

Seacoast Banking Corporation of Florida

Regulation FD Disclosure Policy

Policy Statement

Seacoast Banking Corporation of Florida, its subsidiaries and affiliates (collectively, “Seacoast” or the “Company”) is committed to providing fair, timely, accurate and understandable public disclosure of financial information about Seacoast on a non-selective basis and in compliance with the Securities and Exchange Commission’s (“SEC”) Regulation Fair Disclosure (“Regulation FD”) and other laws and regulations.

This Policy (i) prohibits the selective disclosure of material nonpublic information about the Company in violation of Regulation FD, (ii) sets forth procedures that will prevent such improper selective disclosure, and (iii) provides for the broad public distribution of material information regarding Seacoast to all members of the investing public at the same time.

Philosophy

We believe it is in the Company’s best interests to maintain an active and open dialogue with shareholders and potential investors regarding Seacoast’s historical performance and future prospects. We can best create shareholder value by publicly discussing our strategies, business strengths, and growth opportunities through an active dialogue. We are committed to providing current and potential shareholders access to key information reasonably required to make an informed decision on whether to invest in Seacoast stock.

Compliance

It is Seacoast’s policy to comply with all periodic reporting and disclosure requirements, including Regulation FD. Our practice has been, and will continue to be, to disclose material information about Seacoast in a public, timely and non-selective manner.

No director, officer or employee of the Company, unless expressly authorized, may disclose any non-public, “material” information about the Company to any person other than: (i) to another Company director, officer or employee who needs to know the information for operational reasons; (ii) any person who owes a duty of trust or confidence to the Company through professional responsibility or by contract (*e.g.*, an attorney, accountant or investment banker); or (iii) any person who has entered into an express confidentiality agreement with the Company.

Definitions

The following defined terms apply to this Policy:

Authorized Spokesperson: An “Authorized Spokesperson” is an individual authorized by the Company to communicate with Regulation FD Persons with respect to Company matters.

Material information: “Material information” is information which could affect the market price of the Company's securities and if there is a substantial likelihood that a reasonable investor would attach importance in deciding whether to buy, sell, or retain the security. This includes a range of subjects, either positive or adverse, including but not limited to:

- the Company’s current or expected operating performance;
- earnings information;
- mergers, acquisitions, tender offers, joint ventures or other strategic transactions;
- a significant sale of assets or the disposition of a subsidiary;
- events regarding the Company’s securities (*e.g.*, defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits or changes in dividend policies or rates or public or private sales of additional securities);
- changes in auditors or auditor notification that the Company may no longer rely on an audit report;
- changes in control of the Company or changes in management;
- bank regulatory matters;
- significant new products or discoveries; and
- the gain or loss of a substantial customer or supplier.

Nonpublic: Information is nonpublic if it has not been disseminated in a manner designed to make it available to the public at large (*e.g.*, it has not been disclosed in an SEC filing, press release, webcast earnings call).

Regulation FD Persons: “Regulation FD Persons” include:

- broker/dealers, analysts, investment advisors, securities market professionals, institutional investment managers, investment companies and persons associated or affiliated with them;
- holders of the Company’s securities who may reasonably be expected to trade the Company’s securities based on the communication; and
- representatives of the media.

Authorized Communications

Only the Chairman and Chief Executive Officer or Executive Vice President and Chief Financial Officer of the Company (individually an “Authorized Spokesperson”) may communicate with Regulation FD Persons with respect to Company matters.

Other officers or employees of Seacoast may communicate with Regulation FD Persons only at the specific direction of an Authorized Spokesperson. The Corporate Secretary may communicate with shareholders and beneficial owners in response to inquiries regarding shareholder accounts and other administrative matters.

Unless otherwise specifically directed by an Authorized Spokesperson, employees must refer all questions from Regulation FD Persons regarding company business information to an Authorized Spokesperson. If an employee is in doubt as to whether someone is covered by this Policy as a Regulation FD Person, then such employee should either (i) assume that such person is a Regulation FD Person or (ii) contact [an Authorized Spokesperson] for guidance. In any event, no officer, director or employee is authorized to communicate material nonpublic

information about the Company. [Employees are not permitted to discuss the Company in chat rooms, blogs, electronic bulletin boards or other similar media.]

If any officer, director or employee makes an unauthorized disclosure of material nonpublic information, he or she should immediately contact an Authorized Spokesperson or the Corporate Secretary. Certain inadvertent disclosures can be cured by appropriate action within 24 hours of the event.

Public Disclosure of Material Information

We endeavor to disclose material information in a way that ensures full public disclosure in accordance with Regulation FD. Information is considered to be available to the public only when it has been released to the public through appropriate channels and enough time has elapsed to permit the investment market to absorb and evaluate the information.

The methods used to ensure full public disclosure may include (i) issuing a press release through a widely disseminated news or wire service, (ii) filing or furnishing the SEC with a Form 8-K or including the information in another document filed with the SEC (e.g., a quarterly report on Form 10-Q or annual report on Form 10-K), or (iii) hosting a webcast or conference call that is available to the public after public notice of the broadcast. Seacoast may utilize any combination of the above methods or other methods designed to ensure full public disclosure.

Earnings Announcements and Conference Calls

Following the end of each quarter, Seacoast issues a press release to report its results of operations for that quarter and to provide quarter and period comparisons. Prior to its issuance, the earnings announcement is reviewed by the Company's Audit Committee and shared with the NASDAQ Stock Exchange (the "NASDAQ"). The press release is issued on a news wire service and is posted to our website, www.seacoastbanking.net.

In addition to the historical financial information provided, Seacoast may include estimates, projections or commentary on future earnings, performance or operational results as part of its quarterly earnings announcement or conference call. This information will be accompanied by a forward-looking information cautionary statement which discloses that the projections or statements on future results are based on current expectations and that actual results may differ materially, as well as, where applicable, a discussion of risk factors that could cause the results to be materially different or a reference to such disclosure in a recently filed SEC report. The Company has no obligation to update the guidance.

Seacoast also generally holds quarterly investor conference calls and webcasts as a means to disseminate quarterly operational results. The call is open to the Regulation FD Persons and the public at large. The earnings press release is generally issued either on the morning of the day of the conference call before trading begins or after trading closes on the preceding day. Each call usually begins with prepared remarks by Authorized Spokesperson(s), including a cautionary statement on forward-looking information and reference to the risk factor disclosure, followed by a question and answer period. Although the Company permits anyone who may be interested to listen to the conference call, the Company may choose to permit only securities analysts or other designated individuals to ask questions, as long as all listeners can hear the questions and

answers. Authorized Spokespersons and other executive management may respond to questions during the conference call with information which is factual, historical and already publicly disclosed. Seacoast expects to provide advance public notice about each call through a press release and information posted on our website, www.seacoastbanking.net. The notice will include the date, time, telephone number and/or webcast internet address for the conference call and the period, if any, for which a replay of the webcast will be available. Slides may also be used in the conference call and, if used, are also posted to the Company's website. A playback of the conference call is generally available on the Company's website for a limited time.

Following each quarterly earnings release and conference call, Seacoast will file a Form 8-K with the SEC which includes as exhibits: the press release of our quarterly earnings, a transcript of the public conference call and any slides that may have been used during the call.

Any of these practices may be discontinued by the Company at any time in its sole discretion.

Financial Projections and Other Forward-Looking Statements

We do not generally provide formal or informal earnings guidance regarding future operating results except as part of the Company's regular quarterly earnings announcements or conference calls. We believe that this Policy helps to focus the attention of management and investors on Seacoast's long-term performance and value creation. However, we may occasionally decide, on a case-by-case basis and at the Company's sole discretion, to provide information regarding the Company's expected financial performance before issuance of our quarterly earnings release. To the extent that the Company provides guidance relative to its financial goals, any such guidance, and changes to or affirmations of the guidance, will be done through methods designed to ensure broad disclosure and shall contain a cautionary statement on forward-looking information, as described above

Analyst Models and Reports

We do not comment on, or adopt, analyst reports or earnings models. An Authorized Spokesperson, however, in his discretion, may comment upon inaccuracies relating to publicly disclosed factual information or to correct any mathematical errors. The Company will not reproduce or distribute copies of any analyst reports other than for internal purposes.

Investor Relations Questions

An Authorized Spokesperson may take phone calls from Regulation FD Persons with questions. We may respond to questions that relate to information which is solely factual, historical and already public. If questions are of interest to a wider audience, we may, at our sole discretion, post our response on the Investor Relations section of our website, www.seacoastbanking.net.

Quiet Period

In order to avoid the potential for selective disclosure or even the perception or appearance of selective disclosure, we will observe a "quiet period" each quarter prior to the distribution of the earnings release for the prior quarter (and for the full year during the fourth quarter) during which we will not initiate any one-on-one meetings or telephone contacts with analysts and

investors and no discussion regarding earnings or quarterly results of operations will take place, except to respond to unsolicited inquiries of a factual nature. We may participate in securities firm-sponsored conferences and other investor presentations during the quiet period, but no discussions of earnings or quarterly results will take place. The quiet periods shall begin at 5:00 pm on the 15th day of the third month of each quarter (i.e., March, June, September and December). If such day is not a business day, the commencement date shall be the immediately preceding business day. The quiet period shall end at the later of the issuance of the earnings press release or conference call for each quarter. This quiet period does not preclude responding to inquiries concerning publicly available or non-material information.

Presentations

We participate in securities firm-sponsored conferences and other investor presentations from time to time. We do not intend to disclose any material nonpublic information during these conferences. When practical, we seek to issue press releases regarding the conferences and post these presentations on our website, www.seacoastbanking.net. If any inadvertent disclosure of material nonpublic information occurs at these conferences, appropriate public disclosure will be made promptly as described below.

One-on-One Meetings and Conversations

Authorized Spokespersons are permitted to meet with individual investors, groups of investors, analysts and other Regulation FD Persons. When possible, we will seek to have more than one Authorized Spokesperson present at any one-on-one meeting. We do not intend to disclose any material nonpublic information during these meetings. If an Authorized Spokesperson determines that material nonpublic information will be or has been disclosed, appropriate public disclosure will be made: (i) prior to or simultaneously if the disclosure is intentional, or (ii) promptly as described below if the disclosure is unintentional.

Media Communications

Although Regulation FD does not apply to communications with the media, it is our policy not to disclose material nonpublic information to individual representatives of the media unless it has been previously disclosed in a press release or otherwise broadly disseminated in accordance with Regulation FD.

Responding to Market or Media Rumors

Whether or not a market or media rumor regarding Seacoast or unusual trading activity in the Company's stock has any basis in fact, our policy is to not respond to inquiries regarding rumors or speculation. We seek to follow this approach consistently in order to avoid providing an implied confirmation or denial in other circumstances. The Chairman and Chief Executive Officer or Executive Vice President and Chief Financial Officer of the Company should be informed of any rumor or unusual trading activity as soon as possible.

Inadvertent Disclosures

We recognize the possibility of inadvertent disclosure of material nonpublic information may occur. In such instances, we must promptly disseminate through a press release, the furnishing or filing of a Form 8-K, or both, any material nonpublic information inadvertently disclosed. After becoming aware of the inadvertent disclosure, we will endeavor to disseminate the material information before the later of: (i) 24 hours, or (ii) the next opening of trading on the NASDAQ.

Securities Offerings

Regulation FD contains limited exemptions for registered securities offerings made by companies subject to the regulation. These exemptions are beyond the scope of this Policy, but in general Regulation FD does not apply to communications made “in connection with” registered public offerings for issuer capital-raising purposes (e.g., to an underwriter in connection with a public offering).

Policy Administration

This Policy may be amended from time to time at the discretion and approval of the Company’s board of directors. Any questions regarding this Policy should be directed to the Corporate Secretary.

Violations of this Policy

Violations of Regulation FD are subject to SEC enforcement action which may include an administrative action seeking a cease-and-desist order, or a civil action against the Company or an individual, seeking an injunction and/or civil monetary penalties.

Any violation of this Policy by a director, officer or employee shall be brought to the immediate attention of the Chairman and Chief Executive Officer or Executive Vice President and Chief Financial Officer of the Company, and may constitute grounds for termination of service or employment with Seacoast.