

SOUTHERN STATES BANCSHARES, INC.

INSIDER TRADING POLICY

March 17, 2021

I. Purpose

This Insider Trading Policy (“Policy”) of Southern States Bancshares, Inc. (together with its subsidiaries, the “Company”) sets forth the general standards for all employees, consultants, contractors, officers and directors with respect to engaging in transactions in Company securities and securities of other publicly traded companies. This Policy explains the prohibitions against “insider trading” based on federal securities laws and establishes Company policies and procedures to promote and monitor compliance with those laws.

Violations of insider trading laws can, and often do, result in federal and state criminal investigations, prosecutions, disgorgement of ill-gotten trading profits, fines and prison sentences. The Company and its officers and members of the Board could also face significant penalties for failing to take steps to prevent violations by Company personnel. Accordingly, your compliance with this Policy is of the utmost importance for both you and the Company.

This Policy describes the prohibition on insider trading applicable to all persons subject to the Policy, and also additional restrictions on individuals who have been informed in writing that they have been designated as “insiders” by the Chief Executive Officer. Insiders include members of the Company and Southern States Bank Boards of Directors, their officers, as well as certain of their employees, consultants and contractors who are likely to be in possession of material nonpublic information due to the nature of their work.

II. Scope of this Policy

A. Persons Covered. As an employee, consultant, contractor, officer or director of the Company and any investor with observation or information rights, this Policy applies to you. The same restrictions that apply to you also apply to members of your immediate family, members of your households, and any family members who do not live in your household, but whose transactions in Company securities are directed by you or are subject to your influence or control, such as parents or children who consult with you before they trade in Company securities (those persons are referred to as “related persons”). This Policy also applies to entities that you influence or control, including corporations, partnerships or trusts.

B. Individual Responsibility. Persons subject to this Policy have ethical and legal obligations to maintain the confidentiality of information about the Company and to not engage in transactions in Company securities while in possession of material nonpublic information (see Section IV “What is ‘Material Nonpublic’ Information?”). ***You are responsible for complying with this Policy and ensuring that any of your related persons or any entities you control also comply with this Policy.*** In all cases, the responsibility for determining whether you possess material nonpublic information rests with you. While the Company provides policies, procedures and training on insider trading, no action on the part of the Company, or any employee, consultant, contractor, officer or director pursuant to this Policy, constitutes legal advice or insulates you from

liability under applicable securities laws. You could be subject to severe legal penalties and disciplinary action by the Company for any conduct prohibited by this Policy or applicable securities laws (see Section IX “Consequences of Non-Compliance”).

C. Transactions Covered. Except as otherwise provided, this Policy applies to all transactions in Company securities, including common stock, restricted stock options for common stock and any other securities the Company may issue from time to time, including, but not limited to, preferred stock, warrants and convertible notes and debentures, as well as to derivative securities relating to Company stock, whether or not issued by the Company, such as exchange-traded options. This Policy also applies to transactions that occur after you cease to be an employee, consultant, contractor, officer or director of the Company for as long as you are in possession of material nonpublic information.

III. Statement of Policy

No person subject to this Policy who is aware of material nonpublic information may directly or indirectly:

A. engage in transactions in Company securities, except as otherwise specified in this Policy (see Section V “Transactions Excluded from this Policy”);

B. recommend the purchase or sale of any Company securities;

C. disclose material nonpublic information to persons (a) within the Company whose jobs do not require them to have that information, or (b) outside of the Company, including family, friends, business associates and investors, unless any such disclosure is made in accordance with the Company’s disclosure and external communications policies; or

D. assist anyone engaged in the above activities.

In addition, no person subject to this Policy who, in the course of working for the Company learns of material nonpublic information about a company with which the Company does business, may trade in that company’s securities until the information becomes public or is no longer material. Such companies include current or prospective customers or suppliers of the Company, companies with which we may be negotiating a major transaction and companies that may be a party to potential corporate transactions, such as an acquisition, investment or sale.

Stock sales or purchases that may seem necessary or justifiable to you for independent reasons (such as the need to raise money for an emergency expenditure), or stock sales or purchases for a small amount, are **NOT** exceptions to this Policy. The securities laws do not recognize any mitigating circumstances. Further, even the appearance of an improper transaction must be avoided to preserve the Company’s reputation for adhering to the highest standards of conduct.

IV. What is “Material Nonpublic” Information?

“Material” information is information that a reasonable investor would consider important in deciding whether to purchase, sell or hold a security, or information that is likely to significantly alter the total mix of publicly available information about the Company. Any information that

could reasonably be expected to affect the market price of a security is likely to be considered material. This determination is subjective and is made based on the facts and circumstances of each particular situation. Material information can be positive or negative and can relate to any aspect of the Company's business or to any type of Company securities, whether debt, equity or a hybrid. Information that could be considered material to the Company includes, but is not limited to, information regarding:

- A.** company revenues, expenses or earnings, including anticipated results or projections;
- B.** significant changes in financial performance or liquidity and expectations for future periods;
- C.** plans to merge, acquire a company, be acquired or sell a business unit or to sell significant Company assets or subsidiaries;
- D.** stock splits, public or private securities/debt offerings or repurchases, or changes in Company dividend policies or amounts;
- E.** significant changes in Company strategy or management;
- F.** plans with respect to future Company developments;
- G.** information pertaining to actual or threatened major legal proceedings, including the resolution of such legal proceedings;
- H.** changes in law and any analysis of the impact of such matters on the Company's business or business model;
- I.** significant accounting matters, including impairments or changes in asset values;
- J.** new finance sources, or the loss thereof, or extraordinary borrowings;
- K.** possible changes in the Company's credit rating by a rating agency;
- L.** award or loss of a significant Company contract;
- M.** possible proxy fights;
- N.** bankruptcy, corporate restructuring or receivership;
- O.** cybersecurity risks and incidents, including vulnerabilities and breaches; and
- P.** changes in auditors or auditor notification that the Company may no longer rely on an audit report.

The above list is not exclusive and many other types of information may be considered material, depending on the circumstances. The probability of whether an event will or will not occur affects the determination of whether it is material. The determination of whether information

was material will be viewed in hindsight, so any questions concerning the materiality of particular information should be resolved in favor of materiality and trading should be avoided.

“Nonpublic” information is information that is not available to the general public. In order for information to be considered public, it must be widely disseminated in a manner making it generally available to investors, including through the issuance of a press release, publication in a widely-available newspaper, magazine or news website, a webcast or a filing with the Securities and Exchange Commission (“SEC”). In addition, even after a public announcement of material information, a reasonable period of time must elapse in order for the market to react to the information. Generally, one full trading day after the public release of material information via the issuance of a press release, a webcast conference call or an SEC filing should elapse before trading.

V. **Transactions Excluded from this Policy**

This Policy does not apply to the following transactions, except as specifically noted:

A. 401(k) Plan. This Policy does not apply to purchases of securities in the Company’s 401(k) plan (assuming Company securities are available under the plan) resulting from periodic contributions of money to the plan pursuant to payroll deduction election. *However, this Policy does apply to changes to certain investment elections made under the 401(k) plan, including: (i) an election to increase or decrease the percentage of periodic contributions that will be allocated to the Company stock fund; (ii) an election to make an intra-plan transfer of an existing account balance into or out of the Company stock fund; (iii) an election to borrow money against a 401(k) plan account if the loan will result in a liquidation of some or all of the Company stock fund balance; and (iv) an election to pre-pay a plan loan if the pre-payment will result in allocation of loan proceeds to the Company stock fund.*

B. Restricted Stock Unit/Restricted Stock Awards. This Policy does not apply to the vesting of restricted stock units or restricted stock, or the exercise of a tax withholding right pursuant to which you elect to have the Company withhold shares of stock to satisfy tax withholding obligations upon the vesting of any such award. *However, this Policy does apply to any sale of common stock received by you as a result of the vesting.*

C. Stock Option Exercises. This Policy does not apply to the exercise of an employee or director stock option or to an award recipient’s use of shares delivered or withheld from the exercise to cover the cost of the option exercise or the satisfaction of tax withholding obligations. *However, this Policy does apply to any sale of the underlying stock or to a cashless option exercise through a broker, which entails the sale of a portion of the underlying stock on the market to cover the costs of exercise or the resulting taxes.*

D. Other Similar Company Plan Transactions. Any other purchase of Company securities from the Company or sale of Company securities to the Company are not subject to this Policy.

E. Bona Fide Gifts. Bona fide gifts of Company securities are not transactions subject to this Policy, unless the person making the gift has reason to believe that the recipient intends to sell the Company securities while the donor is aware of material nonpublic information.

F. Transactions Pursuant to Rule 10b5-1 Plans. Purchases and sales of Company securities pursuant to an effective Rule 10b5-1 Plan may be made notwithstanding this Policy. (See Section VII “Rule 10b5-1 Plans” for more information.)

VI. Prohibition of Short Sales

Short sales of Company securities (i.e., the sale of a security that the seller does not own) may evidence an expectation on the part of the seller that the securities will decline in value, and therefore have the potential to signal to the market that the seller lacks confidence in the Company’s prospects. In addition, short sales may reduce a seller’s incentive to seek to improve the Company’s performance. *For these reasons, short sales of Company securities are prohibited.*

VII. Rule 10b5-1 Plans

Rule 10b5-1 under the Securities Exchange Act of 1934, as amended, provides a defense from insider trading liability to a person who enters a trading plan for transactions in Company securities that meets the conditions specified in Rule 10b5-1. A Rule 10b5-1 plan must be entered into at a time when the person is not aware of material nonpublic information. Once the plan is adopted, the person must not exercise any influence over the amount of securities to be traded, the price at which they are to be traded or the date of the trade. The plan must either specify the amount, pricing and timing of transactions in advance or delegate discretion on these matters to an independent third party. *A standing or limit order does not, by itself, qualify as a Rule 10b5-1 plan.*

VIII. Additional Restrictions Applicable to Insiders

In addition to the prohibitions on insider trading described above that apply to all persons subject to this Policy, insiders and their related persons are subject to additional restrictions on trading. The provisions below will govern to the extent that any such requirement is more restrictive than the requirements set forth above.

A. Window Period Requirement. The Company requires that insiders trade in Company securities only during the period beginning on the second business day following the date of release of a quarterly or annual statement of earnings and ending on the 30th business day following such date (i.e., the 30-day “window period”). The Company will periodically issue detailed guidance and procedures to insiders subject to the window period for trading in Company securities. Trading during a window period minimizes the potential violation of insider trading laws because material financial information has just been released to the public. From time to time, insiders may also be advised that no trading will be permitted until further notice (generally known as a “black-out period”). *It should be noted that even during the window period, any person possessing material nonpublic information should not engage in any transactions in Company securities until the beginning of the second trading day following the date of public disclosure of such information, whether or not the Company has recommended a suspension of trading to that person.*

B. Hedging and Other Derivative Transactions. Transactions in publicly traded options are generally short-term in nature and may give the public the perception that insiders are

not focused on the long-term performance of the Company. Certain forms of hedging transactions are complex, may be perceived negatively by the public and can present unique insider trading risks. Accordingly, insiders are prohibited from engaging in such transactions.

C. Margin Accounts and Pledging. Insiders may not purchase Company securities on margin, borrow against any account in which Company securities are held, or enter into a pledge of Company securities as collateral for a loan without prior approval of the Company's compliance officer.

D. Standing and Limit Orders. Standing and limit orders, except under approved Rule 10b5-1 plans (see Section VII "Rule 10b5-1 Plans"), create heightened risks for insider trading violations similar to the use of margin accounts. There is no control over the timing of purchases or sales that result from standing instructions to a broker, and as a result the broker could execute a transaction when an insider is in possession of material nonpublic information. The Company therefore discourages insiders from placing standing or limit orders on Company securities other than for short durations within a window period.

E. Section 16 and Rule 144 Restrictions and Reporting. The federal securities laws, including Section 16 of the Securities Exchange Act of 1934, as amended, and Rule 144 under the Securities Act of 1933, as amended, impose additional trading restrictions and reporting obligations on executive officers, directors and holders of more than 10% of any class of equity security of the Company. *The Company will notify you if you are subject to these additional restrictions and reporting requirements.*

F. Rule 10b5-1 Plans. All Rule 10b5-1 plans must be adopted during a window period and pre-cleared in advance by the Chief Executive Officer. Trades executed pursuant to a pre-cleared Rule 10b5-1 plan do not require further approval and are not subject to the Company's window period, as Rule 10b5-1 provides an affirmative defense from insider trading liability under the federal securities laws for trading plans that meet certain requirements. *As noted above, a standing or limit order does not, by itself, qualify as a Rule 10b5-1 plan.*

IX. Consequences of Non-Compliance

Federal and state securities laws prohibit the purchase or sale of securities while aware of material nonpublic information as well as the disclosure of material nonpublic information to others who then trade in a company's securities (sometimes called "tipping"). Insider trading violations are pursued vigorously by the SEC, U.S. Attorneys and state enforcement authorities as well as the laws of foreign jurisdictions. Punishment for insider trading violations is severe, and may include significant fines and imprisonment.

Failure to comply with this Policy may also subject you to Company-imposed sanctions, including disciplinary action up to and including termination of employment, whether or not the failure to comply with this Policy results in a violation of law. A violation of law, or even questionable conduct leading to federal investigation that does not result in prosecution, can tarnish an individual's reputation and irreparably damage a career.

Violations of insider trading laws can, and often do, result in criminal investigations, prosecutions, disgorgement of ill-gotten trading profits, fines and prison sentences. Accordingly, your compliance with this Policy is of the utmost importance for both you and the Company.

X. Asking Questions and Reporting Concerns

It is your obligation to understand and comply with this Policy. If you are concerned that a policy has been violated, or have any questions about this Policy, you should discuss it with the Company's Chief Executive Officer, Stephen W. Whatley at (256) 241-1092 (email: swhatley@ssbank.bank.)

The Company will not tolerate retaliation against any employee who reasonably and in good faith raises a question or concern about the Company's business practices or compliance with applicable laws or regulations.

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SOUTHERN STATES BANCSHARES, INC.

FORM OF ACKNOWLEDGMENT

Please sign below acknowledging that you have read and agree to abide by the Company's Insider Trading Policy, and return this to the Corporate Secretary. You will be asked to verify your compliance with this Policy annually.

* * * * *

I have received, reviewed and agree to be bound by the Company's Insider Trading Policy.

Dated: _____

Signature: _____

Name: _____