

Code of Ethics

LifeStore's Values

The primary business purpose of LifeStore Financial Group, LifeStore Bank and LifeStore Insurance Services, Inc. ("LifeStore") is to reach our stated goals by providing our customers and potential customers with a convenient and enjoyable financial service experience. In doing so, we help our customers in determining their financial needs and assist them in their quest to fulfill these needs. Through this proactive approach to customer service, we believe we will create a loyal customer base. LifeStore will be guided by the following four core values:

WE VALUE OUR EMPLOYEES - We seek to employ honest people with a high level of integrity who have a passion for serving others. We will compensate them fairly, provide a quality benefit package and challenge them to build on the attributes that will assist them throughout life.

WE VALUE OUR CUSTOMERS - Our customers deserve superior service and demand a relationship that not only provides but anticipates their financial needs. We want to be a part of providing services and products that allow them to ensure home and security for themselves and their family.

WE VALUE THE COMMUNITIES WHERE WE LIVE - We want to be a positive influence that supports the long term economic, social and intrinsic value of our communities. We recall our roots and desire to remain a community bank that can meet local needs.

WE VALUE OUR OWNERS - We seek to provide a level of income that will allow us to pay a superior return to our shareholders, employees and the communities we are located in. We understand that in order to grow and meet the needs of our customers that we must provide a satisfactory return.

Introduction

LifeStore aspires to be the best, most trusted and admired company in the financial services industry. To help LifeStore meet this goal, and in keeping with our core values, LifeStore has adopted this Code of Ethics (the "Code"). The Code describes LifeStore's expectations regarding business, personal and ethical conduct. Simply stated, the Code requires that we always do what is right. The Code applies to LifeStore Financial Group, its subsidiaries' employees, officers and directors.

Most of the topics and principles contained in the Code are also covered or further explained in various LifeStore policies, guidelines and procedures, including the guidelines relating to the Code located on LifeStore's corporate intranet site and those maintained by our business or staff units. The Code should be read in conjunction with such policies, guidelines and procedures.

Although the Code and LifeStore's policies, guidelines and procedures are intended to guide personal and professional day-to-day conduct, they are not intended to address every issue or situation that may arise. These materials provide basic principles and concepts to guide us in the conduct of our business. We, of course, should continue to rely on common sense, good judgment and individual character and integrity to determine proper conduct. Any person who

has questions or concerns about ethical issues or has knowledge of activities in violation of the Code should follow the process described in “Compliance Responsibilities.”

Honesty and Fair Dealing

LifeStore’s ethical standards require honesty and fair dealing. We rely on these standards to gain the trust and admiration of customers, peers and stockholders. LifeStore will compete by providing supreme customer service and innovative products and will not seek competitive advantage through unethical or illegal business practices. We will communicate openly and sincerely, and each employee, officer and director will endeavor to deal fairly with LifeStore’s customers, vendors, competitors and employees. No employee, officer or director may take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice. In short, we will do what we say we will do and communicate honestly and ethically in serving our customers and conducting business with others.

Workplace Environment

LifeStore is committed to maintaining a corporate environment evidenced by safe and professional working conditions and respect for the dignity of all employees, customers and others with whom we interact. We embrace diversity, seeking new ideas and listening to and learning from others, and appreciating the unique capabilities and contributions of each person. LifeStore provides equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind.

LifeStore also understands the importance of its relationship with our communities. We embrace our responsibility as a corporate citizen and seek to find innovative ways to achieve positive and sustainable change for our communities. We encourage all employees, officers and directors to participate in community activities; however, such activities should not conflict with or otherwise interfere with the performance of regular duties.

Compliance with Laws and Regulations

LifeStore is subject to numerous federal, state, local and international laws, rules and regulations. LifeStore has adopted various policies, guidelines and procedures to facilitate compliance with applicable laws and regulations, and conducts ongoing compliance and training sessions regarding specific subjects. Employees, officers and directors are expected to respect and comply with all applicable laws, rules, regulations, policies, guidelines and procedures.

You must not take any action, either personally or on behalf of the company that will violate any law, regulation or internal policy. Any crime or suspicious activity against or involving LifeStore must be reported to the proper authorities. You have the responsibility to report any known criminal wrongdoing to the Internal Auditor, or Chief Executive Officer or Chairperson of the Audit Committee immediately upon discovery by any means you feel appropriate, including LifeStore’s Whistle Blower Program.

Conflicts of Interest

A “conflict of interest” occurs when an individual’s personal interests interfere or appear to interfere in any way with the individual’s duties to the company or the interests of the company. A conflict can arise when an employee, officer or director takes action or has interests that may

make it difficult to perform responsibilities and duties to LifeStore objectively and effectively, or that may improperly influence individual judgment when acting on behalf of LifeStore.

Conflicts of interest include any action that advances a person's own personal or business interests, or those of others with whom the person has a personal or business relationship, at the expense of the company or in conflict with the person's obligations to LifeStore. This relates to the use of LifeStore property, information or position, for either personal gain or for use in competing with LifeStore.

A *potential conflict of interest* is a situation where assumptions have been made based on specific actions that an employee, officer, director or other affiliated person have taken that, under the then-present circumstances, could give the impression that a conflict of interest has occurred.

An *apparent conflict of interest* involves a situation where a conflict of interest or potential conflict of interest is perceived to exist regardless of whether an actual or potential conflict of interest exists. The definition recognizes that a person may perceive that a conflict of interest or potential conflict of interest exists based on evidence that may or may not be factual, verifiable or valid.

Employees, officers and directors must avoid conflicts of interest, including even the appearance that their actions could create a conflict of interest that could adversely affect LifeStore and its shareholders. Whether certain conduct, a relationship or a transaction is a conflict of interest, or may create a potential conflict of interest, may not always be clear. Any employee or officer who is aware of a conflict of interest, has a question concerning a conflict of interest, or who has a suspicion that a conflict might develop, is obligated to promptly seek assistance to resolve ethically the conflict or question.

The following policy should be followed by all employees:

- Employees may not cash checks, receive deposits/payments, open/close accounts, or handle any other type of banking transaction on their own account or for a member of their immediate family.
- Employees may not approve or make loans to themselves or members of their immediate family.
- Employee may not approve overdrafts or adjust any card limits for themselves or member of their immediate family.
- Employees may not rent a safe deposit box to either themselves or members of their immediate family. In addition, access to a box must be controlled by another authorized employee.

For purposes of this policy, immediate family is defined (by blood or law) as spouse, child, parent, sibling, relative living in the same household or an individual with whom an employee is co-habiting.

The following additional examples of conflicts are provided to clarify the scope of this Code, but are not intended to describe all situations that might be covered by this provision:

- A person who owes a fiduciary duty to LifeStore receives money or other benefits from a third party in return for LifeStore granting a loan to or purchasing property from the third party;

- A third party makes a payment or provides employment to a spouse, child, parent, sibling or business partner of an officer, director, employee or affiliated person of LifeStore to influence LifeStore's decision on a loan or other benefit to the third party;
- An employee, officer, director or other person who owes a fiduciary duty to LifeStore advocates a transaction between LifeStore and a company in which such person owns stock or serves as an officer or director.

Every position at LifeStore involves a degree of trust and responsibility which would be compromised if an employee were to use their position with us to benefit personally from LifeStore's relationship with a client, customer or supplier.

Gifts

The receipt of certain gifts or other items of value, including entertainment, lodging, transportation and other accommodations, in connection with LifeStore's business may not be accepted unless permitted by applicable law and LifeStore's policies and guidelines. Specifically, the law and LifeStore's policies provide that you may not: solicit for yourself or for a third party anything of value from anyone in return for any business, service or confidential information of LifeStore; or accept anything of value (other than your salary or other compensation paid by LifeStore) from anyone in connection with LifeStore's business, either before or after a transaction is discussed or completed. Similar restrictions and policies may apply to the giving of gifts or other items of value by employees and officers to third parties dealing with LifeStore, including government officials. For example, we must comply with laws that restrict the acceptance of gifts, meals, entertainment and other items of value by employees of federal, state and local government departments and agencies that do business with or regulate LifeStore. The law and LifeStore's policies and guidelines recognize that some gifts, items of value and other forms of ordinary courtesies of reasonable value that are received or are provided in connection with business meetings or activities generally do not pose a conflict of interest and are permissible.

Records and Reporting of Information

LifeStore requires honest and accurate recording and reporting of information to meet financial reporting, regulatory, tax and legal obligations. All business transactions, including employee expense reporting, must be properly and accurately recorded in a timely manner on LifeStore's books and records in accordance with applicable accounting standards, legal requirements and LifeStore's system of internal controls.

LifeStore is committed to full, fair, accurate, timely, and understandable disclosure in public reports and documents filed with, or submitted or provided to, regulatory authorities, shareholders and the public. LifeStore's financial statements and reports must be prepared in accordance with generally accepted accounting principles and fairly represent, in all material respects, the financial condition and results of operations of LifeStore. Employees, officers and directors who prepare or supervise the preparation of LifeStore's public reports must be careful to ensure that those reports meet the requirements of the Code. No employee, officer or director should ask or encourage another person to deviate from LifeStore's commitment to provide truthful and accurate financial or other information. In addition, the law and LifeStore's policies require that no employee, officer or director attempt to improperly influence, coerce, manipulate

or mislead any accountant engaged in the preparation of LifeStore's financial statements. If you have any questions, complaints or concerns regarding accounting, auditing, or internal accounting control matters, you should contact the Internal Audit Department or you may follow the procedures described under "Compliance Responsibilities," which include a confidential reporting process.

Corporate Opportunities

Employees, officers and directors owe a duty to LifeStore to advance LifeStore's legitimate interests when the opportunity arises. Employees, officers and directors are prohibited from benefiting personally from opportunities discovered through the use of corporate property, information or their position with LifeStore, or from competing with LifeStore in connection with such opportunities. No employee, officer or director may use corporate property, information, or his or her employment position for improper personal gain.

Sale or Purchase of Company Assets

Directors, employees and immediate family members may not purchase repossessed or foreclosed property. Purchases of other company assets, such as used equipment and furniture can be made, when they have no further value to LifeStore, and with the approval of the Chief Financial Officer. Such purchases should be made available to all employees and not be made with the intent to resell or for use by another competing organization.

Personal Finances and Transactions with the Company

All employees, officers and directors are expected to conduct their personal affairs in a manner wherein there will be no opportunity for unfavorable reflection upon LifeStore, either expressed or implied. While LifeStore has the utmost respect for the individual's privacy and other personal rights, LifeStore also realizes that the improper handling of personal finances could undermine the credibility of an employee, officer or director and that an unstable financial position could be thought to influence actions or judgments of such persons in their official capacity. All employees, officers and directors are expected to maintain their personal finances in a responsible manner, including handling Company accounts properly and not writing checks against insufficient funds.

Safeguarding of Company Property

All employees and directors of LifeStore are responsible for safeguarding the property of the company. Damaging the company's or a customer's property or records or violating the confidentiality of such records is prohibited. Internal accounting controls, record keeping policies, computer usage policies, securities and investment policies, loan policies and underwriting standards and auditing policies have been established and disseminated by LifeStore to meet its business needs as well as the requirements of applicable laws and regulations. It is the responsibility of each employee, officer and director to adhere to these policies and procedures.

Anyone who embezzles, steals or willfully misappropriates anything from the company will be subject to disciplinary action and may be subject to fines and/or imprisonment.

Confidential Information

LifeStore protects the private, personal and proprietary information of customers, vendors and employees. Any information from or relating to a customer or vendor must be protected, and

may only be disclosed within LifeStore or to non-affiliated parties in accordance with applicable law and LifeStore's confidentiality and privacy policies. Employees, officers and directors receiving confidential information relating to LifeStore in the course of their duties at LifeStore are obligated to protect that information from disclosure. Employees should only disclose confidential information to other employees who have a business-related "need to know." In addition, employees and officers should be aware that certain divisions have policies that restrict the flow of confidential information between their division and other LifeStore divisions.

Confidential information may include, without limitation, the following:

- Information about existing or potential customers or vendors, including customer identities, lists and all other customer information.
- Business or technical information, including information such as a formula, program, method, technique or compilation of information that is valuable because it is not generally known.
- Intellectual property and information regarding past, present or future products.
- Financial information, including budgets or projections, business plans, price lists and any other financial, marketing or sales information.
- Information intended solely for internal use such as internal memos to employees and internal broadcasts.
- Information regarding LifeStore employees, including salary and personal information.
- Information about potential acquisitions or divestitures.
- Any other non-public information that would be harmful to LifeStore or useful or helpful to competitors if disclosed.

Use or disclosure of any confidential information can result in civil or criminal penalties, for the employee, officer and the company. Every employee or officer should continue to keep this information confidential after their employment with LifeStore ends.

Insider Trading

In performing their responsibilities to LifeStore, employees, officers and directors may receive confidential information about LifeStore, its customers, vendors and others. Federal securities laws prohibit the purchase or sale of stock of a company while aware of material nonpublic information (generally referred to as "inside information") concerning that company. If an employee, officer or director buys or sells stock based on "inside information" or discloses inside information to another person who buys or sells stock based on that information, the disclosing employee, officer or director, LifeStore, and the person to whom the information was disclosed may have violated securities laws. Employees, officers and directors are prohibited from trading on inside information and communicating or "tipping" inside information to others.

Political Activities

LifeStore believes that it is important for citizens to take an active interest in the political process, and LifeStore employees, officers and directors may engage in political activities of their own choice, using their own resources, and on their own time. In such cases, employees, officers and directors participating in political activities do so solely in their personal individual capacity and not as representatives of LifeStore, and such activities must not use LifeStore's

facilities or assets or interfere with such person's responsibilities to LifeStore. Employees are not to openly campaign, either verbally or in writing (i.e. posters, placards or handouts) for any political candidate on company premises. Any employee or officer desiring to run for elective political office or to accept an appointment to federal, state or local government office should discuss the matter in advance with the CEO who in turn may review with the Conflict of Interest Committee.

Federal and state laws and regulations govern political activities, including the operation of political action committees ("PACs").

Media Communication

Non-public information or materials regarding LifeStore, including employee communications, must not be distributed outside of LifeStore, including to the media, unless specifically authorized. From time to time employees, officers and directors may receive inquiries from the media regarding LifeStore or its business or from someone interested in LifeStore's securities. Any inquiry from the media, including those relating to pending litigation or regulatory matters, should be promptly referred to the Chief Executive Officer or Chief Banking Officer.

Code Administration and Enforcement

Any employee or director may submit a good faith complaint regarding any violation of this code to the Internal Auditor or Chief Executive Officer of LifeStore without fear of dismissal or retaliation of any kind. LifeStore is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The Audit Committee will oversee treatment of employee or director concerns in this area. The Audit Committee has the authority to involve the Governance Committee of the Board of Directors and/or outside legal or regulatory assistance in resolving complaints of Code violations involving executive officers or members of the board of directors.

In order to facilitate the reporting of director and employee complaints, LifeStore's Whistleblower Policy has been created. Please refer to the Whistleblower Policy in this Employee Handbook for further information on how complaints may be submitted.

Waivers of the Code

In certain circumstances, it may be appropriate to grant a waiver of a provision of the Code. Any request for a waiver must be in writing and presented to the Chief Executive Officer or Director of Human Resources. Any waiver of this Code for LifeStore's executive officers, including our Chief Executive Officer, Chief Financial Officer, Chief Banking Officer and Chief Credit Officer, or Directors may be made only by the Board of Directors or a designated committee of the Board, and must be promptly disclosed to shareholders in accordance with legal and regulatory requirements.

Compliance Responsibilities

In keeping with the values of LifeStore, all employees, officers and directors must be committed to the highest level of personal performance, including meeting the requirements of the Code. All employees, officers and directors should ensure prompt and consistent reporting of violations of the Code, as well as any actual or potential violation of applicable laws, regulations or LifeStore's policies. Because it may be unclear whether a violation has occurred, employees and

officers are encouraged to talk to managers about behavior that may violate the Code and may raise any questions relating to the Code.

If you are uncomfortable discussing a particular situation with a manager, you should feel free to report any concerns that you have about existing or potential violation of law, rules, regulations or this Code, or any other matter, to the Chief Executive Officer, Chief Executive Officer, Chief Banking Officer, Chief Credit Officer and/or the Director of Human Resources. Any matters relating to executive officers, senior financial officers or directors may also be reported to the Board of Directors or Board Audit Committee, or Internal Audit.

If a situation requires that your identity remain secret, anonymity will be protected, subject to applicable law, regulation or legal proceedings. In addition, if you are uncomfortable with any of the options described above, reports of violations, complaints or other matters, including those regarding accounting, auditing, or internal accounting control matters, may be made through LifeStore's confidential Whistleblower. If desired, you do not need to disclose your identity. All inquiries will be forwarded to the appropriate party for investigation, including the Audit Committee of the Board of Directors, if appropriate, so that LifeStore can respond to the inquiry.

LifeStore does not permit retaliation of any kind for good faith reports of ethical violations or misconduct of others. This means that LifeStore will not terminate, demote or otherwise discriminate against any person for calling attention to suspected illegal or unethical acts of others. "Good faith reports" do not require that you be right about a reported activity, but do require that you tell the truth as you know and believe it.

LifeStore's values require that each of us undertake our roles and responsibilities seriously. Nothing can be more serious and important than ensuring that each of us lives up to the standards of the Code. The reputation of LifeStore is its most valuable asset. Therefore, to reinforce our commitment to the Code, you will be asked from time to time to complete an acknowledgement regarding your understanding of and compliance with the principles of the Code and related guidelines.

Those who violate the Code, or who fail to cooperate fully with any inquiries or investigations, will be subject to corrective action, possibly including termination of employment or criminal prosecution.