

Steele Bancorp, Inc.
Central Penn Bank & Trust

FINANCIAL REPORTING CODE OF CONDUCT AND ETHICS

Steele Bancorp, Inc. and its subsidiary, Central Penn Bank & Trust, take pride in maintaining the highest ethical standards, and we believe that our employees, officers, and directors are aware of, and share, this commitment. This Code of Conduct and Ethics provides our employees, officers and directors with additional guidance and support for ensuring that we maintain a consistent vision and commitment to a culture of uncompromising honesty and integrity throughout our organization.

1. Applicability.

1.1. This Code of Conduct and Ethics applies to all of our employees, officers, President and Chief Executive Officer, Chief Financial Officer, and directors without exception. (Each employee, officer and director of Central Penn Bank & Trust is referred to in this Code as a “covered person.”) This Code governs the actions and working relationships of each covered person with current and potential customers, co-workers, government agencies, media, stock exchange and stockholders. Each covered person should become familiar with this Code, adhere to the standards and restrictions set forth in this Code, and conduct himself or herself in accordance with this Code in order to avoid even the appearance of impropriety.

1.2. Some of the words and phrases in this Code may be subject to different interpretations, or it may appear that one ethical principle conflicts with another, in certain situations. If you are unsure of the appropriate action, discuss the matter with an appropriate member of management, such as your manager, a member of senior management or the Company’s Chief Risk Officer.

1.3. This Code does not cover all of the Company’s policies, but supplements other policies set forth in our employee handbook. Each covered person is expected to comply with all of the Company’s policies. The fact that particular conduct is not mentioned in this Code of Ethics does not prevent it from being viewed as violating this Code of Conduct and Ethics.

2. Compliance with Laws, Rules and Regulations.

2.1. Covered persons are expected to obey, and ensure that the Company obeys, all applicable laws, rules and regulations of the United States and other countries, and the states, counties, cities and other jurisdictions in which we conduct business. This is true even if your manager or anyone in management has directed otherwise.

2.2. While you are not expected to know the full details of all of the laws, rules and regulations that you and the company must adhere to, some examples of the types of laws that the Company is subject to include laws requiring the company and its employees to:

2.2.1. Maintain a workplace that is free from discrimination or harassment based on race, gender, age, religion or other characteristic that is unrelated to the Company’s interests or otherwise protected by law;

2.2.2. Comply with applicable environmental, health and safety standards;

2.2.3. Support fair competition and laws prohibiting restraints of trade and other unfair trade practices;

2.2.4. Prohibit improper or other questionable payments (including bribes or kickbacks), gifts, favors or other gratuities to suppliers, customers, government officials or other third parties; and

2.2.5. Comply with all applicable federal and state securities laws, including laws prohibiting insider trading. (Covered persons are referred to the Company's Chief Financial Officer for further information regarding this issue.)

2.3. If a law, rule or regulation conflicts with a policy in this Code, you should comply with the law. If a local custom conflicts with this Code, you must comply with this Code.

2.4. If you are unsure about the legal course of action, you should request guidance from your manager or other member of management.

3. Conflicts of Interest

3.1. Each covered person should avoid any situation that might lead to a real or apparent conflict of interest between your self-interest and your duties and responsibilities as an employee, officer or director of the Company. A conflict of interest exists whenever your self-interest is inconsistent, or appears to be inconsistent in any way, with the interests of the Company or its customer relationships.

3.2. For purposes of this policy, your self-interest does include Companies in which you have an ownership capacity, governmental positions in which you have a leadership capacity, and other community organizations in which you have a leadership capacity.

3.3. Although the following list is not exhaustive, some examples of situations in which a conflict of interest may arise are as follows:

3.3.1. When a covered person takes actions or has interests that make it difficult to perform work for the Company objectively and effectively.

3.3.2. When a covered person receives improper personal benefits as a result of the person's position with the Company.

3.3.3. When the Company makes a loan to a covered person or guarantees an obligation of a covered person.

3.3.4. When a covered person uses corporate property or nonpublic information gained in his or her employment with the Company for his or her own advantage.

3.3.5. When a covered person competes with the Company.

3.3.6. When a covered person engages in activity that may reasonably be anticipated to jeopardize customer relationships. This may include running for or holding certain

political offices, visible participation in controversial public interest groups and personal activities that may otherwise be considered adverse to the best interests of the Company or its customers.

3.4. Any such conflict of interest may also arise as a result of actions taken to manage the interests of spouse, parent, child, brother or sister of a covered person.

3.5. While serving in a community, governmental or judicial leadership position, a covered person is responsible to comply with all conflicts of interest laws, codes, policies, rules, requirements and regulations applicable to such position, and to recuse himself or herself from matters involving a conflict of interest as and when required by such laws, codes, policies, rules, requirements and regulations.

3.5.1. While serving in a community, governmental or judicial leadership position, no covered person shall take action to affirm the granting of business to the Company, or deny business to a competitor. It is the Company's policy to require the covered person to abstain from voting on such transactions. In addition, covered persons should ensure that any abstention is well documented in the minutes of the community, governmental or judicial party.

3.6. A covered person who is a director is responsible to fully disclose and provide notice of a conflict of interest or potential conflict of interest to the Board Chair and the Chair of the Audit Committee, and to recuse himself or herself from the Board's consideration of such matters.

4. Confidentiality.

4.1. Nonpublic information regarding the Company, its businesses, employees, officers, directors, customers or suppliers is confidential. As an employee, officer or director of the Company you are trusted with such confidential information. You are only to use such confidential information for the business purposes of the Company for which they were intended. Confidential information should not be shared with anyone outside the Company, including family or friends, or other employees who do not need the information to carry out their duties, except when disclosure is authorized by your President or legally mandated.

4.2. Communications about the Company, its businesses, employees, officers, directors, customers or suppliers with the media, stockholders, or other members of the public must be approved in advance by the President.

5. Fair Dealing.

5.1. We seek to outperform our competition fairly and honestly and seek competitive advantages through superior performance of the members of our team. Each covered person is expected to deal fairly with the Company's customers, suppliers, competitors and employees. Stealing proprietary information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. No one should take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice

6. Protection and Proper Use of Company Property.

6.1. All covered persons should seek to protect and preserve the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All assets of the Company should be used only for legitimate business purposes.

7. Public Company Reporting: Whistleblower Procedures

7.1. Because of the importance of this issue, the Audit Committee of the Board of Directors has been charged with responsibility for ensuring that every employee has a means of reporting, anonymously and confidentially, any concerns about the manner in which the Company's financial statements or public reports are prepared, the sufficiency of its internal financial controls, the honesty or competence of its financial management or independent auditors or any other matter regarding any accounting or auditing matters. Procedures for such reporting are set forth in the Company's Whistleblower Policy that is part of the Employee Handbook. We will not tolerate retaliation against any person who reports potential issues to the Audit Committee in good faith.

8. Covering Up Mistakes; Falsifying Records; Retention of Business Records.

8.1. Falsification of any Company, customer or third party record is prohibited. Mistakes should not be covered up, but should be immediately and fully disclosed and corrected.

8.2. Company records must be maintained for the periods specified by management. Records may be destroyed only at the expiration of the pertinent period. In no case may documents involved in a pending or threatened litigation, government inquiry or under subpoena or other information request, be discarded or destroyed, regardless of the periods specified by management. In addition, you should never destroy, alter, or conceal any record or otherwise impeded any official proceeding or investigation, either personally, in conjunction with, or by attempting to influence another person.

8.3. In the event of litigation, government inquiry or investigation, we will designate a member of management that you should consult with to determine whether records should be produced.

9. Reporting of Illegal or Unethical Behavior.

9.1. Covered persons have a duty to adhere to this Code and all other Company policies and to report any suspected violations of this Code or any other illegal or unethical behavior to, or when in doubt to consult with, your manager or the Compliance Officer. If you do not believe that talking to your manager is appropriate, or if doing so does not result in a response with which you are comfortable, then you should discuss the matter with another member of management, or in the case of accounting or auditing issues, a member of the Audit Committee of the Board of Directors.

9.2. If asked, the Company will keep your name confidential unless this would violate applicable law or our responsibilities to others or make adequate investigation of the matter impracticable.

10. Protection Against Retribution.

10.1. The Company will not tolerate retaliation against anyone who reports a violation or possible violation of this Code in good faith. Any person who takes any action whatsoever in retaliation against any employee who has in good faith raised any question or concern about compliance with this Code will be subject to serious sanctions, which may include termination.

11. Administration and Waiver of Code of Conduct and Ethics.

11.1. This Code of Conduct and Ethics shall be administered and enforced by the Human Resources Department. Any questions and further information regarding this Code of Ethics should be directed to the Chief Risk Officer.

11.2. Appropriate disciplinary penalties for violations of this Code may include counseling, reprimand, warning, suspension (with or without pay), demotion, salary reduction and termination of employment.

11.3. The Human Resources Department will be responsible for affirming compliance with this Code of Conduct and Ethics by all covered persons. Each covered person will be required to sign a certificate that he or she has read and understands the provision of this code annually as well as disclose all self-interest as defined in Section 3 of this policy.

12. Waivers.

12.1. Covered persons are expected to follow this Code at all times. Generally, there should be no waivers to this Code of Conduct and Ethics, however, in rare circumstances conflicts may arise that necessitate waivers. Waivers will be determined on a case-by-case basis by the Human Resources Department with the advice of senior management and/or the Audit Committee as appropriate; provided, however, that waivers for directors and executive officers may be determined only by the Board of Directors who shall have the sole and absolute discretionary authority to approve any deviation or waiver from this Code of Ethics with respect to any director or executive officer. Any waiver, and the grounds for such waiver, approved by the Board of Directors with respect to any director or executive officer shall be promptly disclosed to stockholders, not later than in the Company's next periodic report.

Approved by Board of Directors March 30, 2026