or on which they are an authorized signer. Associates should disclose to their manager any relationship they or their Immediate Family Member has with a Client or potential Client when the Associate could be involved in a day-to-day management or decision-making role regarding that Client relationship.

WSFS assets are to be used exclusively in the pursuit of WSFS business except for minimal personal use authorized by your manager in accordance with other WSFS policies. WSFS assets include equipment, facilities, supplies, services such as telephones and computer networks, and the time and effort of its Associates. You should not use WSFS assets for personal gain or convenience or make WSFS assets available for the gain or convenience of anyone else, or for any purpose other than conducting corporate business unless you have authorization from the Ethics Committee to do so. Associates may not use WSFS' logo or stationery for personal purposes.

- **Investments:** Associates, Directors and Advisory Board Members are prohibited from purchasing or selling securities or other investments for his/her account, an Immediate Family Member's account, or any other person's or Organization's account, based on Insider Information. This prohibition includes, but is not limited to, purchases and sales made with knowledge of anticipated or probable changes in WSFS' investment policy, as well as those made with knowledge that WSFS is affecting, or proposing to effect, transactions in a particular security or investment. Associates, Directors and Advisory Board Members must not use their position to obtain leverage to purchase new issues or thinly traded securities for their own account, the account of an Immediate Family Member, or any other person or Organization. Associates who purchase or sell securities for WSFS cannot engage in personal securities transactions with WSFS' securities dealers, or accept gratuities from such dealers, except as provided in the Bank Bribery Act- Gifts, Bequests, and Gratuities Policy (see page 15 below). In addition to the above, Associates and Directors should refer to the Corporation's *Insider Trading Policy* governing transactions in securities.

Associates, Directors and Advisory Board Members should disclose when they have an ownership or investment interest in a non-WSFS affiliated entity, including non-profits and Vendors/Suppliers. Similarly, Directors, Advisory Board Members, and any Associates with a Vice President, Senior Vice President, or Executive Vice President title holding leadership roles in non-profits, even absent an ownership or investment interest, should disclose those roles.

- **Borrowing:** Associates should borrow only from commercial banks, other reputable sources of credit that regularly lend money, or an Immediate Family Member. Associates and their Immediate Family Members are not permitted to borrow from Bank Clients or Vendors/Suppliers unless lending is within the Client's or Vendors/Supplier's ordinary course of business. Even in this case, borrowing must be on terms customarily offered to others under similar circumstances and without special concessions on interest rate, term, security, repayment, or other terms. Loans and other extensions of credit between the Bank and its Directors, Executive Officers and applicable Related Interests are governed by the Bank's *Regulation O Policy* and the standards set forth in the Bank's *Credit Policy*.

  Concerning the grant of direct or indirect credit accommodations, Associates, Directors and Advisory Board Members are not permitted to, on WSFS' behalf, make recommendations, represent, or exercise authority, with respect to:

  - Immediate Family Members;
  - Any individual or Organization lending money to, or employing, Immediate Family Members; or
  - Any Organization with which they or an Immediate Family Member are associated.

- **Transactions with Clients, Borrowers, or Vendors/Suppliers:** Except for those transactions properly disclosed in compliance with the *Related Party Transaction Policy and Procedures*, Associates, Directors and Advisory Board Members are prohibited from engaging in certain transactions with Clients, borrowers, and Vendor/Suppliers. This prohibition covers investments in stock or other ownership interests; lending personal funds; and cosigning, endorsing, or otherwise assuming personal liability for borrowed funds of a Client, borrower, or Vendor/Supplier. Associates, Directors, and Advisory Board Members are prohibited from marketing or providing testimonials as a representative of WSFS for any Vendors/Suppliers or non-WSFS affiliated entities without receiving prior written approval from the Ethics Committee.

Associates are expected to take responsibility for their signatures and are permitted to sign only their own names. Associates must not sign documents on behalf of WSFS, unless they are an Officer of WSFS and must not sign on Clients' accounts or otherwise represent Clients. This prohibition does not apply, however, to any transactions between an Associate or Director, and

- An Immediate Family Member;
- An Organization in which an Immediate Family Member has a majority or controlling interest, either directly or indirectly;
- An Organization over which an Immediate Family Member has majority control, whether direct or indirect;
- Any publicly owned entity; or

- Any Organization that serves as a Director's, or an Immediate Family Member's, principal occupation.

<u>Insurance and Sale and Purchase of Property or Purchasing of Corporate and Fiduciary Assets</u>

An Associate shall not acquire real estate, an insurance interest, or other interests from WSFS Clients over whose accounts the Associate exercises direct control, and Associates, Directors and Advisory Board Members shall not purchase property on which WSFS is foreclosing or is known to be contemplating foreclosure without prior approval by the Ethics Committee. Except as permitted by applicable federal or state law or regulation, Associates, Directors and Advisory Board Members and their Immediate Family Members may not sell property or services to or buy or invest in property from WSFS. If an Associate wishes to bid on a current WSFS Client's or active prospective Client's property, the following steps must be taken:

- The Associate informs the Ethics Committee of the relevant information and gains approval to bid on the property;
- The property is offered at public sale by WSFS;
- Seller and seller's representatives are made aware that the Associate is a bidder on the property and the Associate must remove themselves from any involvement (voting, advice, counsel, etc.) regarding all of this Client's banking activity for, at least, a period of one year; and
- The sale is based upon independent appraisals or bids which have been documented in writing and submitted to the Chief Auditor. The Chief Auditor must complete a price/appraisal review of the purchase transaction prior to the closing of the transaction.

If an Executive, Director, or Advisory Board Member wishes to bid on a current WSFS Client's or active prospective Client's property, the above steps must be taken with the applicable information provided and approval received from the Board of Directors.

Senior Level Officers, Directors, and Advisory Board Members or their Immediate Family Members are not permitted to buy property of any type sold by WSFS Wealth Management Division without prior approval of the Board of Directors.

- **<u>Related Party Transactions</u>:** With the exception of extensions of credit in accordance with the Bank's *Regulation O Policy and Credit Policy*, Related Party Transactions shall be reviewed and approved by the Corporate Governance and Nominating Committee and approved by the Board of Directors. Refer to *Regulation O* and *Related Party Transaction* policies for further details.

- **<u>Associate Personal Lending Relationships with Other Financial Institutions</u>:** To avoid any conflict of interest and any potential or perceived conflict of interest, when requesting or originating loans (i.e., mortgage loans, personal loans, etc.) from or to lending officers at other financial institutions, Associates must avoid dealing with lending officers at these institutions with whom they have direct or prior business relationships.

<u>Conflicts of Interest: Outside Activities</u>

<u>General</u>: No outside activity of any Associate, Director or Advisory Board Member may interfere or conflict with WSFS' interests. One must recognize that accepting outside employment or directorships, participating in other Organizations' affairs, and engaging in political activities may potentially result in a conflict of interest with WSFS.

- **<u>Outside Business Activities or Employment</u>:** Associates must first obtain permission before becoming an employee, officer, consultant, advisor or director of an outside business entity or Client**.** WSFS prohibits Associates from engaging in any business activity or employment which interferes with their duties to WSFS or WSFS' stockholders; divides their loyalty; creates an actual or apparent conflict of interest; or exposes themselves or WSFS to possible criticisms or adverse publicity. Associates are required to disclose all outside employment and, except as set forth below in Community Activities, must obtain prior approval for outside employment, business activities, and directorships from the Ethics Committee.

- **<u>Fiduciary Relationships and Activities</u>:** All fiduciary activities undertaken by Associates must be in accordance with the best interests of the Client and the requirements of the law. All fiduciary activities must be executed in a fair and equitable manner, with impartiality in the allocation of information, expertise, and the timing of investment executions. In executing its fiduciary responsibilities, WSFS will give no preferential treatment to a particular Client based on the size or type of Client relationship with WSFS.

  See also the section entitled "Bequests, Devises or Benefits Under Wills and Trusts" on page 17.

- **<u>Political Activities</u>:** WSFS encourages Associates, Directors and Advisory Board Members to be informed about and participate in the political process and political activities, provided such participation is done in a legal manner on the individual's own time, and does not unduly interfere with their duties, or disparage WSFS's products or services or otherwise create a conflict of interest with WSFS. WSFS further encourages Associates, Directors and Advisory Board Members to vote in elections and, if they so choose, to make <u>voluntary</u> contributions of time and/or money to political and governmental activities. WSFS' Chief Executive Officer and members of the Executive Leadership Team must disclose any monetary or in-kind contributions to political and governmental activities as part of their Code of Business Conduct and Ethics Affirmation and, to the extent necessary, update the Ethics Committee, Chief Legal Officer, and Chief Human Resources Officer throughout the year. Associates are prohibited from consenting to or making political contributions or expenditures of any kind or nature directly or indirectly to any political Organizations on behalf of, or in the name of WSFS, unless approved in writing by WSFS, except for WSFS PAC activities.

  Corporate disbursements of money, property, or services to any government official, political party, or candidate are strictly prohibited. This prohibition applies to both domestic and foreign governments and even where such contributions are legally permissible. No offers, promises, or payments are to be made to any foreign government official or Organization to win preferential treatment, secure business, or obtain special concessions for WSFS. Foreign government official is interpreted very broadly, and there is no monetary threshold. This prohibition applies everywhere in the world and includes both direct and indirect offers, promises, and payment. Payments include property and services; and need not be illegal or satisfy any monetary threshold. Additionally, the broad interpretation of "foreign official" includes, but is not limited to, foreign officials, their family members, and their business; state owned businesses and their employees; and any other foreign government representative.

Associates, Directors and Advisory Board Members must not use the corporate name in connection with any political fund-raising activity, including any printed materials used in such activity. Associates may not use WSFS' logo or stationery for personal purposes. Associates must obtain approval from the Ethics Committee before becoming a candidate for public office, accepting any nomination or appointment to public office, or agreeing to serve as an official (such as a campaign manager, chairperson, or treasurer) in a political campaign.

- **Community Activities:** We encourage Associates to participate in civic, religious, charitable, and political activities as long as they do not interfere with the performance of your duties at WSFS. Supplies, materials, and other property belonging to WSFS may not be used in more than an incidental way. WSFS should not be identified, nor its name used in community activities without the knowledge of management. Associates are not to act as an official of any Organization without prior approval from the Ethics Committee, with the following permitted exceptions: social, religious, charitable, philanthropic, or civic Organizations; colleges or schools; neighborhood associations; clubs; trade or professional Organizations associated with banking or business. Associates, Directors, and Advisory Board Members should disclose their relationships with charitable Organizations prior to receiving any proposed donation from WSFS, the WSFS Cares Foundation, or any principal shareholder of WSFS.

Serving as a Director or Officer of an Organization other than a WSFS Company

General Rule: Except as set forth below (see Exceptions – page 17), service by a WSFS Associate as a director, advisory board member, or officer of any other Organization requires approval by the Ethics Committee. Such approval does not necessarily carry with it the right to indemnification under WSFS' Articles of Incorporation or Bylaws, however, as those provisions require that the WSFS Associate be serving at the Corporation's request.

To be deemed as serving at the "Corporation's request," the following must occur:

- An executive officer of the WSFS business line or subsidiary must specifically request, in writing, that the individual serve as a director or officer of the non-WSFS Organization; and
- Such request must be approved by the Ethics Committee.

Each such request will be presented to the Ethics Committee for its approval, and the action taken will be recorded by the Chief Human Resources Officer or designee. All such approvals and actions are subject to revocation at the Ethics Committee's discretion at any time upon written notice, and shall cease, along with any indemnification outside of employment timeframes, immediately upon the Associate's cessation of employment with WSFS.

Whether service with another Organization is at the Corporation's request or approval, a WSFS Associate is not permitted to serve as director or officer of a Bank Client's business at the same time they or their direct report are responsible for managing the Client's Bank relationship. Any Associate who normally reports to an individual who is a director or officer of a Client's business shall, in respect of credit matters for such Client, report to another individual selected by the Executive Officer in charge of such business unit.
When an individual is serving as a director or officer of a non-WSFS Organization at the Corporation's request, all director's fees and other remuneration received for his or her service must be paid over to

the Corporation or applicable WSFS subsidiary. When the individual is serving with the Corporation's approval, such fees and other remuneration may be retained by the individual.

Exceptions:

Personal Businesses: WSFS Associates do not need to obtain prior approval to serve as an officer, director, or trustee or to hold a partnership or other ownership interest in an Immediate Family Member's business or real estate holding entity. However, in the event a business or banking relationship exists between the business and WSFS, or should such a relationship come into existence, the Associate must disclose their status in writing to the Ethics Committee.

Not-For-Profit Organizations: Unless indemnification is requested for such service, no approvals are required to serve as an officer, director, or trustee of a not-for-profit entity or community Organization. While approval of participation in community activities is not required unless there is a banking or business relationship between the Organization and WSFS, WSFS requires Associates list their positions with community Organizations on the "Code of Business Conduct and Ethics Policy Affirmation" form.

Equal Employment Opportunity; Prohibitions on Discrimination, Harassment and Retaliation

WSFS is an equal-opportunity employer. WSFS will not engage in or tolerate unlawful discrimination with regard to any employment decision, policy or practice based on a person's sex, gender, pregnancy (including childbirth, breastfeeding and related medical conditions), age, race, color, religion, creed, national origin, ancestry, citizenship, military status, veteran status, mental or physical disability, medical condition, genetic information, sexual orientation, gender identity or expression, or any other factor protected by applicable federal, state or local law. Please see WSFS' *Equal Employment Opportunity, Affirmative Action and Pay Transparency Policy* for additional information regarding WSFS' prohibition of unlawful discrimination.

WSFS also will not engage in or tolerate unlawful harassment or retaliation on account of a person's sex, gender, pregnancy (including childbirth, breastfeeding and related medical conditions), age, race, color, religion, creed, national origin, ancestry, citizenship, military status, veteran status, mental or physical disability, medical condition, genetic information, sexual orientation, gender identity or expression, or any other factor protected by applicable federal, state or local law. Please see WSFS' *Policy on Non-Harassment and Non-Retaliation* for additional information regarding WSFS' prohibition of unlawful harassment and retaliation.

Anyone who believes that they – or anyone else – may have been unlawfully discriminated against, harassed by or retaliated against or subject to any inappropriate conduct prohibited by WSFS's Equal Employment Opportunity, Affirmative Action and Pay Transparency Policy, or Policy on Non-Harassment and Non-Retaliation, should report their complaints immediately to their Human Resources Business Partner, the Chief Human Resources Officer, or the Chief Legal Officer. WSFS also has an Ethics, Accounting & Audit Hotline to which Associates can report complaints about unlawful discrimination, retaliation or harassment or other inappropriate conduct.

If you are an officer, manager, or supervisor and anyone complains to you that they believe that they or anyone else may have seen subject to unlawful discrimination, harassment or retaliation, you must report this immediately by contacting your Human Resources Business Partner or the Chief Human Resources Officer. If the complaint involves Human Resources, you must report this immediately to the Chief Risk Officer or Chief Legal Officer. You may neither keep the complaint confidential nor investigate the complaint on your own.

Any officer, manager, supervisor, other Associate, agent or non-employee who, after appropriate investigation, has been found to have engaged in unlawful discrimination, harassment or retaliation and/or inappropriate behavior inconsistent with WSFS's Equal Employment Opportunity, Affirmative Action and Pay Transparency Policy, or Policy on Non-Harassment and Non-Retaliation, will be subject to appropriate (immediate and proportionate) corrective action, up to and including termination of employment or other relationship with WSFS.

Other Ethical Matters

- **Data Security and Acceptable Use:** All data security and individual passwords are confidential and are not to be disclosed or shared with other Associates or third parties. Any defamatory, discriminatory or threatening content, or any other content that violates WSFS policy, is prohibited from e-mail messages, as well as any other WSFS computer or other communication systems. Downloading, uploading, and/or circulating games, jokes, chain mail, personal e-mail, and material of a sexual nature is not permitted. Any computer/internet use that is not business related should not conflict with any WSFS policy and should not be used in more than an incidental way. Associates are expected to adhere to WSFS' *Information Security Policy*. Please refer to this policy for complete details.

- **Proper and Accurate WSFS Books and Records:** It is WSFS' policy that all record keeping disclosure and accounting control requirements of the federal securities laws, the federal and state banking laws, and the Foreign Corrupt Practices Act are complied with. To achieve this, WSFS requires all books and records to be kept in a manner that fully and fairly reflects all WSFS receipts, expenditures, assets, and liabilities. Associates are expected to record all transactions involving such matters in accordance with WSFS' established internal control systems and Generally Accepted Accounting Principles. The responsibility for accurate and complete financial records does not rest solely with WSFS Accounting Associates. All Associates involved in approving transactions, supplying supporting information for transactions, and determining account classifications have responsibility for complying with WSFS policies.

WSFS policy prohibits the creation of false or misleading records, as well as the establishment of undisclosed or secret (off-book) funds or accounts for any purpose. Incentive gaming and aggressive, deceptive, unfair, or abusive sales practices are strictly prohibited. Associates may not manipulate records, open false accounts, falsify applications, forge signatures, or skew results in any way for their own benefit or for the benefit of another Associate. It is important that WSFS Associates and Directors understand and adhere to these requirements, as federal law imposes civil and criminal penalties on both individuals and companies who violate accurate recordkeeping and accounting laws. WSFS continues to emphasize fraud awareness to better protect our Clients and WSFS. We have a zero-tolerance policy and may seek prosecution against individuals and vendors/suppliers who commit fraud against the Company.

- **Fidelity Coverage**: Every Associate is covered by WSFS' fidelity bond. WSFS will not continue to employ anyone who ceases to be eligible for this coverage.
- **Dealings with Auditors, Examiners and Legal Counsel:** Associates shall comport themselves with honesty and integrity, and shall not attempt to improperly influence auditors, examiners, legal counsel (internal or external) or others in the course of their work.
- **Legal Advice and Litigation:** WSFS recognizes the exclusive authority of attorneys to practice law and to give legal advice. Associates (with the exception WSFS legal counsel) cannot practice law nor give legal advice. Therefore, extreme care must be exercised in discussions with Clients and Associates. Nothing should be said that might be interpreted as the giving of legal advice. In the event that a claim of any kind, including but not limited to litigation, is initiated, or threatened against WSFS, Associates or Directors should immediately notify our Chief Legal Officer/Legal Department, even if the action or threat appears to be without merit or insignificant.
- **Recommendations to Clients:** Associates, unless properly licensed to do so, are not to recommend attorneys, accountants, insurance brokers or agents, stockbrokers, real estate agents and the like to Clients unless, in every case, several names are given without indicating favoritism. Our Associates are encouraged to recommend Clients to WSFS subsidiaries and divisions, such as Cash Connect – ATM Division, NewLane Finance, WSFS Mortgage, Arrow Land Transfer; within the Bank and to our subsidiary companies, specifically to our Wealth Management businesses/related companies; and to entities with which WSFS has entered into a formal referral agreement. It is not necessary to refer to multiple asset management, insurance or investment advisers/brokers when referring to our own subsidiary companies and divisions.

ANTI-TRUST POLICY

General: It is WSFS' policy to compete vigorously but fairly for business. It is WSFS' policy to abide by applicable antitrust laws and regulations, which are intended to foster free and open competition. Antitrust restrictions apply to all areas of WSFS' business and are not limited to any particular operations. All Associates, Directors and Advisory Board Members should understand the seriousness of allegations of antitrust law violations, including the potential for criminal liability. Any questions concerning competition and the antitrust laws should be submitted to the Legal Department.

Prohibited Arrangements: Associates, Directors and Advisory Board Members are prohibited from engaging in any discussions, meetings, agreements, or understandings (express or implied) with personnel of another financial institution, competitor, or Organization for the purpose of setting or controlling prices, service charges, fees, interest rates, trade practices, or marketing policies.

Prohibited Products: Associates, Directors and Advisory Board Members are prohibited from forming tying relationships among products. These relationships utilize WSFS' market power in one product to require Clients to purchase an additional product with separate market demand and which the Client does not necessarily desire.

Associates, Directors and Advisory Board Members are free to borrow funds and engage in any other bona fide business transactions which do not violate antitrust or other laws and regulations, including those business transactions involving loans, interest bearing accounts, advertising, correspondent banks, other financial institutions or Organizations, or anything else mentioned above.

BANK BRIBERY ACT – *GIFTS, BEQUESTS AND GRATUITIES POLICY*

General Objectives

Business entertainment and small business gifts and gratuities can build goodwill and are a part of normal relationships with our business partners. However, gifts, bequests and gratuities can also create a perception of conflict of interest that can undermine the integrity of our business relationships and could be subject to potential abuse. Therefore, by nature of this policy we are attempting to prevent possible compromising situations through policy knowledge and acceptance of gifts, bequests and gratuities that may result in a conflict of interest. The objectives of this policy are to:

- Prohibit the solicitation or receipt of anything of value directly or indirectly from any third party in exchange for favorable treatment in connection with any transaction, business, service, or Confidential Information of WSFS.
- Detail appropriate circumstances in which gratuities (gifts, entertainment, etc.) may be accepted.
- Limit the value of such gifts, bequests, and gratuities.
- Establish procedures for disclosure of the receipt of gifts, bequests, and gratuities.
- Meet the provisions of the Bank Bribery Act.

Ethics Committee and Value Limitations (approval process)

Under the Bank Bribery Act (the "Act"), it is a federal crime for any WSFS Associate, Director or Advisory Board Member to corruptly solicit or demand for the benefit of any person or Organization, or accept, or agree to accept, anything of value from an individual or Organization with the intention of being influenced or rewarded in connection with business or transactions of WSFS.

Pursuant to the Act, WSFS Associates, Directors and Advisory Board Members are prohibited from:

- Soliciting anything of value from any Client, prospective Client, competitor, Vendor/ Supplier, individual, or any Organization, whether for themselves or a third party (other than WSFS itself), in exchange for WSFS business or Confidential Information; and
- Providing anything of value, including but not limited to favorable business terms or products, or the offer of employment or potential employment at WSFS, to any Client, prospective Client, competitor, Vendor/Supplier, individual, or any Organization, or any individual with a personal relationship to the foregoing in connection with WSFS business, either before or after business is discussed or consummated.

Permitted Gifts: Associates, Directors, and Advisory Board Members are permitted to accept the following:

- Gifts, gratuities, amenities, or favors based on family or personal relationships where it is clear from the circumstances that the motivating factor behind the gift is the family or personal relationship, not WSFS business,
- Meals, refreshments, entertainment, accommodations, or travel arrangements of reasonable value in the course of a meeting or similar occasion, the purpose of which is to hold bona fide business discussions or foster better business relations, provided that the expense would be treated as a

reasonable business expense paid for by WSFS and that WSFS can properly reciprocate in a like manner considering all relevant circumstances,

- Advertising or promotional materials of reasonable value, such as pens, pencils, note pads, key chains, calendars, and similar items,
- Discounts or rebates on merchandise or services that do not exceed those available to other Clients,
- Gifts of reasonable value that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, holiday, or birthday, provided that such expenses do not exceed five hundred dollars ($500), and
- Civic, charitable, educational, or religious Organization awards for recognition of service and accomplishment.

The Ethics Committee will review and approve all gifts in excess of $501 to $5,000. If it is determined that the value of a particular item exceeds $5,000, then this matter will be presented to the Executive Committee of the Board of Directors for approval. A detailed description of such gift(s) received should be reviewed by the Associates' immediate supervisor and divisional Executive Leadership Team member prior to submission to the Ethics Committee. If you are an Associate working in the Human Resources or Risk Departments, then another EVP will be selected ad hoc to review your situation pertaining to the acceptance of such gift. For gifts exceeding $500 received by members of the Ethics Committee or a Director, a detailed description should be provided to the Audit Committee for approval (with the impacted Director abstaining from discussion and voting). For gifts exceeding $500 received by Advisory Board Members, a detailed description should be provided to the Ethics Committee for approval.

At times, it can be difficult to determine the value of a gift, bequest, or gratuity. In these situations, Associates, Directors, Advisory Board Members should use their best judgment in assigning a value to the gift, bequest, or gratuity. If there is any question regarding the acceptability of a gift the Associate, Director, or Advisory Board Member should contact the Ethics Committee for guidance.

Regardless of the source or value of any gift or favor, WSFS Associates, Directors, Advisory Board Members, and their Immediate Family Members must decline any gift offered under circumstances that give the appearance of intending to influence, or which may actually influence or appear to influence, these individuals in performing their WSFS duties.

Cash gifts or gift cards of any amount are prohibited by the Code, as are gifts which would be viewed as lavish or expensive by a reasonable person. WSFS Associates, Directors and Advisory Board Members must also refuse any gifts of nominal value if they are part of a pattern or practice which, when viewed as a whole, could be considered lavish or expensive, for example, a pattern of very expensive meals or entertainment.

- **Benefits Not Permitted:** By contrast to the benefits permitted above, the following types of benefits are not permitted:
  - Expensive gifts (i.e., in excess of $5,000, unless special approval is granted via the review process noted above.

- Weekend entertainment events such as golf trips, spa trips, hunting or fishing trips, etc.
- Expensive or scarce athletic or entertainment tickets requiring travel outside the region and/or an overnight stay.

In some instances, an event may be allowable provided the event has some business elements (i.e., continuing professional education, roundtable business discussions, business development, etc.) and/or the entire cost of the event is not being paid by the Client or vendor. The acceptance of an invitation to such an event must be reviewed and approved in advance by the Ethics Committee.

- **Gift Giving:** Except where authorized by law, WSFS Associates, Directors, and Advisory Board Members are prohibited from directly or indirectly giving, offering, or promising any gift, bribe, kickback, favor, discount, price concession, loan, service, or anything else of value for the purposes of influencing another's actions. This prohibition applies to all dealings on WSFS' behalf, whether with an individual, Organization, foreign or domestic government, public official, official representative, political party, or otherwise. This prohibition is not intended to apply, however, to normal business practices (i.e., meals, entertainment, tickets to cultural and sporting events, promotional gifts, favors, discounts, price concessions, gifts given as a token of friendship or for a special occasion (such as a birthday, holiday, or graduation)), provided that the practice involves a nominal and reasonable value under the circumstances and promotes WSFS' legitimate business development.
- **Bequests, Devises or Benefits Under Wills and Trusts:** WSFS Associates and their Immediate Family Members are prohibited from accepting benefits pursuant to a Client's will or trust instrument, including bequests and devises, unless the Client is a relative of either the Associate, is an Immediate Family Member of the Associate, or the Associate has received approval from the Ethics Committee. Associates and Directors shall not, under any circumstances, demand, request, or solicit from a Client any bequest, devise, or other benefit under a will or trust instrument.

Except as set forth below, no Associate may act as a personal representative, executor, administrator, trustee, custodian, guardian or in any Fiduciary capacity under a will, trust, or other instrument unless:

- Ethics Committee Approval was obtained; and
- The Associate declines to accept any commissions or fees for so acting unless Ethics Committee approval authorizes otherwise.

The above prohibitions do not prohibit WSFS Associates and Directors, or their Immediate Family Members from acting as personal representative, executor, administrator, trustee, custodian, guardian in a Fiduciary capacity under a will, trust or other instrument established by an Associate or an Associate's Immediate Family Member or relative.

Associates, Directors, and their Immediate Family Members are not permitted to act with WSFS as a co-personal representative or co-trustee under a will, trust, or other instrument established by a WSFS Client unless they waive any commissions or fees for so acting, and Ethics Committee approval was obtained.

Disclosure Requirements

Any gifts, bequests or gratuities exceeding the values stated above received by any of our Associates, Directors, Advisory Board Members requires prompt disclosure to the Ethics Committee following disclosure to the Associate's immediate supervisor and divisional Executive Vice President. Directors and Advisory Board Members should direct their disclosure to the Ethics Committee. The disclosure should include the description of the gifts, bequests, or gratuities that exceed the above stated value limitations. Any receipt of gifts or gratuities that are received frequently or on a consistent basis regardless of total value should also be disclosed. For example: tickets to sporting events once or twice a month or for an entire season. Any gifts, bequests, or gratuities that are offered and not accepted because it may have a corrupting influence should also be disclosed.

Disclosure of the gift received should include the following information:

- Name of person giving the gift,
- Company affiliation,
- Nature of the relationship with the person and his/her Company,
- Nature of the gift,
- Value of the gift,
- Date of gift, and
- Circumstances surrounding the receipt of the gift.

Timing of Disclosure: The initial disclosure of any gift for which disclosure is required hereunder shall be made within thirty (30) days following the earlier of (a) receipt of the gift, or (b) notification to the recipient that the gift will be made.

Recordkeeping Requirements

All disclosures will be maintained by the Chief Human Resources Officer for a period of at least five (5) years.

Implementation and Administration of the Code

WSFS's Legal Department, in collaboration with Human Resources, is responsible for administering the Code. Copies of all correspondence and related documents concerning Code matters should be sent to the Chief Legal Officer, or his/her designee, for retention: Legal Department – 1818 Market Street, Philadelphia, PA 19103; or via email to the Ethics Committee

While difficult questions of judgment may arise when completing the questionnaire, any doubts should be resolved by disclosure. Notwithstanding the disclosure required by the annual affirmation, all WSFS Associates, Directors and Advisory Board Members are expected to promptly report the existence of any relationship or interest which may even appear to violate the Code and disclose and seek approval of any actions which raise questions about propriety.

Waiver

No part of this Code will be waived for any Director, Executive Officer or Senior Level Financial Officer except by vote of the Board of Directors, or its designated Committee. Should a Director, Executive Officer or Senior Level Financial Officer be granted a waiver, to the extent required by applicable securities laws or regulations, notice of the waiver must be disclosed within four business days of the grant either by filing a Form 8-K with the SEC or, if previously announced as a method for disclosure in WSFS's proxy statement, posting the information required by Form 8-K on the WSFS website. If WSFS chooses to post notice on the website, the notice will remain posted for 12 months and be retained thereafter in office as required by law or regulation.

Other Associates may be granted waivers for specific events upon receiving the written approval of the Ethics Committee. No other waivers of this Code are permitted.

Determination of Violations and Enforcement

The Board of Directors, or a designated Committee thereof, shall determine whether a violation has occurred, and if so, the resulting course of action for any Code violation by a Director, Executive Officer, Senior Level Financial Officer, or member of the Ethics Committee. The Ethics Committee shall determine whether a violation has occurred, and if so, the resulting course of action for any Code violation by other Associates and Advisory Board Members.

The resulting course of action for any Code violation must include written notice and be reasonably designed to deter wrongdoing and promote accountability for adherence to the Code. The written notice must advise the offender of the violation determination and the disciplinary action to be taken, whether censure, demotion, reassignment, suspension (with or without pay or benefits), or termination of employment/board status. In determining the appropriate action, all relevant information must be considered about the particular offender and specific violation(s). Relevant information includes, but is not limited to, the nature, severity, and frequency of the violation; the offender's state of mind, whether intentional or inadvertent; the offender's knowledge with respect to propriety of the conduct; and the offender's compliance history.

Amendment

The Ethics Committee shall have the authority to amend the Code (i) as necessary to ensure alignment with other WSFS policies and/or procedures, and (ii) to correct immaterial errors or make immaterial changes, provided that the amended Code is presented to the Governance and Nominating Committee of the Board of Directors at its first regularly scheduled meeting following such amendments. All other Code amendments are subject to the Governance and Nominating Committee's approval.

Affirmation

Annually, every Associate, Director and Advisory Board Member of WSFS is required to review the Code, and complete and sign the Code of Business Conduct and Ethics Affirmation.

NOTICE TO ASSOCIATES: This Code does not alter your "at will" employment relationship unless otherwise provided by law or you have a signed written agreement for continued employment. WSFS recognizes your right to resign at any time for any reason. Moreover, WSFS may terminate an employment relationship at any time for any lawful reason.

Terms used throughout this Code of Business Conduct and Ethics Policy:

1. *Agent.* Any company or individual that has been engaged by WSFS to provide various services to WSFS, such as (but not limited to) accounting services, data processing services, payroll services, legal services, and consulting services.

2. *Associate.* Any person employed by WSFS either full-time or part-time.

3. *Associates,' Directors,' and Advisory Board Member Acknowledgment.* Must be completed by every Associate, Director and Advisory Board Member upon beginning employment or service with WSFS, and on an annual basis thereafter, after reviewing this Code; acknowledges that signer has received and reviewed the Code; is presently in compliance with the Code; and agrees to comply with the Code going forward.

4. *Auditor.* WSFS' Chief Auditor

5. *Bank.* Wilmington Savings Fund Society, FSB

6. *Board of Directors.* The Board of Directors of the Corporation and the Bank.

7. *Business/Civic/Social/Charitable Organization.* American Bankers Association, Delaware and Pennsylvania Bankers Association, Delaware and Pennsylvania Association of Community Bankers, United Way, Chamber of Commerce, Junior League, Rotary, Lions, Kiwanis, neighborhood associations, school associations, investment clubs, discussion groups, religious organizations, and similar groups or entities.

8. *Code.* This Code of Business Conduct and Ethics.

9. *Confidential Information.* As defined on page 4 within this Code.

10. *Company Securities*. The Corporation's common stock, options to purchase common stock, preferred stock, convertible debentures, warrants, and any other type of securities that the Corporation may issue, as well as derivative securities not issued by the Corporation, for example, exchange-traded put or call options, or swaps.

11. *Corporation*. WSFS Financial Corporation.

12. *Director.* A director of any WSFS entity.

13. *Ethics Committee.* The Ethics Committee is comprised of: (i) the Executive Vice President – Chief Human Resources Officer, (ii) the Executive Vice President – Chief Risk Officer; and (iii) the Chief Legal Officer,. If one of the aforementioned positions is vacant or the individual is on a long- term

leave of absence, the Chairman, President & CEO or his/her designee will nominate an interim committee member. The Ethics Committee's email address is EthicsCommittee@wsfsbank.com.

14. *Executive Officer or Executive.* Identified annually by the Board of Directors, includes the Chairman, President & CEO of the Corporation or the Bank; any Executive or Senior Vice President in charge of a principal business unit, division, or function (such as sales, administration or finance); and any other Officers who perform policy making functions as defined in SEC Regulations.

15. *Fiduciary.* A situation involving a relationship of trust or special confidence.

16. *Immediate Family Member(s*). Includes a person's spouse, parents, stepparents, children, stepchildren, siblings, mothers and fathers-in-law, sons and daughters-in-law, and brothers and sisters-in-law, and anyone residing in such person's home (other than a tenant or employee).

17. *Insider Information.* Material information not available to the public that could be expected to affect a person's judgment in deciding whether to buy, sell, or hold securities.

18. *Legal Counsel*. Either WSFS's Chief Legal Officer or outside counsel designated by the Chief Legal Officer, whichever the context dictates.

19. *Officer.* An officer of a WSFS entity.

20. *Organization*. Any corporation, partnership, association, joint venture, club, society, trust, estate, limited liability company, cooperative, organization, association, government or political subdivision, or other entity, formal or otherwise.

21. *Related Interests.* Related Interests refers to any (1) company a person controls, or (2) political or campaign committee that a person controls, or the funds or services of which a person will benefit from.

22. *Related Party Transaction.* Any transaction, or series of similar transactions, that exceeds $120,000 and is between WSFS and any Director, Executive Officer, Director nominee, stockholder with over five percent ownership (whether held of record or beneficially owned), or Immediate Family Member of any of the foregoing. Related Party Transactions also include transactions in which the foregoing individuals have an indirect material interest, such as transactions between WSFS and an entity they own or control, or substantially own or control.

23. *SEC.* The United States Securities and Exchange Commission.

24. *Senior Level Financial Officer.* The Corporation's Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer or Treasurer; the Bank's Comptroller or Senior Vice President – Finance; or any person designated by the Board of Directors as performing similar functions.

25. *Senior Level Officer.* An Associate holding with either a Senior Vice President or Executive Vice President title.

26. *Senior Management.* WSFS Officer who holds the rank of Chairman, President & CEO, Executive Vice President or Senior Vice President.

27. *Senior Management Approval.* Approval, based on a request that is submitted to the Chief Legal Officer in writing, by both (1) the direct supervisor of the individual and (2) either the Senior Level Officer in charge of the business unit, or the Chairman, President & Chief Executive Officer of the Bank.

28. *Vendors/Suppliers.* Any person or Organization supplying goods, products, services, or consulting advice (legal, accounting, or any other type) to WSFS or any WSFS Official in his/her official capacity.

29. *WSFS.* WSFS Financial Corporation, Wilmington Savings Fund Society, FSB and all direct and indirect subsidiaries and affiliates thereof.

CODE OF BUSINESS CONDUCT AND ETHICS AFFIRMATION

Please note, the below information must be provided even if disclosed on prior affirmations

I have reviewed a copy of WSFS Financial Corporation Code of Business Conduct and Ethics (the "Code"). I certify that I have read the Code, that I am presently in compliance with the Code, and agree to comply with the Code in the future. I am aware that I may request a complete copy of this Code through Human Resources. Additionally, I am aware that a copy is available for inspection on WSFS's website at www.wsfsbank.com . I hereby affirm that:

1. Neither I nor, to the best of my knowledge, any Immediate Family Members have:
   a. Made, or advised anyone else to make, any investment based on Insider Information or otherwise acted on Insider Information contrary to the Code;
   b. Given or accepted any gift, fee, commission, favor, entertainment, discount, price concession, loan, service, or anything else of value to or from a Client, prospective Client or supplier of WSFS, other than as permitted by the Code;
   c. Sold assets to or purchased assets from a WSFS Client other than as permitted by the Code; or
   d. Accepted any bequest, devise, or any other benefit or fiduciary appointment, other than as permitted by the Code, except as follows:

   ____

   ____

2. I do not presently hold a position as director, officer, partner, or other official position in any business or professional enterprise, community organization, except as follows:

   NOTE: If reporting information, please provide the following details:

   - Name and address of corporation or firm,
   - Description or purpose of the business of the company,
   - Whether the business is publicly or privately traded,
   - Official capacity,
   - Percent of ownership or interest,
   - Income or fees in the past 12 months,
   - Indemnification provided,
   - Whether you are representing WSFS in an official capacity,
   - Whether you have received prior authorization or waiver for such participation and the year it was received. Board/Director appointment in a community organization should also be listed as well. If more space is needed, please use the reverse side of this form.

____

3. I am not presently engaged in any other outside business activity, nor do I have any other outside employment, except as follows:

Business Activity Capacity of Work	Hours and Compensation	Length of Employment

4. Neither I nor, to the best of my knowledge, any Immediate Family Member is an authorized signer on deposit accounts (other than my personal account, or accounts of my Immediate Family Member) at WSFS or any organization or any other bank, savings and loan association, brokerage, or other institution except as follows: (List: Name of the Organization; Name of Financial Interest or Arrangement; Signature Authority – either Yes or No; Note the Type of Account; Title of Account (owner) and Name of Bank / Financial Institution and list whether you receive Compensation or Reimbursement of Expense.

5. Neither I nor, to the best of my knowledge, any Immediate Family is engaged in any activity which may reasonably be deemed a conflict of interest under this Code except as follows:

6. **For WSFS' Chief Executive Officer and Members of the Executive Leadership Team Only**: I have not made any monetary or in-kind contributions to political or governmental activities, other than as follows:

____

____

I affirm that the above information is correct.

Date:________________________ Signature:_
Name (print):_______________________________

To be completed by WSFS Associates:

Department, Branch, or Subsidiary: __________
Unit # ____________________________________

NOTE: You will be notified by the Ethics Committee if further information/discussion is needed regarding any of the above information. If you are not contacted by the Ethics Committee, you may assume that any activities, etc., listed above are acceptable.