

REGARDING THE RESOLUTION OF REPORTS ON THE COMPANY'S ACCOUNTING, INTERNAL CONTROLS, AND OTHER BUSINESS PRACTICES

General Policy Statement

Independent Bank Corporation (the “Company”) is committed to fostering a workplace conducive to open communication regarding the Company's business practices and to protecting employees from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct. In an effort to further this commitment, this policy: (i) establishes guidance for the receipt, retention, and treatment of reports received by the Company regarding accounting, internal controls, auditing matters, fraud and unethical business practices, whether submitted by Company employees or third parties; (ii) establishes guidance for providing Company employees a means to make these reports in a confidential and anonymous manner; and (iii) makes clear the Company's intention to discipline, including termination of employment, any person determined to have engaged in retaliatory behavior.

Receipt

This policy and the attached notice regarding Problem Resolution Resources and the availability of the Whistleblower Hotline shall be provided to the Company's employees and made generally available through the Company's Employee Handbook and Intranet. The Company has designated the Senior Vice President, Director of Internal Audit who shall be the final recipient of all the reports filed under this policy and who shall coordinate any necessary Company action. Any report received by a Company officer, director, or employee from a non-Company employee should be immediately forwarded to the Senior Vice President, Director of Internal Audit.

Retention

Reports filed under this policy will be controlled and documented by the Senior Vice President, Director of Internal Audit. The Senior Vice President, Director of Internal Audit shall maintain all related documentation for six years. All related documentation should be maintained in secured files to which only the Senior Vice President, Director of Internal Audit and the Audit Committee members shall have full access.

Treatment of Reports

All reports will be taken seriously and addressed promptly, discreetly and professionally. Should an employee desire to remain anonymous, that desire will be respected. Discussions and documentation regarding reports will be kept in strict confidence to the extent appropriate or permitted by policy or law. Should the employee identify himself or herself, the Senior Vice President, Director of Internal Audit will communicate to the employee the steps to be taken to address the report and the results of any Company actions initiated. This confidential report process may be used either to submit a new report, or to address an employee's previous report, which such employee does not feel was adequately resolved.

Independent Bank Corporation

Prepared By:	Independent Bank Corporation (Whistleblower Policy)
Approved By:	Board of Directors
Last Prior Revision Date:	June 22, 2021
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Retaliation

Retaliation against any employee that files a report or voices a concern under this policy is strictly prohibited. Employees determined to have engaged in retaliatory behavior may be subject to discipline, which could include termination of employment. Any employee who feels that he or she has been subjected to any behavior that violates this policy should immediately report such behavior to his or her Supervisor, the Senior Vice President, Director of Internal Audit, or the Senior Vice President, Chief HR Officer. Please note however, that employees who knowingly file misleading or false reports, or without a reasonable belief as to truth or accuracy, will not be protected by this policy and may be subject to discipline, including termination of employment. Employees also should be aware of their responsibilities regarding the confidentiality of Company information as outlined in the Confidentiality Agreement contained in the Company's Employee Handbook.

Audit Committee Review of Reports

A summary of reports received by the Senior Vice President, Director of Internal Audit will be communicated to the Audit Committee on a quarterly basis (or a more frequent basis should conditions warrant more timely action). All members of the Audit Committee will receive e-mail alerts directly from Intrado for all voicemail or web forms received through the Whistleblower Hotline which must be forwarded to the Senior Vice President, Director of Internal Audit

Exhibit A

Notification of Problem Resolution Resources

The Company has established, through Intrado (formerly West Corporation, a Nasdaq partner), a Whistleblower Hotline, a means for you to submit confidential, anonymous reports regarding accounting, internal controls, auditing matters, fraud and unethical business practices. The Whistleblower Hotline allows reports to be submitted by telephone, or through a secure Internet site. Intrado is a completely independent third-party that protects the anonymity of any individual making a complaint.

Never hesitate to ask a question or report a concern. Generally, your most immediate resource for questions or concerns is your Supervisor. Your Supervisor may have the information you need, or may be able to refer the question to another party.

There may, however, be times when you prefer not to go to your Supervisor, and may want confidential advice. You may want more information than your Supervisor can provide you, or you may want to report a concern about your Supervisor's conduct. In these cases, it is appropriate to call the Senior Vice President, Director of Internal Audit or use the Whistleblower Hotline. Both the Internal Audit Department and the Whistleblower Hotline give you a vehicle to communicate your concern on an anonymous basis, if you choose to maintain your anonymity.

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Communications should be specific, identifying, as best possible, names, dates, places, the conduct involved, the employee's perception of why the conduct may be a problem, and what recommendations, if any, the employee would make to rectify the situation, as well as any other pertinent information.

When you contact the Internal Audit Department or use the Whistleblower Hotline, you can expect the following:

- Your report will be taken seriously;
- Your right to remain anonymous will be respected, although you are encouraged to identify yourself;
- Your request for information or action will be handled promptly, discreetly and professionally; however a direct response should not be anticipated;
- Discussions and inquiries will be kept in strict confidence to the extent appropriate or permitted by policy or law;
- Our Compliance and Security Officer, outside legal counsel and the Senior Vice President, Chief HR Officer will become involved in the process as appropriate;
- Should you identify yourself, the Senior Vice President, Director of Internal Audit will communicate the steps to be taken to address the complaint and the results of any follow-up actions initiated.

CONTACT INFORMATION

- 1) To speak directly with the Company's Senior Vice President, Director of Internal Audit, call (616) 447-3914 ext. 43914 and leave a voice mail message. (Note: This is a secure extension that can only be accessed by the Senior Vice President, Director of Internal Audit).
- 2) Follow the attached procedures to contact the Whistleblower Hotline.
- 3) To send a letter, write to:

Independent Bank Corporation
Attention: Kimberly Martin, Senior Vice President, Director of Internal Audit
4200 East Beltline Avenue
Grand Rapids, Michigan 49525

NOTE: Should you have a complaint regarding the Senior Vice President, Director of Internal Audit, please contact your Supervisor or contact our Audit Committee Chairperson, Stephen L. Gulis at (616) 340-0686 or our Company Legal Counsel, Michael Wooldridge at (616) 336-6903.

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WHISTLEBLOWER HOTLINE PROCEDURES

Understanding and acting upon any issues that exist regarding financial, accounting and/or audit matters is an essential component to our ability to take action and ensure the highest levels of financial fidelity.

Your message, delivered directly to the Audit Committee, may be left in any one of two methods:

1. Secure Web Form

- [Click here](#) to access an Internet-based message interface that will deliver a message directly to the Audit Committee. Be advised that to use this system with complete anonymity, you should send this message from an unidentifiable location such as a public library terminal.

2. Voicemail

- Call 866-296-4215 to leave a message with the Audit Committee.