



# TOWNE BANK

## CODE OF CONDUCT





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## Our Core Values

TowneBank (“Towne”) was created to be a company built on a foundational culture of caring, centered on creating a warm sense of belonging among our shareholders, our members who would bless us with their business, the communities we would come to serve including those less fortunate, and each and every member of our Towne family. In essence, we would be a person-centered company where we would treat each person with dignity, compassion, and respect no matter their circumstances.

As a local bank, our family members are active in our local communities and focus on building strong relationships with our members. Over the years, we have expanded and grown the Towne Family of Companies to serve our communities through our Mortgage, Insurance, Wealth Management, and Trust divisions and our Real Estate Sales affiliate. Throughout our growth, we have never lost sight of our focus – to continue to be a community asset by serving others and enriching lives.

The honesty, integrity, and sound judgment of TowneBank and The Towne Family of Companies’ Executive Chairman, Chief Executive Officers (CEOs), executive officers, and employees are fundamental to our reputation and success. At Towne, our only indisputable rules for each Towne family member are:

1. Always do what is right.
2. Always use your very best personal judgment in all that you do.
3. Have fun.

## Statement from Executive Chairman

It is my pleasure to share the TowneBank Code of Conduct. One of our company’s pillars of success has been our ability to attract and retain exceptional people with extraordinary talent in financial services. Our family members are individuals who practice the code laid out on the following pages as an inherent part of their dispositions. We are a company of “Givers” who are internally gratified by serving and enriching the lives of others.

This document provides an important framework for the company we set out to create in 1999. Your leadership team wants all family members to follow the same principles for conducting business at our company. This code ensures we understand the legal and ethical implications of the decisions we make.

I encourage everyone to read this document to understand how the Code of Conduct applies to you personally. In order to best serve our local communities, all employees, management team members, and our board of directors will follow the Code of Conduct. If any part of our code is unclear, refer questions to your supervisor or contact a member of human resources.

Thank you for doing your part to ensure that Towne operates as an honest, open, and ethical financial institution.

G. Robert Aston Jr.  
Executive Chairman



## Who does the Code of Conduct Apply to?

Our Code of Conduct applies to all Towne Family Members, which refers to employees, directors, and executive officers of TowneBank and its affiliated companies (the “Towne Family of Companies”), including Towne Wealth Management, TowneBank Mortgage, Towne Insurance Agency, Towne Benefits, RW Towne Realty, and Towne Trust Company, N.A. We should engage with third parties that share our commitment to being a community asset that serves others and enriches lives. We expect everyone to act with the highest standard of personal and professional conduct in all aspects of their activities. Additionally, our Towne Family Members are expected to comply with all applicable laws, regulations, and TowneBank and Towne Family of Companies’ policies, including this Code of Conduct. Finally, we expect the TowneBank Board of Directors and Executive Officers to abide by this code and to lead by example by conducting themselves ethically, honestly, and with the highest level of integrity. While this Code of Conduct applies to all Towne Family Members, additional duties and responsibilities are included for our Executive Chairman, Board of Directors, and Executive Management team.

## Compliance with this Code

### All Employees

All employees will be notified of the Code of Conduct and required to acknowledge acceptance of the terms and conditions annually. (A record of each employee’s acknowledgment will be kept in Human Resources.) Each employee is charged with knowledge of the statutes, rules, and regulations governing the performance of their respective duties and shall abide by such provisions, including applicable controls of positions of public responsibility.

### Officers and Directors

Each officer and director will be required to complete and acknowledge an annual review statement attesting to his or her knowledge and compliance with the Code of Conduct and listing any material management and financial interest. Further, each director is charged with knowledge of those statutes, rules, and regulations which govern his or her service to Towne or in a position of public responsibility, whether elected or appointed, and shall abide by same.

### Violations

Violations of any portion of the Code of Conduct is grounds for disciplinary action ranging from reprimand to dismissal. Such action is in addition to any civil or criminal liability and penalties that may result.

Towne is committed to high standards of ethical, moral, and legal business practices. Consistent with this commitment, and Towne’s commitment to open communication, this policy provides a procedure for employees to raise concerns with the understanding that such employees will be protected from reprisals or retaliation on the basis of such concerns. Employees are encouraged to disclose wrongful conduct engaged in by others to the appropriate Towne authority so that prompt, corrective action may be taken.



For purposes of this policy:

- “Wrongful Conduct in the Workplace” includes any actions by employees, including management-level employees, customers, or other individuals in the workplace that are or may be contrary to Towne’s policies, the foregoing Code, or applicable law.
- A “Protected Disclosure” is a communication reporting actual or suspected Wrongful Conduct in the Workplace based on a good faith and reasonable belief on the part of the employee making such report that the conduct has both occurred and is wrongful under applicable law and/or TowneBank policy. Protected Disclosures do not include communications that are knowingly false or made with reckless disregard for the truth. Such communications are not protected pursuant to this policy, and employees making such communications will be subject to disciplinary action.

Employees who are aware of or have reason to suspect Wrongful Conduct in the Workplace should report the conduct (a “Protected Disclosure,” as defined above) to Towne’s management or to Human Resources. Employees are reminded that, pursuant to the TowneBank Non-Discrimination and Anti-Harassment Policy, employees have an obligation to report any concerns regarding discrimination and/or harassment.

Upon receipt of a Protected Disclosure, Towne will conduct a prompt and thorough investigation and will take any remedial action if needed. To the extent necessary and/or practicable, Towne will maintain confidentiality in connection with a Protected Disclosure. Towne, however, cannot guarantee confidentiality.

No employee making a Protected Disclosure will suffer harassment, retaliation, or adverse employment consequences on the basis of making a Protected Disclosure.

## **Ethics Quick Test**

When unsure of proper action in a given situation, ask yourself these questions:

1. Is it lawful?
2. Does it comply with Towne policy?
3. Does it reflect Towne values?
4. Does it protect Towne interests?
5. Would it meet with public approval?
6. Would management and our shareholders approve?
7. Would your friends and family approve?
8. Is it the right thing to do?

If you answered “NO” to any of these questions, do not do it.

## **Towne 101 – Professional Standards**

### **Ethics**

The relationship with our members must be one of absolute trust and confidence. At Towne, you are expected to conduct yourself beyond reproach and adhere to the strictest ethical standards and business practices. Our Code of Conduct is outlined in detail in the STANDARDS OF CONDUCT section of the TowneBank Employee Family Handbook and in this Code of Conduct. It is paramount that you read, understand and acknowledge receipt of this policy.



## **Confidentiality**

Financial Services is a confidential business. Our members count on us to safeguard and prevent any unauthorized access, disclosure or use of their financial and personal information. You are granted access only to member information you need to know to perform your job. All member information and Towne financial information you may have access to must be kept in strict confidence. So please consult your supervisor if you are ever uncertain about whether it is appropriate to reveal any information. A breach of confidentiality will result in disciplinary action and possible termination.

## **Member Relations**

Member relations are the very essence of our success. YOU represent Towne to the member, so your thoughtful, well-mannered approach, whether by telephone, letter or in person is vital. Courtesy should be extended to every member, regardless of the nature of the relationship.

Should you have an unhappy member, either on the telephone or in person, give the member an opportunity to “let off steam” before you respond. Even if the complaint is out of your realm of responsibilities, let the member state his or her case, then handle it as professionally and efficiently as possible. Do not transfer or send the member elsewhere unless absolutely necessary. If the problem cannot be resolved immediately, take the member’s name and telephone number, locate the right person to handle the problem and refer the problem to that person. Then, in a reasonable amount of time, check to make sure that the problem was addressed. If you received the complaint originally, then you are responsible for satisfying the member.

## **Business Conduct**

### **Compliance Ethics Laws**

Towne intends, in the conduct of its business, to obey all applicable laws and comply with all relevant regulations, including, not limited to, federal requirements under the Bank Secrecy Act. Where the requirements of such laws or regulations are unclear, the advice of Towne counsel should be sought by management, employees, or directors.

### **Non-Discrimination**

Towne is firmly committed to non-discrimination and equal-opportunity employment. All employees and applicants for employment, as well as existing and prospective members and suppliers, shall be treated without discrimination or harassment based on race (including hair texture and hairstyles), color, religion, national origin, age, sex, pregnancy, childbirth, lactation, conditions relating to pregnancy, childbirth, gender identity, genetics, sexual orientation, disability, veteran status, marital status, or any other characteristic protected by applicable law.

### **Money Laundering Laws**

Money laundering means converting illegal proceeds to make the funds appear legitimate. It is a global problem with far-reaching and serious consequences. As a financial services provider, it is our responsibility to help close the channels that money launderers use.



To prevent TowneBank from being used as a conduit for money laundering or for funding criminal activity, we comply with the Bank Secrecy Act (BSA) and related anti-money laundering laws and regulations. Failing to comply can result in severe penalties.

Each employee, director, and officer are responsible to be informed of BSA and anti-money laundering laws and to identify and report violations or suspicious activity, consistent with TowneBank policies and procedures for complying with BSA and anti-money laundering obligations. Employees must complete training as required. If questions or concerns about the legality of a transaction or series of transactions arise, advise your supervisor or management.

### **Improper Payments**

The use of Towne funds for any unlawful purpose or in violation of stated Towne policies is not permitted. No bribes, kickbacks, or similar remuneration or consideration of any kind are to be given or offered to any individual, organization, government, political party, or other entity or representative thereof, for any reason whatsoever. An employee, officer or director or representative of Towne possessing knowledge of such illegal payments, or of any unrecorded funds or false entries maintained for the purpose of facilitating such payments, must report immediately to the Executive Chairman or Internal Auditors.

### **Fair Competition**

In conducting its business, Towne engages in vigorous but fair and ethical competition. It is the strict policy of Towne that all officers, employees, and directors comply with the letter and spirit of the anti-trust laws and other statutes, rules and regulations in the conduct of their duties and business activities. Towne repudiates all illegal practices in conducting its business.

### **Fair Lending Laws**

We treat our credit applicants and members fairly and consistently in every phase of our lending activities, without regard to race, color, religion, national origin, ethnicity marital status, age, gender, disability, familial status, sexual orientation, receipt of public assistance income, or any other prohibited basis, as defined by federal, and state law and good banking practices. We expect the same from our corporate business partners and suppliers.

## **Conflicts of Interest**

### **Avoidance of Conflicts**

Private business, personal activities and duties of employment should be conducted in a manner that avoids conflicts with the interest of Towne, its members or the duties and responsibilities of any office held by an employee or director. A possible conflict of interest exists whenever a director and an employee have an interest in any entity, including TowneBank or a Towne Family Company, in a matter that may influence their judgment or whenever an impression of improper influence is created. Such conflicts are further defined by statute, rules and regulations, knowledge of which is imputed to all employees and directors and carry criminal or civil penalties.



## Receiving Gifts

To avoid possible conflicts of interest and violations of the Bank Bribery Act or other governing statutes or rules and regulations, officers, directors, and employees or members of their immediate families are not permitted to accept any gratuity, favor, service, discount or price concession, loan legacy (except from a relative), fee, compensation or anything of value in exchange for an official act or other conduct within their province, control, and responsibilities. Some exceptions may include:

- Business entertainment and other customary courtesies such as meals and sporting events, which involve no more than ordinary social activities that can be properly reciprocated by Towne as a business expense. (Lavish or extravagant entertainment should not be accepted unless reimbursed to the donor.)
- Gifts of nominal value received at holiday time or on special occasions.
- Gifts received because of kinship, marriage, or social relationships and not any business relationship.
- Unsolicited advertising or promotional materials that are generally otherwise available.
- Member or supplier paid travel or lodging where the trip has a predominant business purpose. Any such trips should be approved in advance in writing by management.
- Fees or other compensation received from an organization in which membership or official position is held, as approved by Towne.

Provided, however, that the forgoing exceptions shall not apply if in conflict with any statute, rule or regulation, which provisions shall always control and are presumed to be within the knowledge of the employee, director, or officer.

Employees, directors, and officers that suspect acceptance of a gift might give rise to an obligation or improperly influence the performance of duties, should not accept it. Employees, directors, and officers unsure if a gift violates the law or these Standards should seek guidance from management.

## Giving Gifts

Likewise, no employee, director or officer of TowneBank or member of his or her immediate family may extend a gift in violation of this Code of Conduct, statutes, or regulations.

## Material Management or Financial Interest

No employee, director or officer of Towne may represent it in any transaction with any person, partnership, corporation, or organization in which they or their blood, marital, or adopted relatives have a material management or financial interest. In all such situations, such person must, if possible, disqualify him or herself from any decision to be made or, in the alternative, relinquish such interest. Any material management interest means a position, such as director, trustee, officer, partner, proprietor, and any other management and ownership position in a profit-making or non-profit enterprise. Material financial interest means a 5% or greater ownership interest in a business or as defined by statute, rule or regulation. In order to avoid potential conflicts of interest, all directors, employees and officers must promptly notify Bank management upon subsequent acquisition of such material management or financial interest.



## **Non-Discrimination and Anti-Harassment Policy**

Towne firmly believes that discrimination and harassment seriously undermine the integrity of the employment relationship and respect for human dignity and is committed to a work environment in which all individuals are treated with dignity and respect. Each employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment, based on race (including hair texture and hairstyles), color, religion, national origin, age sex, pregnancy, childbirth, lactation, conditions relating to pregnancy, childbirth, or lactation, gender identity, genetics, sexual orientation, disability, veteran status, marital status, or any other characteristic protected by applicable laws.

In keeping with this commitment, Towne will not tolerate the unlawful harassment, including sexual harassment, of our employees by anyone, including supervisors, co-workers, or a third party. Behavior against any employee in violation of this policy, by any person – employee, guest, vendor, customer, or other person in the work environment – will not be tolerated.

### **Sexual Harassment**

Sexual harassment may consist of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature if: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such an individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

### **Other Forms of Harassment**

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written, or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race (including hair texture and hairstyles), color, religion, national origin, age, sex, pregnancy, childbirth, lactation, conditions relating to pregnancy, childbirth, or lactation, gender identity, genetics, sexual orientation, disability, veteran status, marital status, or any other characteristic protected by applicable laws that has the purpose or effect of creating an intimidating, hostile or offensive work environment; has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.

Conduct that violates this policy includes, but is not limited to, epithets, slurs, or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group. No such material may be placed on walls or elsewhere on Company premises, circulated or communicated to employees, or created and circulated using Company equipment and/or networks (e-mail, phone, text messages, tweets, blogs, social media, or other means).

### **Retaliation Prohibited**

Employees can raise concerns, make reports, or participate in investigations without fear of reprisal.

Towne strictly prohibits retaliation against any employee for making a complaint or for participation in the investigation of any such complaint.



## **Reporting Procedures**

Employees who believe they are being subjected to or who witness any form of harassment or intimidation, or who believe their employment is being adversely affected by any discriminatory or retaliatory treatment, must report such conduct immediately. If an employee feels uncomfortable or threatened, the problem should be brought to the attention of the Chief Human Resources Officer or the Chief Talent Officer. Your concerns will be investigated promptly, and appropriate action will be taken to remedy the situation. Although Towne cannot promise that all complaints will be kept confidential, we will preserve confidentiality on a need-to-know basis and consistent with our efforts to conduct an effective investigation of the situation.

Following an investigation, Towne will take prompt and appropriate remedial action in response to any complaints of discrimination, harassment, or retaliation, and anyone found to be engaging in unlawful discrimination, harassment, or retaliation will be subject to disciplinary action, up to and including termination of employment. If the alleged harassment, discrimination, or retaliation is from a vendor, contractor, customer, or other third party, Towne will take appropriate action to stop the conduct.

## **Outside Activities**

### **Community Involvement**

In order to discharge its civic and social responsibilities, Towne encourages its employees, officers, and directors to actively participate in community and professional activities and Towne grants leave for participation in certain such appropriate and credible activities. Any activities, including the above, which will significantly encroach or interfere with regular duties, adversely affect the quality of work performed or may subject Towne to criticism or adverse publicity, either must be avoided or approved by management or Human Resources.

### **Outside Employment and Business Activity**

Towne discourages outside employment and business activity of its employees. Those who believe an exception should be made in any situation shall obtain written approval from Human Resources. Employees and officers may not be employed by or advise any outside business that, in its principal activity, competes directly with Towne.

### **Director and Trusteeships**

As a corporate citizen, Towne believes in making its expertise available to the community by permitting employees and officers to hold director and trusteeships. Such director and trusteeships may also enhance the reputation of Towne. However, such relationships may have legal consequences or other ramifications for Towne that are unrecognized by the individual involved. Therefore, such outside director and trusteeships (as well as any resulting compensation) must have prior approval by the Executive Chairman (or his designee). The responsibility to be informed with respect to related statutes, rules, and regulations rest with the employee or officer and must be followed without exception.



## **Personal Conduct**

Towne employees, directors, and officers should be aware that personal conduct outside of work may reflect upon Towne. Accordingly, you are expected to be mindful and employ the “six o’clock news test” when considering such action or behavior.

## **Employee Conduct at Social Events**

Towne or its members may sponsor an occasional social event to which our employees may be invited. Employees attending such events should conduct themselves with the dignity and decorum expected of a Towne employee. If alcohol is served at any of these events, employees who are age 21 or older may choose to be served, but only in moderation, and they should always be mindful of their professional conduct and the limitations within the law.

## **Political Activity**

### **Corporate Activity**

Towne supports the American political system as essential to the communities in which it operates. This support does not include contributions or expenditures in connection with elections.

### **Individual Activity**

Employees, directors, and officers may participate in political activities as individuals and not as representatives of Towne. Care should be exercised in the use of an individual’s title or association with Towne to avoid the appearance of associating the credibility of Towne in support of a political position or candidate. Under no circumstances may Towne letterhead, logo(s) or like representation be used in connection with a political or similar campaign.

### **Public Office**

Members of the Executive Management Team, which includes all members of the Corporate Management Team, All Regional Presidents, and All Subsidiary Presidents, are prohibited from running for or occupying any elective public office.

Written approval must be obtained from the Executive Chairman (or his designee) before any employee not a member of the Executive Management Team accepts nomination or appointment to any public office. Because of statutory requirements, such service might be improper, unless assurances exist that relations between Towne and the government agency in which the individual would serve are not prohibited. The responsibility to be informed and knowledgeable and to abide by such statutory requirements rests solely upon the employee.

### **Lobbying**

Because of the complexity of the laws governing lobbying, all contacts by employees with members of local, state and federal legislative bodies on matters relating to Towne or banking generally must have prior approval of the Executive Chairman (or his designee).



## **Personal Finance**

Just as the Towne reputation rests in part on the intelligent management of its members' funds, so its employees, directors, and officers are expected to manage their personal finances in an intelligent and prudent manner. Financial activities should be avoided that pose excessive monetary or credit risk or that might otherwise reflect adversely on Towne.

### **Investments**

Like other individuals, employees, directors, and officers may make personal investments in corporate stocks, bonds, real estate, money market instruments, or other securities, including those issued by TowneBank. In making such investments, however, one should be guided by an awareness that investments should not influence judgment or action in the conduct of TowneBank's business. Investments by an employee that qualify as "material financial interests" should be reported promptly to the immediate supervisor. Officers and directors must disclose such interest in an annual statement.

### **Securities of Members and Suppliers**

Employees should not invest in securities, enterprises, or other activities of members and suppliers that are not available to the public unless prior written approval is obtained from the Executive Chairman (or his designee). Directors, officers, as well as other individuals privy to corporate merger and acquisition or unreleased earnings information, should exercise extreme caution in their actions regarding any purchases and sales of TowneBank stock. In all situations, individuals should scrupulously avoid taking advantage of nonpublic corporate information that they may know or learn. Employees, officers, and directors are charged with knowledge of any statutes or regulations that govern such situations and comply with same.

### **Borrowing**

Employees may not borrow from or lend personal funds to employees, members or suppliers without prior approval of the Executive Chairman (or his designee). Employees may, of course, borrow from banks or other entities normally engaged in the business of lending on terms offered to others under similar circumstances and without special concessions. Certain officers and directors who borrow are subject to the limitations and reporting obligations of the Federal Reserve Board and related statutes, rules, and regulations and are charged with such knowledge.

### **Abuse of Bank Account**

Abuses of an account, such as intentional, repeated or excessive overdrafts, should be avoided. Directors and officers should be particularly careful to avoid even inadvertent overdrafts.



# Executive Chairman, Chief Executive Officer, Executive Officers and Senior Financial Officers Code Of Ethical Conduct

## Preface

The honesty, integrity, and sound judgment of the Executive Chairman, Chief Executive Officer (“CEO”), executive officers and senior financial officers are fundamental to the reputation and success of Towne. While all employees, officers, and directors are required to adhere to the TowneBank *Standards of Conduct*, the professional and ethical conduct of the Executive Chairman, CEO, executive officers, and senior financial officers are essential to the proper function and success of TowneBank as a leading financial services provider.

The Executive Chairman, CEO, executive officers and senior financial officers hold an important and elevated role in corporate governance. These individuals are key members of the management team, who are uniquely capable and empowered to ensure that the interests of stakeholders (including shareholders, clients, employees, suppliers, and citizens of the communities in which TowneBank operates) are appropriately balanced, protected, and preserved. The Executive Chairman, CEO, executive officers and senior financial officers fulfill this responsibility by prescribing and enforcing the policies and procedures employed in TowneBank's financial operations.

## General standards of ethical behavior

The Executive Chairman, CEOs, executive officers and senior financial officers of Towne performing accounting, audit, financial management, or similar functions must:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- Provide colleagues with information that is accurate, complete, objective, relevant, timely, and understandable.
- Comply with applicable laws, rules, and regulations of federal, state, and local governments (both United States and foreign) and other appropriate private and public regulatory agencies.
- Act in good faith, with due care, competence, and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.
- Respect the confidentiality of information acquired in the course of employment.
- Share knowledge and maintain skills necessary and relevant to TowneBank's needs.
- Proactively promote ethical and honest behavior within the workplace.
- Assure responsible use of and control of all assets, resources, and information in possession of TowneBank.
- Keep management informed of financial information of importance, including departures from sound policy, practice, and accounting norms.

## Standards regarding financial records and reporting

The Executive Chairman, CEOs, executive officers and senior financial officers of Towne performing accounting, audit, financial management, or similar functions must:

- Establish systems and procedures to ensure business transactions are recorded in accordance with Generally Accepted Accounting Principles, company policy, and appropriate regulatory



- pronouncements and guidelines.
- Protect and maintain accounting records and information as required by applicable law, regulation, or regulatory guidelines.
  - Inform the Board of Directors and the Audit Committee of any material information that affects the disclosures made by Towne in its public filings.
  - Report to the Board of Directors and the Audit Committee concerning (a) significant deficiencies in the design and operation of internal controls or (b) any fraud involving management or other employees with a significant role in the Towne's financial reporting, disclosures, or internal controls.
  - In addition, the Executive Chairman, CEO, CFO, Executive officers and other Senior Financial officers are expected to provide the Board of Directors and Audit Committee, on a timely basis, with such information relating to the financial status of the Company, relevant business environment and other pertinent matters which are considered essential for the Board of Directors to fulfill its obligations.

The Executive Chairman, CEO, executive and senior financial officers are expected to adhere to both the *TowneBank Standards of Conduct* and the *TowneBank Chief Executive Officer and Senior Financial Officers Code of Ethical Conduct* at all times. The board of directors shall have the sole and absolute discretionary authority to approve any deviation or waiver from the *Code of Ethical Conduct*. Any waiver and the grounds for such waiver for the Executive Chairman, CEO, executive or senior financial officers shall be promptly disclosed through a filing with the Federal Deposit Insurance Corporation on Form 8-K. Additionally, any change of this *Code of Ethical Conduct* shall be promptly disclosed to stockholders.

The policy is applicable to executive officers for purposes of Regulation O, any person Executive Vice President and above in Corporate Accounting, and the Chief Audit Executive.

This policy is reviewed on an annual basis and is re-approved as changes are required.

Member FDIC | Equal Housing Lender | Insurance and wealth management products are Not bank deposits or obligations, Not FDIC-insured, Not guaranteed by TowneBank, Not insured by any state or federal government agency, and May go down in value.