



Description of Code of Ethics Amendments

Effective date: February 6, 2026

On February 3, 2026, the Board of Directors of First Citizens BancShares, Inc. ("BancShares" and, together with its subsidiaries, the "Company") approved an amended Code of Ethics (the "Code"), dated February 6, 2026, applicable to BancShares directors and Company associates, including BancShares' principal executive officer, principal financial officer and principal accounting officer. Among other things, the updates included:

- Adding sections on "Risk Management," "Human Rights," "Making Ethical Decisions," "First Citizens Bank Brand," and "Anti-Corruption Requirements."
- Condensing, clarifying or simplifying content or eliminating duplication with other Company governance documents, including in the following sections: "Federal Criminal Laws," "Confidential Supervisory Information," "Communications with the Media and the Public," and "Gifts and Entertainment."
- Updating content for changes in laws or compliance and monitoring requirements or procedures, including in the following sections: "Safe Workplace," "Other Criminal, Dishonest or Fraudulent Acts, and Arrests," "Confidentiality and Privacy of Information," "Marketing and Advertising," "Insider Trading and Material Non-Public Information," "Management of Personal Finances and Investments," "Using Position for Personal Gain," "Activities Detrimental to the First Citizens' Business," and "Conducting Banking Transactions for Self, Family, or Close Personal Relationship."
- Making certain other technical and administrative revisions and clarifications, including to reflect certain non-U.S. operations.

The above summary of the consolidation and update of the Code is qualified in its entirety by reference to the full text of the Code.