Excessive or Luxury Expenditures Policy

Statement of Policy and Purpose

The Board of Directors of U. S. Century Bank designed this policy to promote the highest standards of behavior with regard to the use of the assets of the "Bank" and to comply with Section 111(d) of the Emergency Economic Stabilization Act of 2008, as amended by the American Recovery and Reinvestment Act of 2009, which requires institutions receiving assistance under the Troubled Asset Relief Program ("TARP") to adopt a company-wide policy regarding excessive or luxury expenditures.

It is the policy of the Bank that corporate funds must be spent in a prudent manner to fulfill corporate purposes only and to the extent reasonably necessary or appropriate to achieve those purposes. In addition, officers, directors and employees of the Bank (each, an "Associate") are precluded from spending corporate funds in a manner that is excessive, extravagant, or otherwise creates a risk of significant damage to the Bank's reputation with its customers, stockholders, and investors, or in the communities in which the Bank conducts business.

The Excessive or Luxury Expenditures Policy is effective for all expenses or goods and services procured on or after November 5, 2009. If there is a conflict with any other existing Bank policies this policy will prevail and supersede other policies unless the Board approves an exception. Associates are required to read, understand, and adhere to this global policy as it applies to every line of business. Failure to adhere to this policy could result in the associate not being reimbursed and could further result in disciplinary action up to and including termination.

Covered Expenditures

This policy covers reasonable expenditures for

- (1) Entertainment or events
- (2) Office or facility renovations
- (3) Aviation or other transportation services
- (4) Other similar activities or events related to associate or business development, reasonable performance recognition, or other similar activities for which we provide reimbursement to associates in the normal course of business operations.

General Requirements

- (1) All expenditures covered by the policy shall be reasonable and appropriate and incurred for business development, employee development, reasonable performance incentives or similar reasonable measures conducted in the normal course of the business operations of the Bank. Renovations of offices and facilities are exempt when required for the following reasons:
 - Emergency situations, act of nature, enhancement of operating efficiency, complying with all applicable codes or guidelines(county, federal or state), ADA requirements,

- Bank Security Act, maintaining a sanitary and clean working environment, public image of the organization, employee morale and productivity.
- (2) All meetings or events attended only by senior executives officers (Executive Vice Presidents and above) and/or board members shall be devoted to specific business purposes, and participating officers and/or board members shall be personally responsible for any expenses incurred for non-business-related activities.

Prohibited Expenditures

All proposed expenditures that may be Excessive or Luxury Expenditures ("Proposed Expenditures") must serve one or more legitimate business purposes otherwise such expenditure is prohibited.

Reporting

Any changes to this Policy must be approved by the Board of Directors (or a committee designated thereby). Within ninety (90) days following adoption of the change, the revised Policy must be provided to the Department of the Treasury and the FDIC and the revised Policy shall be posted on the Bank's internet web site.

Expenditures expected to be over \$25,000 that appear to be excessive or luxury expenditures will be presented to the Board of Directors for approval in advance. Expenditures expected to be over \$10,000 that do not receive prior approval from the Board of Directors must be approved in advance by either the CEO or the CFO.

Violations of Policy

All employees have a duty to adhere to the Excessive or Luxury Expenditures Policy and to report to the Bank any suspected violations of policy. Any violation of this policy should be reported promptly by calling the Controller at (305) 715-5200. The Controller will maintain a record of reported violations and notify the Internal Audit Department within five days. The Bank forbids retaliation against employees, officers or directors who report violations of the Excessive or Luxury Expenditures Policy in good faith (except for any disciplinary action as determined above for self reported violations).

Compliance

Compliance with the policy will be monitored by the Bank's Controller. The Controller will bring any unusual items or reports of suspected violations to the attention of the Internal Audit Department within five days of discovery. The Internal Auditor will investigate any matter so reported and, upon a determination that a violation has occurred, the Board of Directors will be notified and the Bank will take appropriate disciplinary and corrective action.

Certification

The Bank's Principal Executive Officer and Principal Financial Officer (as such terms are defined by the applicable U. S. Treasury Department guidelines) shall certify, on an annual basis, that the approvals required under this policy have been obtained for each such proposed expenditure.