

**WSFS FINANCIAL CORPORATION  
SUPPLEMENTAL ETHICS POLICY  
FOR EXECUTIVE OFFICERS**

WSFS Financial Corporation (“WSFS”) maintains an Ethics Policy (the “Ethics Policy”) applicable to all WSFS Associates. WSFS has enacted this Supplemental Ethics Policy for Executive Officers (the “Supplemental Ethics Policy”), which supplements the Ethics Policy (the Ethics Policy and the Supplemental Ethics Policy will be referenced collectively as the “Ethics Policies”). As used in the Supplemental Ethics Policy, the term “Executive Officers” means the Chief Executive Officer (“CEO”), the President, the Chief Financial Officer (“CFO”), the Controller, all other financial officers designated by the CEO or CFO from time to time, any vice president in charge of a principal business unit, division or function, and any other officer or other person who performs significant policy-making functions (collectively the “Executive Officers”)<sup>1</sup>. The Executive Officers are responsible for promoting and enforcing the highest standards of conduct and ethics in managing WSFS’ financial and other operations and assuring enforcement of this policy, which, as set forth below, includes compliance with all applicable laws and standards relating to ethical conduct, full and fair disclosure, compliance with law, prompt internal reporting of any violations of this Supplemental Ethics Policy and accountability for maintaining adherence to it. In the event of a conflict between the terms of this Supplemental Ethics Policy and the Ethics Policy, this Supplemental Ethics Policy shall control.

**Conflicts of Interest and Corporate Opportunities**

An Executive Officer is expected to avoid all situations that might lead to a real or apparent conflict between the Executive Officer’s self-interest and his or her duties to WSFS. WSFS recognizes that a "conflict of interest" occurs when a real or perceived private interest is in conflict with the interests of WSFS, as when an individual receives improper personal benefits as a result of his or her position with WSFS, or when an individual has other personal duties, responsibilities or obligations that run counter to his or her duties to WSFS. A conflict situation can arise when an Executive Officer takes actions or has interests that may make it difficult to perform his or her work for WSFS objectively and effectively. Conflicts of interest also arise when an Executive Officer, or a member of his or her family, receives improper personal benefits as a result of his or her position at WSFS. Loans to, or guarantees of obligations of, such persons are of special concern.

Similarly, Executive Officers, as well as all other Associates and Directors, are prohibited from (a) taking for themselves personally opportunities that are discovered through the use of corporate property, information or position; (b) using corporate property, information, or position for personal gain; and (c) competing with the company. Executive Officers owe a duty to WSFS to advance its legitimate interests when the opportunity to do so arises.

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<sup>1</sup> Securities Exchange Act Rules 16a-1(f) and 3b-7.

### **Waiver or Modification of the Supplemental Ethics Policy**

Any request for a waiver of or exception to the Supplemental Ethics Policy, or for any modification or amendment thereto, made by or on behalf of an Executive Officer, shall be submitted to, and shall only be approved by, the Board of Directors. No Executive Officer shall undertake any action involving a conflict of interest or a corporate opportunity, unless such action is approved by the Board of Directors after full and complete disclosure. Any such waiver, exception, modification or amendment will be promptly disclosed as required by applicable law, regulation, and/or the NASDAQ listing standards.

### **Confidentiality and Fair Dealing**

Executive Officers should maintain the confidentiality of information entrusted to them by WSFS or its customers, except when disclosure is authorized or legally mandated. Confidential information includes, without limitation, all non-public personal information of customers, and non-public information that might be of use to competitors, or harmful to WSFS or its customers, if disclosed. No Executive Officers may make use of confidential information for personal gain, including without limitation, use of such information in violation of the WSFS Policy and Procedures for Permissible Trading by Insiders.

Every Executive Officer should endeavor to deal fairly with WSFS' customers, suppliers, competitors and Associates. No Executive Officer should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts, or engage in any other unfair-dealing or practice.

### **Protection and Proper Use of WSFS Assets**

Executive Officers should protect WSFS' assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on WSFS' profitability. WSFS assets should only be used for legitimate business purposes.

### **Full, Fair and Accurate Regulatory and Public Disclosure**

Each Executive Officer has responsibility for the full, fair, accurate, timely and understandable disclosure in the periodic reports WSFS is required to file with the Securities Exchange Commission. Thus, each Executive Officer shall promptly advise the Audit Committee any material information of which he or she may become aware that affects or could affect the disclosures made or contemplated by WSFS in its public filings or in other public communications. In addition, each Executive Officer shall promptly report to the Audit Committee (i) any information he or she may have concerning significant deficiencies in the design or operation of internal controls which could adversely affect WSFS' ability to record, process, summarize and report financial data, or (ii) any suspected fraud, whether or not material, that involves management or other employees who have a significant role in financial reporting, disclosures or internal controls.

### **Compliance with Law**

Executive Officers shall proactively promote compliance with laws, rules and regulations, including insider trading laws. This includes encouraging Associates to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation.

An Executive Officer shall promptly disclose to the Audit Committee any information he or she may have concerning any violations of laws, rules or regulations or of the Ethics Policies.

### **Violations of Policy**

*The Board of Directors shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of the Ethics Policies. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Ethics Policies and shall include written notices to the individual involved. Such notice shall include any determination by the Board of Directors that one or more violations of the Ethics Policies has occurred and, specifying the substance of the violation(s). Consequences for violation(s) of the Ethics Policies may include, among other options, censure by the Board, demotion or re-assignment of the Executive Officer involved, suspension with or without pay or benefits (as determined by the Board) or termination of the Executive Officer's employment. In determining what action is appropriate in a particular case, the Board of Directors or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.*

### **Certification**

Each Executive Officer will annually certify to WSFS in writing that such Executive Officer has read and is in compliance with this Supplemental Ethics Policy, except as otherwise disclosed in the certification.