

ABOUT ETHICSPPOINT

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees with working together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why does Wintrust have a system like EthicsPoint?

- We believe our employees and customers are our most important assets. By creating open channels of communication, we can promote a positive work environment, maximize productivity, and ensure positive and fruitful customer experiences.
- Publicly-traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- As an organization that values responsibility and integrity, we want to provide our customers with a channel to let us know if they believe we have crossed any ethical line.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

REPORTING

May I report using either the internet or telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via telephone or internet.

What type of situations should I report?

The EthicsPoint system is designed for our employees and customers to report any violation of our stated code of conduct or other concerns they may have.

As an employee, if I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns to your direct manager or other member of our management team. We recognize, however, there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

As a customer, if I see a violation or have a concern, shouldn't I just report it to the local branch manager, account manager, or leadership?

When you observe behavior you believe violates our code of conduct, we'd appreciate it if you let us know. Ideally, this should be a complaint made locally, but we understand that can be uncomfortable or potentially intimidating. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

As a Wintrust employee, you have the right to work in a positive environment, and with that right comes the responsibility of acting in an ethical manner and reporting when someone is not acting appropriately.

By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

As a Wintrust customer, you've come to expect us to behave a certain way. As an ethical customer and community-focused financial services company, we may occasionally need your help to ensure we stay on track. By reporting any issues, you help make Wintrust and the local financial services industry better.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in our company—both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company, our employees, our customers, and our communities.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy and allows us to assure a safe, secure, and ethical environment. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace, and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

REPORTING SECURITY & CONFIDENTIALITY

As a Wintrust employee, it is my understanding any report I send from a company computer generates a server log that shows every website my PC connects with. Won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses. So, no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12 percent of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any internet portal will remain secure and anonymous. An internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away internet addresses so that total anonymity is maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I'm concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you need to ensure the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..." or "my neighbors here on Main Street".

Is the telephone toll-free hotline confidential and anonymous, too?

Yes. You will be asked to provide the same information you would provide in an internet-based report, and an interviewer will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

TIPS & BEST PRACTICES

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

All unethical conduct, at any level, ultimately hurts the company, all employees, our customers, and our communities. This includes you. You only have to consider what has happened in recent corporate scandals to see the disastrous effects a seemingly harmless lapse in ethics can have on an otherwise healthy company, industry, or community. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself, your neighbors, and your coworkers to report it. Choose to be part of the solution, not to ignore a problem.

I am not sure if what I have observed or heard is a violation of company policy or involves unethical conduct, but it just doesn't look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if my banker, loan officer, financial advisor, or relationship manager committed the violation? Won't they get the report and start a cover-up or deny it?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. The named parties are not involved in investigations.

What if I remember something important about the incident after I file the report? Or, what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint call center, you receive a unique username and are asked to choose a password. You can return to the EthicsPoint system again either by internet or telephone and access the original report to add more detail, answer questions posed by a company representative, or add further information that will help resolve open issues.

We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the internet?

You can file an EthicsPoint report from any computer that can access the internet. Many public locations, including the public library, have internet-capable computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.