



Standards of

Business Conduct and Ethics

An illustration of three hands holding up speech bubbles. The top-left hand is dark-skinned and wearing a dark suit sleeve. The top-right hand is light-skinned and wearing a light blue shirt sleeve. The bottom hand is light-skinned and wearing a light blue shirt sleeve. The speech bubbles are white with black outlines and contain the text "Raise", "Your", and "Hand!" respectively.

Raise

Your

Hand!



Fueled by an independent spirit, inspired by the ingenuity of customers like you and grounded by the values of our community, LegacyTexas is one of the oldest and largest banks based here in North Texas. For over 60 years, individuals, families and businesses have chosen LegacyTexas because of our comprehensive products, exceptional customer service and commitment to our community.



Tony LeVecchio
Chairman



Kevin Hanigan
President & CEO

A Message from our Chairman and our CEO

Banking is a highly competitive industry, and nowhere is that more evident than right here in North Texas. So, what is it that differentiates LegacyTexas from other banks? What is the secret to our success?

Our people.

At LegacyTexas, we are family like no other. We understand the importance of building relationships, and we strive to live our values each and every day while consistently seeking opportunities to help our customers build and grow their legacies.

Our reputation.

Since 1952, LegacyTexas has been a well-respected community partner, and we recognize that maintaining our good reputation requires each of us to take personal ownership of our conduct. We must remain mindful of our commitments to one another, our customers, our business partners and to the communities where we work and live. Our Standards of Business Conduct and Ethics expands on our personal responsibilities and emphasizes the importance of complying with the law and using good judgment in everything we do.

Our integrity.

We are each responsible for the safety and soundness of our company, and we protect its interests at all times by adhering to regulations, standing by our policies and approaching every task with the highest standard of ethics. Most importantly, we hold one another accountable by “raising our hand” and speaking up when we see something that doesn’t seem ethical or right.

Through our strong commitment to living our values and following our Standards of Business Conduct and Ethics, we will achieve even greater success.

We are LegacyTexas!

Tony LeVecchio
Chairman

Kevin Hanigan
President & CEO

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I. Our Commitment to Legal and Ethical Behavior

A fundamental Company value is that we conduct all of our business in a lawful and ethically responsible manner. We believe this commitment benefits every one of our employees,

our customers, and our shareholders. Our common set of values and our collective dedication to conducting business with integrity allows us to be a proud part of the LegacyTexas family.



II. Our Company's Standards of Business Conduct and Ethics

A. What They Are

While these Standards of Business Conduct and Ethics ("Standards") are not expected to describe every law or internal policy that could apply in every situation, they do provide guidance to help us understand, recognize and deal with common ethical issues.

These Standards also foster a culture of integrity and ethical conduct, and ultimately they provide mechanisms to report conduct that may not comply with these Standards. These Standards, taken together with all of our policies and procedures and the LegacyTexas Employee Handbook ("Employee Handbook") collectively sets out the Company's expectations.

B. Why They Are Important

These Standards are critical because failing to operate ethically and with integrity, we could lose shareholder value, customer or employee trust, and in some cases, these failures pose the risk that civil or criminal penalties may be levied against the Company, the individuals involved, or both.

C. To Whom They Apply

These Standards apply to everyone (directors, officers, and employees) and to all Company activities (deposit gathering, loans, back office, etc.) in every market in which we operate. Please ensure that you understand these Standards, as well as applicable laws, rules and regulations, the Employee Handbook and all policies and procedures of the Company, and always abide by them. **Nothing contained in these Standards, or elsewhere, though, creates a contract of employment with any employee.**

D. Your Role

You have a personal obligation to conduct your work in observance with the letter and the spirit of these Standards and to report any actual or even suspected violation of these Standards. If you have any questions about what that means, a good starting point is often your direct supervisor but you may also contact Human Resources, the Chief Risk Officer, the Chief Compliance and Operational Risk Officer, Fraud & Ethics Manager, or if you prefer you may make a report directly to the Compliance and Ethics Hotline.

Remember, if there is a problem at the Company, real or perceived, including any potential violations of these Standards, and you tell us about it, the problem becomes OUR problem to work through. If you do not, then the problem remains yours and we cannot help you solve it.

Ethical Conduct and Legal Compliance is Everyone's Responsibility!

E. Additional Responsibilities of Supervisors

Supervisors have additional responsibilities. Supervisors must reinforce the Company's culture of integrity and ethical conduct by developing a thorough understanding of these Standards, setting a proper example for their staff, answering questions from their team and, as with any member of their team, ensuring that even potential violations are reported to their supervisor, Human Resources, the Chief Risk Officer, the Chief Compliance and Operational Risk Officer, Fraud & Ethics Manager or by using the Compliance and Ethics Hotline. To be clear, if a supervisor becomes aware or is notified of even a potential violation and fails to report it, the Company generally will consider that a serious violation of the supervisor's duties which, depending on the circumstances, indicates a high likelihood of the

Company's lack of confidence in that person's ability to continue to function in a supervisory role.

Directors, Executives and other senior leaders are expected to set the proper "tone at the top" by proactively communicating their commitment to legal compliance and ethical conduct, serving as role models in their words and actions, and ensuring that everyone understands the value that our Company places on ethical conduct and integrity. They must also communicate and demonstrate that these Standards apply to all employees equally, without regard to who may be involved, the level of that person within the Company, or the potential impact that may result from the fair, consistent and equal application of these Standards.



QUESTION I'm a manager and I'm not clear

what my obligations are if someone comes to me with an issue – and what if it involves a senior leader?

No matter who is involved, you must report the issue—without exception. Our Company provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in these Standards or report the concern anonymously to the Compliance and Ethics Hotline.

F. Guidance

If you have questions or need guidance regarding these Standards, please contact your supervisor, a Human Resources representative, the Chief Risk Officer, the Chief Compliance and Operational Risk Officer, Fraud & Ethics Manager or the Compliance and Ethics Hotline.

Under the direction of the Chief Risk Officer, our Company's Chief Compliance and Operational Risk Officer maintains operational responsibility for these Standards. While the Chief Compliance and Operational Risk Officer administratively reports to a member of the Company's executive team, the Chief Compliance and Operational Risk Officer ultimately reports directly to the Audit Committee of Company's Board of Directors.

The Company, in its discretion, may interpret and, if necessary, amend these Standards to ensure a uniform and acceptable culture of legal compliance and ethical conduct.

G. The Compliance and Ethics Hotline

The Compliance and Ethics Hotline is a tool administered by an independent third-party and is staffed by specially trained call representatives 24 hours a day, 7 days a week. Anyone may use the Compliance and Ethics Hotline to ask questions, seek guidance on specific situations, or report suspected violations of these Standards, the Employee Handbook, Company policies or procedures, or any law or regulation.

The independent, third-party administrator will never tell the Company who uses the Compliance and Ethics Hotline unless you chose to identify yourself. And while it is generally easier to investigate a situation if we can ask questions to better understand your concerns, you may also remain anonymous if you prefer. But whether you identify yourself or not, all reports of suspected violations will be thoroughly assessed and, if warranted, investigated and held in strict confidence to the fullest extent possible.

The Toll-free Telephone Hotline
Number is **855-241-1901**

The Internet address is
www.ltxb.ethicspoint.com

H. Retaliation is Strictly Prohibited

No employee shall be retaliated against because that person invoked their rights under these Standards or any law, for raising a concern about potential wrongdoing, or for participating in an investigation. Simply stated, retaliation is prohibited and will not be tolerated. Anyone who is found to have engaged in retaliatory conduct will be subject to discipline, up to and including termination.

I. Framework for Making Ethical Decisions

Situations involving ethics and values can be complex. Sometimes, the applicable law or Company policy clearly indicates the best course of action. Many times, however, the best option is not as obvious.

- **Is it legal?** The Company does not condone or tolerate violations of the law. If you are unsure, raise your hand and ask.
- **Does it comply with Company policy and these Standards?** If you are unsure, raise your hand and ask.
- **How does it affect others?** Will it adversely impact customers, shareholders, suppliers, business partners, competitors, the community, other employees or you? If you are unsure, raise your hand and ask.
- **How might it look to others?** While a given action may appear to be in a “grey area,” taking that action could still be harmful. Remember, the appearance of impropriety or wrongdoing is sometimes just as damaging as a clear violation. Avoid even the appearance of wrongdoing. If you are unsure, raise your hand and ask.
- **How would you feel if your decision were made public?** Would your decision be difficult to defend? Would it embarrass you? Those answers could be indicators that you should escalate your concern. And again, if you are unsure it’s always safer to simply raise your hand and ask.



QUESTION My supervisor may be submitting excessive mileage for expense reimbursement. What should I do?

Expense reimbursement fraud is a big problem for many companies and is potentially a criminal offense. If you are uncomfortable reporting your concerns to anyone directly, you can report it anonymously using the Compliance and Ethics Hotline.

Don’t attempt to handle difficult ethical or compliance decisions on your own. Remember, if you raise your hand, your problem then becomes OUR problem to deal with. So please, elevate your concerns. If you are struggling with an issue, someone else has likely already dealt with the same issue, and if not, then we can all benefit from the knowledge gained from addressing it for the first time. Together we can all ensure the Company’s values are strictly followed, while maximizing whatever business opportunity is under consideration.

III. Equal Opportunity, Diversity and Workplace Safety

A. Equal Opportunity and Diversity

Our Company is committed to equal employment opportunity and compliance with all laws prohibiting employment discrimination or harassment on the basis of race, color, sex, national origin, age, religion, disability, and all other legally protected classifications. If you feel that you have been a victim of discrimination or harassment, you should immediately report it to your supervisor, Human Resources, the Chief Risk Officer, the Chief Compliance and Operational Risk Officer, Fraud & Ethics Manager or by using the Compliance and Ethics Hotline.

Our Company also values diversity in the workforce and strives to foster an inclusive work environment in which all individuals are treated with respect and dignity. Everyone should expect and be permitted to work in a business-like atmosphere that respects the input and inherent value of every person, whether an employee, customer, vendor, or competitor.



QUESTION While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. It was "after hours" so I wasn't sure what I should do. Was his behavior appropriate?

No it wasn't. This type of conduct will not be tolerated during working hours or after, including business trips. Tell your colleague such

actions are inappropriate and must be stopped, and that, if they continue, you will report the problem.

B. Safe and Healthy Work Environment

Our Company is committed to providing a safe and healthy work environment for colleagues and customers alike, and each of us is responsible for acting in a way that protects ourselves and others. Situations that may pose a health, safety or environmental hazard must be reported immediately. We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. Be proactive and speak up. The more we communicate, the better we can respond to any unsafe or unhealthy

working conditions.

C. Alcohol and Drug-use

You should never be impaired while at work or while engaged in Company business. While conducting Company business, do not use or be under the influence of legal or illegal drugs or any other substance that could impair your ability to think clearly, interfere with a safe and effective work environment or harm the Company's reputation.

D. Preventing Workplace Violence

Violence of any kind, or even the threat of violence, has no place in our Company. We will not tolerate intimidating, threatening or hostile behavior, even when it's simply considered a person's "management style." We will not tolerate any intentional touching of another with the intent to intimidate or cause physical or mental injury to that person or anyone else. Carrying weapons, including legal firearms, onto Company property is strictly forbidden.



IV. We Will Obey Applicable Laws and Regulations

Our Company requires that every director, officer and employee comply with all applicable laws, rules and regulations, and some of the specific areas of concern particular to our industry are covered below. This list is not exhaustive, but it does touch briefly on a few areas that come up most often in the financial services industry.

A. Insider Trading

You may become aware of inside information about our Company or other companies which, if disclosed, could impact the value of publicly traded securities. Inside information is generally defined as material information that is not available to the general public and could influence a reasonable investor to buy, sell or hold stock or securities. Some examples might include nonpublic information about our Company's financial performance, like earnings and dividend actions, acquisitions or other business combinations, divestitures, major new product announcements, and other significant activities.

You may not disclose any inside information. You cannot share it with the media, financial analysts, competitors,

or other third parties, including friends and family.

You also may not trade any securities on the basis of inside information, whether the security is that of LegacyTexas Financial Group, Inc., a customer or vendor of LegacyTexas Bank, or any other individual or entity.

You cannot evade these restrictions by acting through anyone else or by giving inside information to others for their use even if you will not financially benefit from it. Any violation of these laws could result in civil and criminal penalties, including fines and jail sentences not just for our Company, but for you individually.

B. Financial Disclosures

As a public company, it is critically important that we comply with all securities laws and regulations and communicate with our investors through full, accurate, and understandable disclosure in our reports and public filings. Depending on your position, you may be asked by the Company's internal auditors, its external auditors, executive management or the Company's disclosure committee to provide information to ensure that our Company's financial reports are accurate and meet all legal and accounting

requirements. We expect everyone to take these responsibilities very seriously, so when you are responding to such a request, you must provide complete and accurate information, and not say or do anything that even gives the appearance of an attempt to fraudulently influence, coerce, manipulate or mislead anyone.

All employees with supervisory duties must also maintain appropriate internal controls over all areas of their responsibility to safeguard the accuracy of our financial records and reports. Our Company expects all employees to adhere to these controls including any enhanced requirements that may be imposed on you because of the position you hold in the Company.

C. Anti-Bribery and Kickbacks

Our Company expects its employees and all third-party relationships to comply with all anti-bribery laws. You may not pay, loan or provide anything of value to anyone as a bribe, “kickback” or payment designed to influence the conduct of the recipient; you may not accept any services, funds, or anything of value, including any preferential treatment for fulfilling your responsibilities at the Company. Something you consider a simple “favor” could be a violation of these laws. Under the Foreign Corrupt Practices Act, which applies to all U.S. citizens and non-citizens who reside in the United States, the prohibitions above even apply to foreign officials.

Conduct your business affairs so that the Company’s reputation will not be tarnished if the details become public.

D. Fair Competition and Antitrust Concerns

Our Company acts independently and sells its products and services fairly and honestly on the basis of price, value and quality. All employees are prohibited from entering into any discussions, or agreements with competitors regarding any aspect of the Company’s business, including price, costs, salaries, products or market share. Where contact is unavoidable and serves a legitimate, business purpose, such as in connection with trade association meetings or discussions of joint business or ventures, consult with your supervisor, Human Resources, the Chief Risk Officer, the Chief Compliance and Operational Risk Officer, Fraud & Ethics Manager or use the Compliance and Ethics Hotline.



QUESTION
I received sensitive pricing information from one of our competitors. What should I do?

You should disclose this immediately in accordance with these Standards. It is important that from the moment we receive such information we demonstrate respect for antitrust laws and we make clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.

E. Compliance with Financial Services Laws and Regulations

The financial services industry is one of the most highly regulated industries in the country and so it is impractical to list every law with which we expect strict compliance. That said, we do expect strict compliance with every law and regulation applicable to us. By way of example, some of these laws include the Bank Secrecy Act, Office of Foreign Asset Control regulations, fair lending laws and regulations, the Community Reinvestment Act, and anti-money laundering laws, but there are many more that impact deposit gathering and lending. Any questions in this area should be directed to your supervisor or the Compliance Department.

F. Political Contributions

Political contributions are subject to complex rules and in some cases it is a crime to use corporate funds for such

purposes. Therefore, our Company prohibits the use of corporate facilities, resources or funds that benefit any political candidate for, or the current holder of, a political office, whether local, state or federal. You are free to exercise your right to make personal political contributions within legal limits, but reimbursement of your personal political contributions is prohibited.



QUESTION I will be attending a fund raiser for a candidate for local office. Is it OK to list my position at LegacyTexas as long as I don't use any Company funds or resources?

No. You may not associate the Company in any way with your personal political activities.



V. Conflicts of Interest

We must always remember that we are working for the best interests of our Company and its shareholders. For this reason, we must avoid situations where our personal interests may conflict, or even appear to conflict, with that goal. The rules against conflicts of interest apply not only to Company directors, officers and employees, but also to their families and friends. For instance, a gift from a supplier to your family member can create the same conflict of interest as if you personally received the gift.

You must conduct yourself so that conflicts do not arise but, if they do, you must immediately report it to your supervisor, Human Resources representative, the Chief Risk Officer, or the Chief Compliance and Operational Risk Officer. We must determine whether a conflict actually exists, and if so whether it can be eliminated. If you are a director or executive officer, you must report any potential conflict directly to the Board of Directors.

Here are some examples of potential conflicts and our related guidelines:

A. Accepting Gifts and Entertainment

Our shareholders expect us to make business decisions in the best interests of our Company and not for our own personal benefit. With the exception of a gift of “nominal value”, you must not accept an unsolicited gift, personal service, or favor from any person or company doing or attempting to do business with the Company. Accepting such a gift can appear as an attempt to improperly influence you into favoring a particular person, entity or business relationship. Gifts of cash or cash equivalents such as gift cards, or securities may never be accepted, regardless of the amount.

You must never, directly or indirectly, solicit any gift or favor from anyone regardless of your position at the Company.

Generally, “nominal value” is any gift, merchandise, product, personal service or favor having a retail value of less than \$250. This dollar limit is intended to serve as a guideline, and you should consult with your supervisor before accepting any gifts to ensure that the gift otherwise is permissible.

Normal business entertainment, such as meals, sporting or media events, may be appropriate if it is reasonable in nature and value, and the purpose is to hold bona fide business discussions or, if intended as a simple business courtesy, and is otherwise consistent with customary business practice.

If the gift is otherwise permitted by these Standards, you must still report the gift by completing the Gifts & Entertainment Questionnaire on LegacyNet and sending it to your supervisor and the Chief Compliance and Operational Risk Officer because the Company has obligations to track and report on these gifts in accordance with applicable law.

If you are given a gift worth more than nominal value or is not permitted under these Standards, you must immediately report this to your supervisor and to the Chief Compliance and Operational Risk Officer as well. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

B. Outside Financial Interests and Investments

Unless approved in advance, you may not have a direct or indirect financial interest (excluding modest investments of less than 5% in nationally-traded stocks) in a competitor, customer or supplier, if you or your subordinates deal directly or indirectly with that competitor, customer or supplier in the course of your job. Prohibited financial interests may include a simple loan, unless the loan is a third-party, arm's length transaction in the ordinary course of business.

C. Corporate Opportunities

You may not take opportunities for yourself that are discovered through the use of, or access to, Company property, information or your position with the Company. You also may not use Company property, information or your position with the Company for personal gain or private business activities or to compete with the Company. Remember, you have a duty always to advance the interests of the Company first, and to act in its best interests. An example of this concept is bidding against the Company at a real-estate foreclosure sale.



QUESTION

During contract negotiations with a potential new supplier, the new supplier mentioned that they had a complimentary registration to a local business seminar. They are unable to attend and asked if I would like to go in their place. I had been thinking of attending the seminar anyhow, since the subject of the seminar applies to my work. There's no personal gain to me, it would be good for LegacyTexas, and it would be a shame to waste the registration so I planned on saying 'yes.' Now I wonder if that would be the right decision

You should decline the offer. If you are involved in contract negotiations, you must never accept any gifts while the negotiation process is on-going, even if it is of nominal value. Accepting gifts during negotiations can give the appearance of a 'quid pro quo' and is always inappropriate.

D. Conflicts of Interest in the Context of Loan Services

Conflicts of interest can also potentially exist in the context of the Company's loan products and services. Examples of such potential conflicts of interest might include:

- Approving a loan with an implicit requirement that the borrower also contract for specific additional services from a person or company to be determined by the loan underwriter;
- Granting exceptions to Company loan underwriting policies and procedures that are not borrower-initiated, that are unwarranted under the circumstances, or that are not in strict compliance with Company policies;
- Approving a loan to an employee of the Company or a banking regulator (e.g., employee of the Federal Reserve or Texas Department of Banking) without first obtaining proper Company-level approvals; or
- Receiving or offering, directly or indirectly, any fee, commission or other compensation or benefit of any kind in connection with a Company loan except as expressly provided by the Company.

E. Disclosure of Fiduciary Relationships with Customers

You may not serve as authorized signer, agent, or attorney-in-fact of a customer of the Company or as an executor, beneficiary, trustee or guardian of a will, estate, trust or guardianship, established by an individual customer of the Company, except when the individual customer is your relative.

If you know or suspect that you or an immediate family member has been named as a person to serve in such a capacity, you must report this information to the Chief Compliance and Operational Risk Officer. If an exception is granted, you must conduct your duties in a manner demonstrably separate and apart from your duties at the Company and expressly disclose to third parties that your activities are not those of the Company.

VI. We Will Protect Our Company and Customer Information

You may have access to trade secrets and other confidential and sensitive information about our Company, employees, operations, or customers. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company and/or our customers if disclosed, including information concerning pricing, current products and products under development. You must not use or disclose this information, except to persons or entities who have a valid business reason to have access to it, and only as required in performing your duties. You must ensure that methods of access to such information are maintained in a secure fashion.

There are a variety of laws protecting confidential information and how it may be collected, shared, and used. Many of us have access to this information related to our colleagues, customers or others. While protecting this information is a legal requirement, it also is a matter of trust. Consequently, be sure you:

- Learn about the types of information that receive heightened protection by the law and Company

policy (such as personally identifiable information, social security numbers and bank account numbers) and protect that information as required by Company policy.

- Don't access, discuss or share confidential information unless there is a legitimate business reason to do so.
- Destroy any confidential information that is no longer required for business reasons in accordance with our records retention policies.
- Report any loss or inadvertent disclosure of confidential information.
- Consult the Chief Compliance and Operational Risk Officer or the Fraud & Ethics Manager if anyone outside the Company requests any confidential information.

This confidentiality obligation does not prohibit or restrict you from initiating communications with, or responding to any inquiry from, or providing testimony before any federal, state or local regulatory authority, including but not limited to the Securities and Exchange Commission. You do not need the prior authorization to make any such reports or disclosures, and you are not required to notify the Company that you have made such reports or disclosures.

VII. We Deal Fairly and Honestly with Business Partners and Governmental Agencies

A. Business Partners

We must deal fairly with our customers, competitors and business partners. Dealing fairly means not taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice. Our Company strongly encourages dialogue with outside parties to uncover situations that give rise to ethical questions and to articulate acceptable ways of handling those situations.

B. Governmental Agencies

Some employees may represent our Company in business with federal, state or local government agencies, including the Company's primary banking regulators. All employees engaged in business with a governmental body or agency must know and abide by the specific rules and regulations covering relations with public agencies and conduct themselves in a manner that avoids even the appearance of an improper attempt to influence a public official in the performance of their official duties.



VIII. Investigation of Potential Violations

A. Duty to Cooperate and Corrective Action

Do not conduct your own investigation of potential wrongdoing because you may compromise the integrity of a Company investigation, inadvertently waive a Company right or jeopardize a potential insurance claim. Please report even suspected violations in accordance with the requirements of these Standards. All reports of potential violations will be promptly assessed and, if warranted, investigated in accordance with procedures established pursuant to these Standards. Everyone is required to fully cooperate in any investigation.

When a reported violation is substantiated, the Company will take measured and appropriate action to address the situation, such as enhance internal controls or make procedural changes. In some cases, the action may include termination of employment or directorship, referral to law enforcement or other governmental agencies, and even civil action. The Company will apply these Standards to everyone equally, without regard to who may be involved, the level of that person within the Company, or the potential impact that may result from the fair, consistent and equal application of these Standards. We value our integrity and ethics over any one individual or over any business opportunity.

B. Confidentiality

The Company will, to the extent practical and appropriate under the circumstances and in accordance with all laws and regulations, keep confidential the identity of anyone it becomes aware of that reports a suspected violation or who participates in any such investigation.

On a case-by-case basis and where it is deemed necessary to achieve a legitimate business need, the Company may also request that anyone who becomes aware of an ongoing or completed internal investigation not discuss the facts or circumstances upon which such allegations are based with anyone except for those persons directly involved in conducting such internal investigation or as permitted or required by law.

Notwithstanding anything herein to the contrary, (a) the non-disclosure obligations in these Standards shall not prohibit or restrict anyone from communicating with any other state or federal regulatory authority, and (b) the Company shall not enforce or threaten to enforce, any confidentiality agreement or other similar agreement, or take any other action against any officer, director or employee for engaging in the types of communications described in (a) above. You do not need the prior authorization to make any such reports or disclosures and you are not required to notify the Company that you have made such reports or disclosures.

XI. Other Policies, Procedures and Questions

Our Company has many other policies and procedures addressing a variety of subjects which affect the operations of the Company and the day-to-day activities of its employees. These include the Employee Handbook, policies, procedures and statements of standards regarding the making of loans, the gathering of deposits, the administration of business transactions, and the advertising and promotion of Company products and services. You must become familiar with such policies and procedures and adhere to their requirements. You may be expected to acknowledge your understanding of such requirements in writing.

If you have any questions about these Standards, your first question should, when appropriate, be directed to your immediate supervisor. Your supervisor understands his or her obligations under these Standards. If you are not satisfied with your supervisor's response to your question, or are otherwise uncomfortable with asking your supervisor directly, you may contact the Human Resources Department, the Chief Risk Officer, the Chief Compliance and Operational Risk Officer or the Fraud and Ethics Manager. You may also utilize the Compliance and Ethics Hotline toll-free at 855-241-1901 or on-line at www.ltxb.ethicspoint.com. You may even do so anonymously if you so desire.



XII. Conclusion

Our Company will always conduct business with transparent integrity by agreeing with each other that the products and services we deliver to our customers will be offered beyond reproach, both ethically and legally. We will compete and succeed in this industry by exceeding our customers' expectations in ways that

our employees will be proud of, our shareholders can benefit from, and our regulators can hold out as an example to the industry.

Doing your part to help us collectively accomplish our objectives will make you a proud, integral part of the LegacyTexas family.

