

As part of its effort to fight predatory lending and to promote honest and ethical conduct, FLCBank has established a Code of Ethics and Conflict of Interest and Conduct Policy as applicable to the company's officers, employees, and customers to:

- Engage in and promote ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, and to disclose to FLCBank any material transaction or relationship that reasonably could be expected to give rise to such a conflict.

Note: FLCBank does not allow a loan originator to take a family member's loan application; it is permissible however for another loan originator in the same office to take the loan application on his/her behalf. FLCBank defines a family member as one's spouse, child, spouse's child, daughter-in-law, son-in-law, brother, sister, mother, father, grandparents, grandchild, step-brother, step-sister, step-parents, parents-in-law, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, guardian, and ward.

- Carry out your responsibilities honestly, in good faith and with integrity, due care and diligence, exercising at all times the best independent judgment.
- Comply with applicable government laws, rules and regulations of federal, state and local governments and other appropriate regulatory agencies.
- Never to take, directly or indirectly, any action to coerce, manipulate, mislead, or fraudulently influence company officers, employees and borrowers.
- Provide written disclosure of all financial terms of the transaction.
- Never condone, engage in or be a party to questionable appraisal values, falsified selling prices, concealment of pertinent information and/or misrepresentation of facts, including the cash equity of the mortgagor in the subject property.
- Not knowingly put Borrowers in jeopardy of losing their property through fraudulent, unsafe or unsound lending practices.
- Affirm commitment to the Fair Housing Act and the Equal Credit Opportunity Act, and always treating customers consistently and equitably.
- Avoid providing legal advice.