

Summary of Recent Amendments to Code of Business Conduct and Ethics

The Boards of Directors (the “Board”) of Bank of the Ozarks (the “Company”) approved and adopted amendments to the Company’s Code of Business Conduct and Ethics (the “Code”), effective as of August 15, 2017, to clarify the Company’s internal reporting procedures and the appropriate persons to whom potential violations of the Code should be reported internally.

The Board approved and adopted amendments to the Code, effective as of May 7, 2018, to expand the section of the Code dealing with the procedures, notices, and rules applicable to employees seeking or serving in elected or appointed political office, and to make other revisions intended to clarify the meaning of certain passages and update references describing where employees can locate various Company policies.