

HUMAN AND WORKFORCE RIGHTS POLICY

A. POLICY STATEMENT

At First Merchants Corporation and First Merchants Bank (hereinafter jointly referred to as “we” and “our”), are committed to respecting all internationally recognized human rights and our management policies and ongoing procedures cover the breadth of these rights, principles, and related issues. Our approach to human rights starts with understanding how our products, business activities, and operations may impact our employees and other stakeholders, both positively and negatively. We focus on the human rights issues that are most salient to our business.

B. OVERVIEW

Human rights are the basic standards of treatment to which all people are entitled, without regard to differences such as race, national origin, gender, or economic status. We recognize that there are human rights issues, such as racial disparities and gender inequality, which affect our communities and the world as a whole. We support fundamental human rights and demonstrate leadership in responsible workplace practices throughout our organization. In addition, we promote a safe and healthy workplace where all employees are valued for who they are and inspired to be the best they can be.

The Human and Workforce Rights Policy will be reviewed and approved each calendar year by the Board of Directors and appropriate committee of the Board.

C. DIVERSITY AND RESPECTFUL TREATMENT OF OTHERS

We are committed to maintaining an environment where all individuals are treated with dignity and respect. We require all of our employees, officers, and directors to interact fairly and respectfully with current and potential clients, suppliers, visitors, and other employees without regard to race, religion, gender, national origin, ethnicity, age, sexual orientation, gender identity, gender expression, or any other characteristic protected by law. We value diversity and provide training related to the elimination of bias and other standards designed to maintain a healthy work environment. Managers are expected to create and maintain an environment free of harassment and discrimination.

We recognize that some people may be at greater risk of negative human rights impacts due to their historic vulnerability or marginalization. In particular, we recognize the potential risk related to women, minorities, and individuals who belong to other protected classes. We have an Affirmative Action Plan and strive for compliance with all related laws and executive orders. We have adopted formal processes to protect all our employees (including women, minorities, and individuals in other protected classes) against harassment and discrimination. Any person who believes that an act of harassment or discrimination has occurred must immediately report the incident to Human Resources or

may be anonymously reported through the Company's Hotline. Employees who violate laws or our policies regarding fairness and respectful treatment of others may be subject to disciplinary action, up to and including termination.

Our commitment to human rights is guided by the principles of equal employment opportunity consistent with applicable federal, state, and local laws. We seek to offer a fair and competitive compensation program that will attract, retain, and reward high-performing employees at all levels. We strive for full compliance with applicable federal and state wage and hour laws including equal pay practices. We also promote training and career development to support our employees in achieving their professional goals and career aspirations.

It is our social responsibility to safeguard the privacy of our customers' information. To that end, we have developed and implemented comprehensive information security practices to protect our customers.

Our commitment to human rights is also embodied in our Code of Conduct, as well as our other policies that provide for nondiscrimination, non-retaliation, pay equity, health and safety, and related standards of fairness. These standards apply to all aspects of our operations. We regularly seek to enhance our approach to respecting human rights through engagement with diverse constituencies including, but not limited to, employees, customers, and the communities we serve. We remain steadfast in our commitment to identify these issues and take appropriate actions to potential human rights risks.

D. Protection of Health and Safety

We promote a culture of safety and supporting practices, policies, and procedures. We are committed to maintaining a safe environment in compliance with the Occupational Safety and Health Act. In addition to comprehensive medical plans, leaves of absence and disability programs, we provide physical and financial wellness programs and safety training to all employees.

E. Fair Labor Practices

We have no tolerance for child or forced labor and will comply with applicable labor laws relating to wage rates, work hours, freedom of association and conditions of employment.

F. Reporting Concerns and Issues

Any employee with questions or concerns about the Bank's commitment to human and workplace rights is encouraged to bring these issues to the attention of the Human Resources Department. Employees are encouraged to make reports without fear of

reprisal. Retaliation in violation of this policy will result in disciplinary action. In addition, an employee may make an anonymous complaint with a third-party vendor.

G. Communities

Giving back to our communities is one of the core values practiced by our employees. We take great pride in investing our time and financial resources in our communities so that we may all grow and prosper. We also strive to continually improve our business process to ensure that our operations have the least possible impact on the environment, protecting and preserving natural resources for future generations.