

SEACOAST NATIONAL BANK

CODE OF CONDUCT

Introduction

At Seacoast National Bank (SNB), we strive to provide quality products and service within the confines of ethical business practices. The strength of our company lies in maintaining mutual respect between, and within, the company and our various stakeholders, and in preserving our reputation for integrity. Our customers, shareholders and communities expect us to meet very high standards. They entrust us with their money, confidential information and important aspects of their lives.

This Code of Conduct reflects our commitment to live up to those expectations. Many of these policies are based on laws and regulations. Others are based on philosophical and ethical principles that enhance our ability to work together cooperatively and conduct our business effectively. We are all responsible for complying with both the letter and spirit of applicable laws and regulations, as well as with company policies designed to guide us in maintaining our principles. We are expected to avoid illegal, dishonest, or unethical conduct, or any other actions that might reflect unfavorably on either our own integrity or that of our company.

The provisions of this Code of Conduct will be enforced, and all employees are responsible for knowing and complying with these, as well as with the Associates Handbook and with any additional standards set by the division and respective department in which you work. Failure to do so, or conduct in violation of any law or regulation, may lead to discipline, up to and including dismissal. We may be periodically required to attest to our compliance with the Code of Conduct.

We should all work to create an atmosphere that supports respect, integrity, teamwork, and excellence, and we should be proud of our company. Employees

who become aware of any behavior by another employee that is in conflict with either the spirit and letter of the Code of Conduct are urged to discuss the matter either with their manager, Compliance Officer, Human Resources Department, or report the occurrence to the Chief Auditor. The situations will be appropriately and confidentially investigated, to the extent possible. There will be no retaliation against employees who report information in good faith.

Social Conduct and Bank Commitments

As bankers, employees are required to conduct themselves in a manner that will not damage the reputation of the Bank, or the employee, through the perceptions of our shareholders, coworkers, community and our families. At times, the Bank will sponsor events, including after-hour meetings and employee celebration events, management retreats, customer dinners or socials, private banking events, and community/civic functions, where the social nature of the event may include the serving of alcohol. Employees who participate in these events, and choose to drink alcohol, do so with the expectation that they will drink in moderation and will be accountable for their actions under the Code of Conduct.

Employee participation in off-hour events is seen as a very important leadership activity that builds relationships with customers and employees. At times, the scheduling of these events can come into conflict with the employee's responsibilities and commitments to their family. As a family-first workplace, the employee's commitment to their family obligations will be the priority. Should a schedule conflict arise that creates difficulty at home, the employee has the right to not participate or shorten their attendance at this function. In these cases the employee should notify their manager in advance of the conflict, so a substitute bank representative can be identified.

Relationship With Customers

Confidence

Confidential information with respect to customers obtained through employment with SNB is considered privileged and is to be held in strictest confidence. It is to be used solely for corporate purposes. Confidential information shall not be given to persons outside SNB, including family or associates, or even to other associates of SNB who have no need for the information in discharging their duties. (See Customer Financial Records Privacy Policy). "Confidential information" generally consists of financial and personal information learned about customers through their accounts, records on file with the bank or personal conversations with customers."

Confidential information concerning customers may in some instances be considered "inside information", which, if used or disclosed, could subject the associate, SNB and a person outside the corporation to whom the information is communicated, liable under federal and state securities laws.

Associates who end their employment with the Bank are strictly prohibited from removing or disclosing any customer information, materials or documents that are consider the Bank's property, as these are considered proprietary resources and are not the property of the associate. Should it be discovered that the associate has committed a breach of this policy, the Bank will take remedial action, up to an including legal measures to recover any form of proprietary information and property. To protect customer relationships with the Bank, specific Bank Officers may be placed under specified non-competition/non-disclosure rules, where this policy has a definitive effective period from the date of termination.

Gifts

It is a federal criminal offense for anyone to give, offer or promise anything of value to another with the intent to influence or reward an employee of a financial institution in connection with any specific business or transaction which benefits the Bank, customer or third party.

It is illegal for any financial institution associate to solicit or demand, for themselves or for any other person, or to accept anything of value with the intent to be influenced or rewarded in connection with any specific business or transaction which benefits the Bank, customer or third party.

An individual or employee representing SNB shall not provide any gift of more than nominal value to any individual or company in consideration for doing business with SNB as a customer or supplier of services. However, normal business entertainment of customers and suppliers is appropriate. Premiums such as those offered for opening new accounts may be provided in conjunction with a new business campaign, and promotional materials of reasonable value may occasionally be given to customers or others.

No individual representing SNB shall accept any gift of more than nominal value (\$50) or any fee from an actual or potential customer or supplier in connection with any specific transaction or business with SNB. Normal business entertainment and meals, refreshments, travel arrangements or accommodations offered in connection with business meetings or to foster better business relations or goodwill may be accepted if reasonable in amount. Gifts or favors based on obvious personal or family relationships are permissible when circumstances make it clear that it is the personal relationship, rather than the business of SNB that is the motivating factor. Gifts of reasonable value may also

be accepted in connection with commonly recognized events, such as promotions, Christmas, weddings, births, or retirements. Discounts or rebates on merchandise or services should not be accepted from SNB customers or suppliers except to the extent they are available to all employees or to other customers. In no instance shall any gifts, offers of entertainment or favor be accepted if acceptance could jeopardize public confidence in the bank or create undesirable obligations. When in doubt, consult with your supervisor.

Whenever any individual representing SNB is offered or receives something of value beyond what is permitted by the preceding, the gift or favor shall be reported to the Chief Auditor or an Executive Officer. Such disclosure helps to show the individual's good faith and will help protect the individual from being implicated in circumstances that may suggest corrupt intentions or breach of trust. Any gift of more than reasonable value should be returned. When an individual is in doubt as to whether a particular gift or favor may be accepted or retained, the Chief Auditor may be consulted for a written determination.

An associate should not accept a bequest or legacy from a customer unless the customer is a relative of the employee.

Business and Family Relationships

An associate, who individually holds, or holds through members of their immediate family, a financial management interest in a corporation, trust or business unrelated to SNB shall not in his/her capacity as an associate, exercise any discretionary authority whatsoever with respect to any loan or other transaction between that business and SNB.

When acting for SNB an associate shall not exercise any discretionary authority whatsoever with respect to any loan, sale or other transaction between SNB and his/her immediate family.

Fiduciary Appointment

Fiduciary appointments, such as executor, administrator, guardian, trustee, testamentary trustee, etc., may only be accepted for family members. Exceptions to this policy requires written approval from an associate's manager and the Executive Officer.

Associates may not accept appointments as attorney-in-fact under general powers of attorney if a power of attorney is so general as to allow them to use their own discretion in handling customer funds. Exceptions to this policy may only be made if appointment as attorney-in-fact is part of a formal company

product offering or business transaction, if it is necessary to enable Trust Department employees to exercise their responsibilities in the normal course of business, or if it is for family members.

Associates may carry out customer instructions that specify handling of the customer's accounts when authorization to do so has been obtained from the customer.

Personal Loans

Associates shall not borrow from any customer of SNB (except for normal credit purchases) unless the customer is a recognized lending institution.

Rendering Non-Banking Advice to Customers

Giving legal and tax advice is the province and responsibility of practicing attorneys and tax accountants. Associates should avoid making statements which could be construed as offering advice which might have legal or tax implications. Likewise, associates should avoid telling customers how to run their businesses since liability may accrue from controlling or interfering with a customer's business affairs. Referral of customers to professionals for specific advice may be made, provided several names are given and the customer understands the bank does not endorse any one of the references.

Responsibility to Investors

Disclosure; Purchase and Sale of Seacoast Stock or Other Securities

Inside information is material, non-public information relating to securities issued by any corporation. Information is considered "material" if it is important enough (1) to affect the judgment of investors about whether to buy, sell, or hold stock; or (2) to influence the market price of the stock. Examples of "material non-public information" typically would include, but not be limited to, advance information on earnings and dividend changes, equity or debt offerings, major bank credits, stock splits, mergers, significant developments regarding litigation or governmental proceedings, major impending corporate initiatives and impending significant changes in company management.

It is both a requirement of the law and company policy that no associate may use "material non-public information" in connection with any decision to purchase or sell or to recommend the purchase or sale of any security, whether on behalf of the company or for his or her own account, or to pass along such information to

any other person for the purpose of enabling that person to use it. Even if there is no actual misuse of material non-public information, employees should avoid circumstances in which it might appear that such information is being misused.

Responsibility to Associates and Officers

Management Accessibility

SNB has an open door policy which allows every associate who has a problem, complaint or is simply looking for advice to feel free to go to any level of management where they feel the problem can be solved, up to and including the Chief Executive Officer or the Chief Operating Officer.

Privacy of Records/Removal of Documents

The protection of Seacoast National Bank business information, property and all other Company assets are vital to the interests and success of Seacoast National Bank. No Seacoast National Bank related information or property, including without limitation, documents, files, records, computer files, equipment, office supplies or similar materials (except in the ordinary course of performing duties on behalf of the Bank may be removed from the Company's premises. In addition, when an employee leaves Seacoast National Bank, the employee must return to the Company all Seacoast National Bank related information and property that the employee has in his/her possession, including without limitation, documents, files, records, manuals, information stored on a personal computer or on a computer disc, supplies, and equipment or office supplies.

Violation of this policy is a serious offense and will result in appropriate disciplinary action, up to and including discharge.

Code of Conduct/Confidentiality

SNB will endeavor to safeguard the privacy of its associates and confidentiality of associate records by advising associates of all personnel records maintained on them, collecting only data related to the purpose for which the files were established and allowing those authorized to use a file to do so only for legitimate SNB purposes. Associates will be allowed to inspect, and challenge for correction as necessary, information in their personnel files, excluding confidential letters of recommendation, material relating to other employees, investigator materials and audit documentation. Removal of official documents

or equipment from bank premises, without the express consent of a supervisor or department head, is prohibited.

Banking Services

As part of their total compensation, associates may be provided certain banking services at less than the standard charges for such services to the public, and loans may be granted to them at employee rates to meet normal credit needs. However, the credit criteria for the granting of such loans shall be the standard criteria for loans to regular SNB customers.

Responsibility of Associates, Officers and Directors

Treatment of Employees

SNB's policy is that the workplace should be free of harassment and discrimination based on race, color, religion, sex, national origin, age, or any other basis provided by law.

Specifically, all forms of harassment are prohibited by this company and it is against the law. Everyone associated with the bank should be aware of the following:

- what harassment is;
- what steps to take if harassment occurs; and
- no retaliation for reporting what is believed to be harassment is allowed.

Please refer to the Sexual and Other Forms of Harassment section of the Associates Handbook, which provides details on the bank's policy on Sexual Harassment.

Outside Activities

Participation by associates in civic, cultural, religious and charitable activities is encouraged.

Associates should not have outside interests that materially encroach on the time or attention which should be devoted to their duties, adversely affect the quality of work performed, compete with the activities of the bank, imply sponsorship or support of SNB on behalf of the outside employment or organization or adversely affect the reputation of SNB.

It is important for every citizen to take an active interest in the political and governmental process. Associates are encouraged to keep themselves well informed concerning political issues and candidates and to take an active interest in all such matters. In all cases, associates participating in political and civic activities do so as individuals and not as representatives of SNB. In addition, campaigning for oneself or for other candidates should not impair the associate's time commitment to performing their job. Associates may hold part-time elected positions with management approval if such positions do not conflict with the performance of their jobs.

Approval from the Executive Officer is required prior to an associate accepting any fiduciary responsibility for any firm, corporation or person (other than a member of the employee's immediate family). The Executive Officer would need prior approval from the Board of Directors.

Prior approval of speeches or articles is required if the material reflects, discusses or discloses company policy, in which case the material should be reviewed and approved by the Chief Operating Officer and/or the Chief Executive Officer or his designee.

No associate may use his or her position with SNB to advance personal business or financial interest. All potential conflicts of interest, including those in which an associate has been inadvertently placed because of business or personal relationships with customers, suppliers or competitors, should be reported immediately to an Executive Officer. Their Executive Officer shall maintain a record of such report for the protection of SNB and the associate.

Other Employment

SNB's policy on other employment follows the general guidelines involving outside activities which basically prohibits outside employment that conflict with an associate's duties and responsibilities to the bank. Although outside employment is not encouraged, management may grant an associate approval prior to undertaking outside employment on a case by case basis.

Membership on Boards of Directors of Other Organizations

From time to time associates of SNB are privileged to serve on public and quasi-public organizations - such as housing or industrial development authorities. This service is beneficial to our reputation, is beneficial to our business and, more importantly, is beneficial to the public interest involved. It is our policy to support such activities.

Occasionally, however, the interests of those public bodies and of SNB become involved with one another, as for example, when the public body seeks bank financing. Under such circumstances SNB should be available as sources of credit and other financial services on an objective, competitive basis. To avoid any appearance of a conflict, however, the associate should not participate in negotiating or consummating the transaction with respect to either party, and the records of other parties should clearly reflect that abstinence. Associates should be vigilant to avoid any conflict that could arise by membership in such organizations.

Additionally, associates of SNB should not serve on the Board of Directors of a profit making organization unless they have received the prior written consent of the Executive Officer. The Executive Officer would need prior written consent of the Chief Operating Officer and/or the Board of Directors in order to serve on the Board of Directors of a profit making organization.

Finally, an Officer of account should not serve on the Board of Directors of his or her customer without the prior written consent of an Executive Officer.

Speeches, Teaching Activities

It is entirely appropriate that associates represent the bank by giving speeches, making presentations or teaching. In many cases the organization involved will pay expenses. If, however, the bank is to bear the expenses for such an activity, then the employee should secure the permission of their department manager before accepting such an engagement.

If teaching or speaking activities are undertaken as a representative of the bank, associates should make their Executive Officer aware of these activities in advance. Associates should not request honoraria or payment if the service is provided on company time. If, however, an honorarium or payment is made, associates may accept it.

Appropriation of Business Opportunities

No associate shall take for himself or give to another, an opportunity which belongs to SNB. This would violate the associate's duty of loyalty to the Bank. Whenever the bank has been seeking a particular business opportunity, or the opportunity has been offered to it, SNB funds or personnel have been used in developing the opportunity, the opportunity shall rightfully be that of SNB.

Personal Finances

Associates are expected to maintain their personal financial affairs in a manner which will favorably reflect on the reputation of SNB. Associates that experience problems in maintaining their bank accounts or personal finances in good standing should make their manager aware of these difficulties, and seek assistance from the appropriate Bank Officer(s) who may be able to guide decision making or create solutions that would correct the problem. Bank Officers, who experience financial problems and are in positions to advise customers in their financial matters and/or manage customer accounts through their assigned authorities, are required to notify their Executive Officer of their problems and action plans to resolve these issues. Financial problems that would create operational and/or financial risk to the Bank, or reputation risk with Bank customers are to be raised to the HR Director for review. Any exceptions to this policy, where circumstances are out of the employees control and any risk can be mitigated, can be approved by the Chief Operating Officer.

Associates shall maintain their personal accounts responsibly and keep them in good standing. Associates shall not process any transactions or account maintenance on their own personal accounts, or on the accounts of immediate family members.

Associates shall not invest for themselves or members of their immediate family, in the stock or business of a customer, unless such investment has been approved by an Executive Officer. Participation in partnerships, joint ventures or other joint business enterprises in which an SNB customer is a general partner also requires the prior approval of an Executive Officer.

Each major policy-making officer of SNB is required to be familiar with the reporting requirements of Regulation "O" and with reporting requirements with respect to outside business interests.

Purchase of SNB Property

Associates and their immediate families, whether acting individually or in a fiduciary capacity, are not permitted to sell assets or to purchase assets from SNB or any trust account being administered by SNB, unless such sale or purchase has been approved in advance by the Executive Officer, or unless such assets are being offered at public sale or public auction, or the purchase or sale has been approved by a court having jurisdiction over the transaction. Sale or purchase of SNB assets by the Executive Officer requires prior approval by the Chief Operating Officer and/or the Board of Directors.

False or Misleading Remarks

False malicious or misleading remarks must not be made about vendors, customers, competitors or others associated with the bank. False statements regarding the bank's financial condition is strictly prohibited. False, misleading or incomplete statements to auditors, examiners or other investigators are considered the same as falsification of records.

Corporate Information Security

Information about SNB's business operations is a valuable company asset. Great care must be exercised to ensure that such information is safe, confidential and accessible only to authorized users. It is the responsibility of all associates of the bank to protect the confidentiality of the bank's, customers' and vendors' financial, technical and other trade secret information. Financial, personal and other sensitive information about current or former customers and individuals associated with the bank should receive the same care and security as funds or valuable physical property.

All individuals associated with SNB must not use their positions to obtain information or services for unauthorized purposes. Those who knowingly access, disclose, modify, copy or destroy bank or other protected information without prior approval or for improper purposes are in violation of the bank's information security policies.

The Customer Financial Records Privacy Policy provides details on the policy and procedures on safeguarding customer data.

Internet E-Mail

The internet is a portal to a vast audience. Communications on the Internet, whether directly or indirectly, can influence the public's attitude toward SNB. E-mail on the internet should be considered a public, visible postcard, without any security. Therefore, only correspondence suitable for review by the public may be distributed outside SNB via e-mail on the internet. Usage of internet e-mail through the bank is restricted to work-related functions. Questions about internet security should be addressed to the Chief Information Officer, Chief Auditor or the Compliance Officer.

The Microcomputer End User Policy provides details on the policy and procedures involving local area network electronic mail.

Accounting, Record keeping and Investigation

SNB complies with the relevant accounting, record keeping and internal control requirements of the Securities and Exchange Act of 1934, as amended; the Foreign Corrupt Practices Act of 1977; the financial reporting requirements of generally accepted accounting principles and regulatory requirements. The bank is required to maintain books and records that accurately and fairly reflect, in reasonable detail, transactions and dispositions of assets.

To assure the integrity of the bank's accounting records, all entries to the company's books must be prepared with care and must be supported by adequate documentation to provide a complete, accurate and auditable, record of transactions they describe. Associates are responsible for implementing SNB's accounting, record keeping and internal control policies.

Bank policy prohibits any arrangement that results in making knowingly false or misleading entries in company books or records. Under no circumstances should funds, assets or liabilities of the organization be concealed or hidden. Associates having information or knowledge of any unrecorded or mis-recorded funds, assets or liabilities or any prohibited act must promptly report the activity to the Chief Auditor.

Use of SNB Name

Unless authorized by Executive Management, no associate shall, through activities, statements or otherwise represent or imply SNB sponsorship or approval of any political, social, religious or business activity or cause.

Internal Disclosure of SNB Activities

Each associate must ensure that the established procedures for reporting activities concerning the business of SNB are followed so that the Chief Executive Officer and/or the Chief Operating Officer will be aware at all times of all material matters pertaining to or impacting the operation of the bank. Additionally, each associate is obligated to see that the necessary information concerning any activity within the organization reaches the appropriate level, and exceptions to policy as well as management overrides are properly approved and reported.

Social Networking Policy

Seacoast National Bank takes no position on your decision to start or maintain a blog or participate in other social networking activities. However, it is the right and duty of the company to protect itself from unauthorized disclosure of

information concerning the Bank. Seacoast National Bank's social networking policy includes rules and guidelines for company-authorized social networking and personal social networking and applies to all executive officers, board members, management and associates.

General Provisions

Blogging or other forms of social media or technology include but are not limited to video or wiki postings, sites such as Facebook and Twitter, chat rooms, personal blogs or other similar forms of online journals, diaries or personal newsletters not affiliated with Seacoast National Bank.

Unless specifically instructed, employees are not authorized and may not speak on behalf of Seacoast National Bank or attribute any personal statement to the bank. Employees may not publicly discuss clients, products, employees or any work-related matters, whether confidential or not. Employees are expected to protect the privacy of Seacoast National Bank, its employees and clients and are prohibited from disclosing personal employee and non-employee information and any other proprietary and nonpublic information to which employees have access. Such information includes but is not limited to customer information, trade secrets, financial information and strategic business plans.

Authorized Social Networking

The goal of authorized and permissible social networking and blogging is to become a part of the industry conversation and promote web-based sharing of ideas and exchange information. Authorized social networking and blogging is used to convey information about company products and services, promote and raise awareness of the Seacoast National Bank brand, search for potential new markets, communicate with employees and customers to "brainstorm", issues or respond to breaking news or negative publicity, and discuss corporate, business-unit and department-specific activities and events.

When social networking, blogging or using other forms of web-based forums, Seacoast National Bank must ensure that use of these communications maintain our brand identity, integrity and reputation while minimizing actual or potential legal risks, whether used inside or outside of the workplace.

Employer Monitoring

Employees are cautioned that they should have no expectation of privacy while using the Internet. Your postings-can be reviewed by anyone, including Seacoast National Bank. Seacoast National Bank reserves to right to monitor comments or discussions about the company, its employees, clients and the industry, including products and competitors, posted on the Internet by anyone,

including employees and non-employees. Seacoast National Bank uses blog-search tools and software to monitor forums such as blogs and other types of personal journals, diaries, personal and business discussion forums, and social networking sites.

Employees are also cautioned that they have no expectation of privacy while using company equipment, computers, phones or facilities for any purpose, including authorized blogging. Such devices may be monitored by the Bank.

Seacoast National Bank reserves the right to use content management tools to monitor, review or block content on company blogs that violate company blogging rules and guidelines.

Rules and Guidelines

The following rules and guidelines apply to social networking and blogging when authorized by the employer and done on company time. The rules and guidelines apply to all employer-related blogs and social networking entries, including employer subsidiaries or affiliates. This includes Officers designated by the CEO, Chief Risk Officer and /or Marketing Director to serve as a spoke person to a specific subject or inquiry.

Only authorized employees can prepare and modify content for Seacoast National Bank's blog and/or the social networking entries located on www.seacoastnational.com. Content must be relevant, add value and meet at least one of the specific goals or purposes developed by Seacoast National Bank.

All employees must identify themselves as employees of Seacoast National Bank when posting comments or responses on the employer's blog or on the social networking site.

Any copyrighted information where written reprinted information has not been obtained in advance cannot be posted on Seacoast National Bank's blog.

Business units and departments are responsible for ensuring all blogging and social networking information complies with Seacoast National Bank's written policies. Department managers are authorized to remove any content that does not meet the rules and guidelines of this policy or may be illegal or offensive. Removal of such content will be done without permission of the blogger or advance warning.

Seacoast National Bank expects all guest bloggers to abide by all rules and guidelines of this policy. Company reserves the right to remove, without advance notice or permission, all guest bloggers' content considered inaccurate or offensive. Seacoast National Bank also reserves the right to take legal action against guests who engage in prohibited or unlawful conduct.

Personal Blogs

Seacoast National Bank respects the right of employees to write blogs and use social networking sites and does not want to discourage employees from self-publishing and self-expression. Employees are expected to follow the guidelines and policies set forth to provide a clear line between you as the individual and you as the employee.

Seacoast National Bank respects the right of employees to use blogs and social networking sites as a medium of self expression and public conversation and does not discriminate against employees who use these media for personal interests and affiliations or other lawful purposes.

Bloggers and commenters are personally responsible for their commentary on blogs and social networking sites. Bloggers and commenter's can be held personally liable for commentary that is considered defamatory, obscene, proprietary or libelous by any offended party, not just Seacoast National Bank.

Employees cannot use employer-owned equipment, including computers, company-licensed software or other electronic equipment, or facilities on company time, to conduct personal blogging or social networking activities. This activity should be done off hours and off site.

Employees cannot use blogs or social networking sites to harass, threaten, discriminate or maliciously disparage any Bank employees or anyone associated with or doing business with Seacoast National Bank.

If you choose to identify yourself as a Seacoast National Bank employee, please understand that some readers may view you as a spokesperson for Seacoast National Bank. Because of this possibility, we ask that you state that your views expressed in your blog or social networking area are your own and not those of the company, nor any person or organization affiliated or doing business with Seacoast National Bank.

Employees cannot post on personal blogs or other sites the name, trademark or logo of Seacoast National Bank or any business with a connection to Seacoast National Bank. Employees cannot post company-privileged information, including copyrighted information or company-issued documents.

Employees cannot post on personal blogs or social networking sites photographs of other employees, clients, vendors or suppliers, nor can employees post photographs of persons engaged in company business or at company events.

Employees cannot post on personal blogs and social networking sites any advertisements or photographs of company products, nor sell company products and services.

Employees cannot link from a personal blog or social networking site to Seacoast National Bank's internal or external web site.

If contacted by the media or press about their post that relates to Seacoast National Bank business, employees are required to speak with their manager first. Any response to the media will be approved by the Executive Officer and Marketing Director, both in terms of approving the need to respond and the content of the response.

If you have questions relating to this policy, your personal blog or social networking, ask your manager or supervisor.

Reporting Violations

Seacoast National Bank requests and strongly urges employees to report any violations or possible or perceived violations to supervisors, managers or the HR department. Violations include improper discussions of Seacoast National Bank and its employees and clients, any discussion of proprietary information and any unlawful activity related to blogging or social networking.

Discipline for Violations

Seacoast National Bank investigates and responds to *all* reports of violations of the social networking policy and other related policies. Violation of the company's social networking policy, as part of the Bank's code of conduct, will result in disciplinary action up to and including termination. Discipline or termination will be determined based on the nature, severity and other relevant factors of any blog or social networking posted. Seacoast National Bank reserves the right to take legal action where necessary against employees who engage in prohibited or unlawful conduct.

Relationship With The Community

The following provisions of the code cover general guidelines on some of the more significant laws and regulations which SNB strongly adheres to in its relationship with the community.

Compliance with Laws

SNB and its associates will comply with all applicable laws, rules and regulations. In instances where the proper and ethical course of action is unclear, counsel from

attorneys and others will be sought. In no instance shall anyone engage in a course of action which, if it were made public, would be of embarrassment to SNB. The integrity of each staff member is of utmost importance.

Americans with Disabilities Act

SNB is committed to serving the needs of all customers and employees and fully supports compliance with the Americans with Disabilities Act (ADA). The goals and objectives of the ADA enhance the quality of our society and strengthen the American economy through businesses reaching out to and including all segments of the population.

Although even the best efforts of the business community will not remove every barrier faced by all people with disabilities, meaningful efforts to do so will offer many more opportunities to participate fully in the economic and social mainstream.

Any concerns in this area may be directed towards the Human Resources Director or the Compliance Officer for further information.

Affirmative Action Policy: Fair Lending and Equal Employment

In accordance with SNB's Loan Policy, all credit decisions are to be made without regard to race, color, national origin, religion, sex, age, marital status, sexual orientation, disability, or any other factors prohibited by law. This commitment is fulfilled while maintaining prudent credit discipline and achieving acceptable return for the shareholders.

SNB recognizes that affirmative steps must be taken to ensure that this principle is applied consistently and continuously throughout all aspects of our credit operation, including product design, marketing and advertising, underwriting, appraisal, training, compensation and performance evaluation. Procedures have been established to ensure that bank wide operations reflect SNB's commitment to fair lending and that employees are duly informed of this commitment.

An essential element in building a diverse, inclusive environment is the bank's equal employment opportunity policy. It prohibits discrimination and harassment in all business activities on the same basis as its fair lending policy. Details of the bank's policy on equal employment are discussed in the Associates Handbook.

SNB believes that diversity in perspective, experiences and ideas brings strength. Fostering an environment that recognizes and respects differences has a direct effect on the bottom line; it motivates people, promotes innovation,

encourages risk-tasking, creates additional revenue opportunities, and increases productivity; all of which link to the company's business goals. Through diversity, the bank is able to better understand and meet the business needs of its customers in an increasingly diverse world.

Purchase of Favored Treatment/Political Contributions

The intent of the Anti-Kickback Act of 1986 is to eliminate the use of kickbacks or other fees or benefits by or between contractors or subcontractors or their employees in connection with the award or performance of contracts and subcontracts involving the federal government. In the same light, bank policy prohibits offering, giving, soliciting or accepting bribes, kickbacks, extraordinary commissions, or other things of value for the purchase of favored treatment or regard of favored treatment by governments, other businesses or individuals.

Fees or commissions must be paid only for clearly stated business purposes. Hospitality of meals, business meetings and social events may be extended by bank employees if it is appropriate to the situation and would not compromise the company, the employee or the recipient.

Political Contributions

Federal law prohibits all corporations from making federal political contributions and prohibits national banks from making contributions to federal, state or local candidates for election. In addition, various state laws further limit the ability of corporations to make political contributions. Where lawful, the company may make contributions concerning civic or governmental issues in which the company has a particular interest only after receiving both an opinion of legal counsel that the contribution is lawful and the prior approval of the Chief Operating Officer.

Selection of Vendors

The services of brokers, dealers, lawyers, consultants and other professionals are to be chosen on the basis of qualifications, quality, price and benefit to SNB, and not merely on personal or customer relationships. Accordingly, the use of family members and relatives to perform services for the company without prior management approval is prohibited

Bribes

It is SNB's policy to fully comply with the anti-bribery provisions of the Foreign Corrupt Practices Act which makes it a criminal offense for any U. S. enterprise

to offer a bribe to a foreign official, foreign political party, party official or candidate for political office for the purpose of obtaining, retaining or directing business to any person, whether or not that person is the one making the bribe. A bribe may take the form of an offer, payment, promise to pay or authorization of the payment of money or anything of value.

Antitrust Consideration

Activities that violate or appear to violate antitrust laws must be avoided. Tie-ins and exclusive dealings involving bank and non-bank products need to be carefully reviewed with Executive Management and the Compliance Officer to prevent violations of the anti-tying laws and regulations for national banks. Also, antitrust laws prohibit discussing rates, costs and market information with competitors or making arrangements with them that affect prices, services or other competitive policies and procedures.

Community Reinvestment Act

Corporate responsibility to its communities has been an integral part of SNB's business. The bank's commitment is a strategic, integrated effort that involves business units throughout the organization. A significant amount of time and effort is spent assessing the composition and needs of the bank's community, particularly those in the low to moderate income levels.

In addition, SNB, and its associates, actively participates in a variety of socio-civic organizations that give back to the community.

SNB's long-term goal is to enrich the quality of life in the communities where it does business and build relationships of value by providing economic opportunities.

Environmental Commitment

The protection and enhancement of the environment is a responsibility shared by individuals, institutions, governments and the private sector. SNB is committed to weighing environmental considerations in its business decisions and striving to integrate the environmental and economic concerns of its constituents. SNB seeks to conduct business in a manner consistent with its environmental principles. These principles are designed to bring an environmental ethic to various areas of the organization - recycling, real estate management, and different forms of community involvement.

Relationship With Bank Regulators

In order to merit the confidence of the public and of those agencies which regulate SNB, there must be complete candor in our dealings with the regulatory agencies. Each associate must respond completely and accurately to all questions by the regulatory agencies, the bank's outside independent auditors, members of the internal audit department or any internal control/review committees. No adverse data in response to any question should be concealed.

Administration of Code

Compliance Guidance

If an individual is unsure whether a situation or certain conduct may constitute a violation of this code, the Chief Executive Officer and/or the Chief Risk Officer and/or an Executive Officer should be consulted for guidance. Additionally, the Human Resources Director, Chief Auditor or Compliance Officer may also be consulted.

Penalties for Non-compliance

Violations of this code are grounds for disciplinary action up to and including termination, even for a first time offense.

Reporting Unethical Practices and Possible Crimes

Associates are encouraged to report, without fear of reprisal, suspected illegal or unethical activities. Under federal law, any company can be held criminally liable when one of its employees, directors or agents commits a crime. Accordingly, any SNB associate who has knowledge or information about conduct by another employee, director or agent of the bank that he or she believes, in good faith might be a crime or is unethical - whether or not the bank is victimized - must promptly report the relevant facts to any of the following who is not a party to the act: Department Manager, Executive Manager, Human Resources Director, Chief Auditor/Compliance Officer, Chief Risk Officer, Chief Executive Officer or the Board of Directors/Chairman, Audit Committee.

Associates are, however, cautioned against making frivolous or unfounded accusations. Employees may seek additional information on this subject by

contacting the Human Resources Director.

Any associate who is asked to perform or witness a banking transaction, recordkeeping practice, or decision making event that could be considered unethical or a violation of bank policy or procedure, is required to report this as a complaint. Such reporting will be handled with the highest confidentiality, where employees have the right to report any findings on an anonymous basis, and can do so without concern of any retaliation. The complaint must be made in writing and addressed to both of the following parties:

Maria Frias
Chief Auditor
Seacoast National Bank
PO Box 394
Stuart, FL 34995

Christopher Fogal
Chairman, Audit Committee
Seacoast Banking Corporation
c/o Christopher Fogal, CPA
603 N. Indian River Dr.
Suite 300
Fort Pierce, FL 34950

Complaints received by the Chief Auditor and Chairman of the Audit Committee will be promptly investigated and resolved.

Associates who do not feel comfortable discussing a business ethics issues with their supervisor, or the Bank's Chief Auditor/Compliance Officer or Audit Committee Chairman; you may call **The Network**, an independent company which provides an anonymous reporting service for hundreds of companies worldwide. This service is toll-free; 24 hours a day; 7 days a week. It's an option that is always available to associates that want to help, but prefer not to give their name.

**“THE
NETWORK”**

Seacoast National Bank's confidential hotline to report
accounting and auditing related complaints

1-866-908-7247

Some common examples of business conduct issues where associates are required to report the incident to their supervisor:

- Accounting and auditing irregularities
- Theft and fraud
- Conflicts of interest
- Securities matters
- Insider trading
- Destroying, altering, or falsifying company records
- Disclosure of proprietary information

Here's what happens when you call **The Network**:

- 1) Associates are greeted by a friendly Interviewer, who documents the situation in detail. Associates don't have to give their name and the call is not recorded.
- 2) The Interviewer assigns a report number to the associate and asks them make one call back.
- 3) The information is then relayed to the Bank's management to investigate the concern. This information will first be received by the Chief Auditor/Compliance Officer.
- 4) Using the report number and scheduled call back date given to the associate by the Interviewer, the associate calls for the follow-up. You may be asked additional questions or ask to add any additional information at this time.

Why is ethical business conduct so important?

High standards are more than a slogan or catch phrase – they are a way of doing business; Seacoast Banking business!

Maintaining high standards means conducting business ethically and legally. Our adherence to these standards is a key component in building a reputation for excellence and integrity.

Why care about business ethic issues?

Business conduct violations can result in serious consequences for individuals – even imprisonment under some circumstances. The Bank may also be financially penalized through lawsuits or claims, resulting in fines and/or restrictions placed on our business activities. But most importantly, associates should care because violations of business conduct make everyone a victim.

The negative impact on our professional reputation can be severe, and affect our relationships with our community and customers.

How can I help maintain high standards of business conduct?

Think before you act.

Ask yourself: Is it illegal? Does it violate company standards or the Banks Code of Conduct? Could it cause loss or harm to you, co-workers, the Bank, shareholders, customers or companies you are doing business with? Would you feel uncomfortable if everyone knew what you did?

If you answer “yes” to any of these questions, the action is very likely wrong, and you should avoid it. If the answers are not clear, don’t take a chance. Talk with your supervisor immediately. When you think before you act, and make the right decision, you uphold high standards and serve as a good example for others to follow!

Speak up!

Use Peer Influence. If you see or suspect business conduct violations, don’t ignore the situation. Say something to express your concern. Your influence could help prevent a friend from making a big mistake. If the situation does not improve after this; talking to your supervisors is the next step. Ignoring business conduct violations only allows for the problem to grow more costly and frustrating.

Employee Investigations

Seacoast National Bank will conduct prompt, thorough and confidential investigations when reported regarding employees who are alleged to be involved in matters dealing with violations of bank policy and procedure involving loss or possible theft of money or proprietary information, breaches in confidentiality and/or security that create liability for the bank, harassment allegations and any matter that represent a significant violation of bank code of conduct and business ethics.

Employees who are determined to be relevant parties or witnesses in the matter under investigation are required to fully participate and offer assistance in the process. Any employee refusing to do so, or who take deliberate action to undermine the investigation, provides false information, or who breach confidentiality will be subject to disciplinary action, including termination. Exceptions to breaches in confidentiality will be granted to employee who obtain

legal council during the investigation (where information can be shared with the attorney when client/attorney confidentiality privileges exist.)