

# Argent | Code of Ethics

## Policy Statement

Argent Financial Group expects and requires all officers and employees to act in a responsible, respectable, legal, ethical and moral manner at all times, avoiding any conflict of interest with their responsibilities to Argent Financial Group. The term employee includes board members, officers, employees, agents and other institution-affiliated parties. The way we conduct ourselves will determine to a large extent the confidence which our investors, directors and shareholders have in Argent Financial Group as a whole, and in us as individuals.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee, or a relative of the employee, as a result of Argent Financial Group's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

In many cases, it is as important to avoid the appearance of a conflict, as it is to avoid the conflict itself. Guidelines for avoiding conflicts of interest include:

### ■ Acceptance of Gifts and Fees

Employees may accept small gifts or other items of value from business associates of Argent Financial Group, as long as they are properly disclosed, and the dollar value is considered nominal. Gifts valued up to \$50 may be accepted without prior approval. Gifts exceeding \$50 must receive the approval of the Board of Directors before acceptance.

The solicitation or acceptance of commissions, fees or anything of monetary value by a company employee for personal benefit or the benefit of a relative of the employee from customers, vendors, or suppliers or any other source, is highly improper and, in some cases, illegal. This policy does not prohibit gifts given for reasons of personal affection and esteem of a value so small they could not reasonably be construed to influence a business decision.

### ■ Political Activities

Employees may accept small gifts or other items of value from business associates of Argent Financial Group, as long as they are properly disclosed, and the dollar value is considered nominal. Gifts valued up to

\$50 may be accepted without prior approval. Gifts exceeding \$50 must receive the approval of the Board of Directors before acceptance.

### ■ External Business Interests

No employee may have any personal financial dealings with any individual or business organization, other than a regulated financial institution, that furnishes merchandise, supplies, property or services to this company. This includes arrangements to receive loans, commissions, royalties, property interests or anything of value. No employee should maintain an investment in any such business.

Business dealings with outside firms should not result in unusual gains for those firms, Argent Financial Group or the employee. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks or other windfalls designed to ultimately benefit either Argent Financial Group, the employee or both. Promotional plans that could be interpreted as unusual gain require specific executive-level approval.

No presumption of guilt is created by the mere existence of a relationship with outside firms. However, if an employee has any influence on transactions involving purchases, contracts, or leases, it is imperative that he or she discloses full information on the transaction and any actual or potential conflict of interest to an executive officer of Argent Financial Group as soon as possible so safeguards can be established to protect all parties.

This policy is not designed to discourage personal investments or thrift. It is designed to make employees aware of the priority of their commitment to the Company and to ensure that work time is not used to engage in activity that is purely for personal gain.

### ■ Fair Competition

All employees will conduct themselves in a fair and ethical manner when dealing with customers and suppliers. Under no circumstances will employees enter into arrangements with competitors which affect price or marketing policies.

It is our intent to compete aggressively and fairly in our market by providing excellent products and the highest levels of service. Management expects all employees to refrain from openly criticizing or demeaning the management, employees, policies or business practice of competitors in an attempt to attract or retain business.

### ■ Fiduciary Appointments

No employee shall accept a personal fiduciary appointment as executor, trustee, guardian or as a beneficiary under a will or testament, which develops primarily in the course of company business, unless prior approval by executive management has been obtained.

## ■ Legal Requirements

No employee will do anything in the conduct of business which would violate any federal, state or local law.

## ■ Confidential Information

The use of confidential information gained as a consequence of employment must be limited to the proper conduct of Argent Financial Group's business. No employee of Argent Financial Group may use, or permit the use of, such information for furtherance of personal interests or profit.

As a staff member, employees will be exposed to a great deal of confidential information. This information is only to be discussed with other staff members on a need-to-know basis. It is essential that our clients have unquestionable confidence in our staff and Argent Financial Group as a whole. Violations of such confidences can result in loss of business and, in extreme cases, could result in legal action taken against Argent Financial Group.

The materials, products, designs, plans, ideas and data of Argent Financial Group are the property of Argent Financial Group and should never be given to an outside firm or individual, except through normal channels and with appropriate authorization. Any improper transfer of material or disclosure of information, even though it is not apparent that an employee has personally gained from such action, constitutes unacceptable conduct. Any employee who participates in such a practice will be subject to disciplinary action, including possible termination of employment, and legal action.

## ■ Dishonest or Fraudulent Acts

It is the responsibility of each employee to bring to the attention of the appropriate person, any suspected dishonest or fraudulent act observed during the working day. In general, if an employee suspects that an individual or business with which the employee has dealt is guilty of this type of behavior, it should be reported immediately to that employee's supervisor, the Human Resources Department or the CEO. Absolutely no mention of the matter should be made to any other employees. If an employee prefers to remain anonymous, they can report their suspicions using the Ethics Hotline by calling (844) 201-9815 or by visiting [www.argentfinancial.ethicspoint.com](http://www.argentfinancial.ethicspoint.com).

If, after reporting the act, the employee is not satisfied that appropriate action has been taken, they may refer the matter directly to the Board of Directors. It is suggested that employees pursue the matter with persons in the order mentioned until satisfied that the matter has been handled in Argent Financial Group's best interest.