

Summary of Recent Amendments to Code of Business Conduct and Ethics

The Board of Directors (the “Board”) of Bank OZK (the “Company”) approved and adopted amendments to the Company’s Code of Business Conduct and Ethics (the “Code”), effective as of May 16, 2022, to further describe the approval and disclosure process for waivers of the Code applicable to executive officers and directors, modify the processes for other approvals required by the Code, and make other clarifying revisions.

The Board approved and adopted amendments to the Code, effective as of August 15, 2022, to modify the guidance for investment officers that execute trades on behalf of the Company.

The Board approved and adopted amendments to the Code, effective as of May 8, 2023, to update the various resources available for guidance and reporting related to the Code, enhance the supervisor and third-party sections of the Code, and make other clarifying revisions.