

CAPITAL CITY BANK GROUP, INC.
WHISTLEBLOWER POLICY

This Policy is applicable to Capital City Bank Group, Inc. (the “Company”). The Company is committed to the highest standards of moral and ethical behavior and has adopted this Policy to encourage compliance with, and prevent possible violations of laws, rules, and regulations in all activities of the Company and to provide a means whereby employees can safely report to the Company alleged or suspected violations without fear of retaliation or reprisal. The Company is committed to handling reports of violations effectively and expediently. . To that end, employees should initially report issues concerning suspected violations by following the procedures outlined in this Policy. This will enable the Company to undertake an investigation and remedy, if necessary, reports of alleged or suspected violations. .

Nothing in this Policy is intended to or shall limit an employee’s ability to:

- communicate with any federal, state or local regulatory body;
- participate in any investigation or proceeding that may be conducted by any federal, state or local regulatory body; or
- provide documents or other information to a federal, state or local regulatory body.

1. Policy Statement

Employees are required to abide by Company policy in an ethical manner and strictly comply with all federal, state, and local laws, rules, and regulations. Employee are expected to report suspected or believed wrongful conduct to the Company. No Company employee may interfere with the good faith reporting of a suspected or actual wrongful conduct.

It is the responsibility of Company employees to report known or suspected violations or any perceived wrongful conduct and to provide full cooperation to ensure a timely and thorough investigation. Employees found to have knowledge of violations or wrongful conduct, or to have intentionally submitted a report in bad faith, may be subject to disciplinary action. Employees who interfere with the good faith reporting of a violation or wrongful conduct or engage in any type of retaliation against an individual who makes such a report may be subject to disciplinary action.

2. Reporting Alleged Violations or Concerns

If an employee has knowledge of or reasonably believes that a violation of a law, rule or regulation relating to the Company’s securities, accounting, internal accounting controls, corporate reporting, or auditing or financial disclosure matters (“Legal Matters”), or any other Company activity, may have occurred, is ongoing, or may occur in the future, the employee should immediately report the possible violation to his or her immediate supervisor or via the Company’s contracted outside vendor, NAVEX Global, using the toll-free number of 844.927.2236.

Employees who make a report in good faith will be protected against retaliation for making such a report. The Company will endeavor to maintain the confidentiality to the extent possible or practical of all reports submitted by an employee regarding an alleged or believed violation. Reports should provide as much specific information as possible to allow for proper assessment of the suspected or believed violation. The report describing an alleged violation or concern should be candid and set forth all of the information that the employee knows or believes regarding the allegation or concern. In addition, all reports should, to the extent possible, contain corroborating information to support the commencement of an investigation. The Company takes all reports of alleged violations very seriously.

Once a report is received, the Company's Internal Audit Manager is responsible for determining whether a reasonable basis exists for a formal investigation by the Audit Committee. The Company's Internal Audit Manager may conduct an initial, informal inquiry that may seek the assistance or cooperation of the employee making the report.

To the extent possible or practical, the Company and the Internal Audit Manager will endeavor to treat reports in a confidential manner, except as necessary under the circumstances to facilitate the investigation and necessary remedial action. In no event will information concerning the report be released to persons without specific need to know. The resultant determination by the Internal Audit Manager will be communicated to the Audit Committee and to relevant Company management, as appropriate.

3. No Retaliation for Submitting Reports, Providing Information or Participating in Investigation

The Company will not tolerate any retaliation, harassment, or adverse action against an employee who: (a) discloses or threatens to disclose information, in writing, regarding any conduct that the employee reasonably and in good faith believes may constitute a violation of a law, rule, or regulation relating to any the activities of the Company, even if after investigation the Company determines that there has not been a violation; (b) participates in or otherwise assists with a proceeding relating to potential violations of a law, rule, or regulation relating to the activities of the Company or its employees; or (c) objects to or refuses to participate in any activity, policy or practice of the Company which is in violation of a law, rule, or regulation. If any employee has been subject to conduct that the employee reasonably believes to be retaliation in violation of this policy, the employee shall immediately report the alleged retaliation to the Company's human resources department or NAVEX Global. Protections against retaliation for making a report does not include immunity for personal wrongdoing, by the employee making the report, that forms the subject of the report and any subsequent investigation.

No employee will be subject to retaliation or liability under any federal or state trade secret law for the disclosure of a trade secret that is (a) made in confidence to a federal, state, or local governmental official or to an attorney, provided that such disclosure is made solely for the purpose of making a report or participating in an investigation of a suspected violation of law, or (b) made in a complaint or other document filed in a lawsuit or other proceeding, provided that such filing is made under seal. The Company reserves the right to pursue all remedies available under federal and state law for any disclosure of a trade secret by an employee which does not comply with this provision.

4. Retention of Reports and Documents

All reports submitted by an employee, all written statements, and applicable documentation of the results of any investigations relating thereto, shall be retained by the Company for a minimum of seven years. It is against the Company's policy to prematurely destroy any corporate audit records that may be subject to or related to an investigation by the Company or any federal, state or regulatory body.

Date of Last Audit Committee Approval:

February 26, 2025

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