

CODE OF CONDUCT

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CODE OF CONDUCT

INTRODUCTION

At Seacoast Bank, we strive to provide quality products and services within the confines of ethical business practices. The strength of our company lies in maintaining mutual respect between the company and our various stakeholders, and in preserving our reputation for integrity. Our customers, shareholders, and communities expect us to meet world-class standards. They entrust us with their money, confidential information, and the most 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 associates 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. Associates who become aware of any behavior by another associate 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 Risk Officer. The situations will be appropriately and confidentially investigated, to the extent possible. There will be no retaliation against associates who report information in good faith.

SOCIAL CONDUCT & BANK COMMITMENTS

As bankers, associates are required to conduct themselves in a manner that will not damage the reputation of Seacoast Bank, or the associate, through the perceptions of our shareholders, coworkers, community and our families. At times, Seacoast Bank will sponsor events including after-hour meetings and associate 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. Associates 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.

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

EQUAL OPPORTUNITY EMPLOYER

Seacoast Bank has an established policy of equal opportunity with respect to race, color, religion, sex, age, national origin, nationality, creed, citizenship, alienage, marital or domestic partnership or civil union status, pregnancy, affectional or sexual orientation, mental or physical disability, veteran status, liability for military service, whistleblower status, gender identity and/or expression, atypical cellular or blood trait, genetic information or any other characteristic protected under federal, state or local law. Seacoast Bank is committed to following all applicable laws and regulations pertaining to equal opportunity and affirmative action in all aspects of the employer-associate relationship, conditions of employment and all areas of compensation.

CODE OF CONDUCT

EQUAL OPPORTUNITY EMPLOYER (CONTINUED)

It is the constant purpose and intent of Seacoast Bank to comply fully with the various civil rights acts and executive orders implementing such legislation, together with all state and local legislation and ordinances pertaining to equal employment. Please refer to Seacoast Bank's EEO Policy Statement posted in all work locations and available on our company intranet.

ANTI-HARASSMENT POLICY & COMPLAINT PROCEDURE

Seacoast Bank is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Seacoast Bank expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

It is the policy of Seacoast Bank to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, age, national origin, nationality, creed, citizenship, alienage, marital or domestic partnership or civil union status, pregnancy, affectional or sexual orientation, mental or physical disability, veteran status, liability for military service, whistleblower status, gender identity and/or expression, atypical cellular or blood trait, genetic information or any other characteristic protected under federal, state or local law. Seacoast Bank prohibits any such discrimination or harassment.

Seacoast Bank encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Seacoast Bank to promptly and thoroughly investigate such reports. Seacoast Bank prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

DEFINITIONS OF HARASSMENT

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: **a)** submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; **b)** submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or **c)** such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color religion, sex, age, national origin, nationality, creed, citizenship, alienage, marital or domestic partnership or civil union status, pregnancy, affectional or sexual orientation, mental or physical disability, veteran status, liability for military service, whistleblower status, gender identity and/or expression, atypical cellular or blood trait, genetic information or any other characteristic protected under federal, state or local law or that of his/her relatives, friends or associates, and that **a)** has the purpose or effect of creating an intimidating, hostile or offensive work environment; **b)** has the purpose or effect of unreasonably interfering with an individual's work performance; or **c)** otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via email, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

CODE OF CONDUCT

ANTI-HARASSMENT POLICY & COMPLAINT PROCEDURE (CONTINUED)

INDIVIDUALS & CONDUCT COVERED

These policies apply to all applicants and associates, whether related to conduct engaged in by fellow associates or someone not directly connected to Seacoast Bank (e.g., an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

COMPLAINT PROCESS

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, Human Resources or any member of management.

When possible, Seacoast Bank encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Seacoast Bank recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Seacoast Bank encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed. Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately.

If a party to a complaint does not agree with its resolution, that party may appeal to Seacoast Bank's Chief HR Officer or Chief Risk Officer. False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action.

AMERICANS WITH DISABILITIES ACT (ADA) & ADA AMMENDMENTS ACT (ADAAA)

It is the policy of Seacoast Bank to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to Seacoast Bank. Contact the Human Resource department with any questions or requests for accommodation.

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WORKPLACE SAFETY

SAFETY

It is the responsibility of each associate to conduct all tasks in a safe and efficient manner complying with all local, state and federal safety and health regulations and program standards, and with any special safety concerns for use in a particular area or with a client.

Although most safety regulations are consistent throughout each department and program, each associate has the responsibility to identify and familiarize her/himself with the emergency plan for his/her working area. Each facility shall have posted an emergency plan detailing procedures in handling emergencies such as fire, weather-related events and medical crises.

It is the responsibility of the associate to document the incident in iSight, Seacoast's loss and incident reporting application, for each safety and health infraction that occurs by an associate or that the associate witnesses. Failure to report such an infraction may result in associate disciplinary action, including termination.

Furthermore, management requires that every person in the organization assumes the responsibility of individual and organizational safety. Failure to follow company safety and health guidelines or engaging in conduct that places the associate, client or company property at risk can lead to associate disciplinary action and/or termination.

If an accident occurs on bank premises, whether to a customer, visitor, or associate, the matter should be referred immediately to a supervisor, regardless of how insignificant the accident may appear to be. This procedure is necessary in order to provide immediate medical aid to an injured person, and to facilitate a full and prompt report to the insurance company. When the accident involves customers or visitors, no associate should make any statements to the injured person or others as to the cause of the accident. The Human Resources Department maintains records of all reported accidents involving associates.

Associates that are injured on the job are required to report all injuries to their supervisor immediately. Failure to report injuries may result in denial of Workers Compensation Benefits. Accidents involving customers or visitors should be reported to the department supervisor and Risk manager, both of whom are responsible for all record-keeping in these cases.

WORKPLACE BULLYING

Seacoast Bank defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment." Such behavior violates the company Code of Ethics, which clearly states that all associates will be treated with dignity and respect.

The purpose of this policy is to communicate to all associates, including supervisors, managers and executives, that the company will not tolerate bullying behavior. Associates found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important.

Seacoast Bank considers the following types of behavior examples of bullying:

- **Verbal bullying:** slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical bullying:** pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property.
- **Gesture bullying:** nonverbal threatening gestures or glances that convey threatening messages.
- **Exclusion:** socially or physically excluding or disregarding a person in work-related activities.

WORKPLACE SAFETY

VIOLENCE IN THE WORKPLACE

All associates, customers, vendors and business associates must be treated with courtesy and respect at all times. Associates are expected to refrain from conduct that may be dangerous to others.

Conduct which threatens intimidates or coerces another associate, customer, vendor or business associate will not be tolerated. Seacoast Bank resources may not be used to threaten, stalk or harass anyone at the workplace or outside the workplace. Seacoast Bank treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor, security personnel, Human Resources, member of Seacoast Bank's Risk Management Team or any member of senior management. When reporting a threat or incident of violence, the associate should be as specific and detailed as possible. Associates should not place themselves in peril, nor should they attempt to intercede during an incident.

Associates should promptly inform the Human Resource department of any protective or restraining order that they have obtained that lists the workplace as a protected area. Associates are encouraged to report safety concerns with regard to intimate partner violence. Seacoast Bank will not retaliate against associates making good-faith reports. Seacoast Bank is committed to supporting victims of intimate partner violence by providing referrals to Seacoast Bank's associate assistance program (EAP) and community resources and providing time off for reasons related to intimate partner violence.

Seacoast Bank will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. Seacoast Bank will not retaliate against associates making good-faith reports of violence, threats or suspicious individuals or activities. In order to maintain workplace safety and the integrity of its investigation, Seacoast Bank may suspend associates suspected of workplace violence or threats of violence, either with or without pay, pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Seacoast Bank encourages associates to bring their disputes to the attention of their supervisors or Human Resources before the situation escalates. Seacoast Bank will not discipline associates for raising such concerns.

SMOKE-FREE WORKPLACE

It is the policy of Seacoast Bank to prohibit smoking on all company premises in order to provide and maintain a safe and healthy work environment for all associates. Smoking is defined as the act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette, pipe, or any kind of vaping device.

The smoke-free workplace policy applies to:

- All areas of company buildings.
- All company-sponsored off-site conferences and meetings.
- All vehicles owned or leased by the company.
- All visitors (customers and vendors) to the company premises.
- All contractors and consultants and/or their associates working on the company premises.
- All associates, temporary associates and student interns.

Smoking is permitted in parking lots only. Associates who violate the smoking policy will be subject to disciplinary action up to and including immediate discharge.

WORKPLACE SAFETY

SECURITY

Due to the nature of bank business and compliance with the Bank Protection Act of 1968, the Bank has an established Security Program revised and approved annually by the Bank's Board of Directors. This program is under the direction of the Executive Officer of Operations & Technology, with management support.

Associates should familiarize themselves with the security precautions and procedures that follow.

PREMISES

Associates are permitted to enter the bank building only after the officer with security duty has cleared the building and given the all-clear signal. If the signal has not been given within a reasonable amount of time, the proper warning procedure should be followed by the associate. Associates arriving for work should enter the bank only through one entrance, except at the main campus.

The last person leaving any area or floor of a bank building at the end of the day should make a brief visual check of potential problem areas (i.e. trash cans, storage room) to determine there is no hidden danger of fire. All associates must leave by the front door, except at the main campus. Associates should be sure the outside door is locked behind them. After leaving the building, associates should be alert to any suspicious cars or persons near the bank.

During working hours, associates should be alert to the security of the bank. For example, observe persons entering the lobby. Should a suspicious-looking person come in, be especially observant to characteristics which could be used for identification. A supervisor should be alerted immediately to any situation which could be a confrontation at a teller window.

Visitors will not be allowed in the bank's work area unless on a conducted tour. Non-supervisory associates having personal business to transact with callers should see them either in the bank lobby or lunchroom. Supervisory personnel should limit personal business to their office or public areas. In all cases, personal business during working hours should be kept to a minimum.

If a member of the news media approaches an associate to attain any information regarding Seacoast Bank, the associate should make no statement or provide any information. The associate should refer all questions to the Chief Executive Officer or to another member of executive management.

FIRE PROTECTION

Fire extinguishers are located at various locations in bank offices. Associates should make themselves aware of the locations of the fire extinguishers so they can quickly locate them in an emergency. Before the need arises to use fire extinguishers, associates should make themselves familiar with the instructions for operating them.

BOMB THREATS

A telephone or verbal threat of explosives placed in bank offices (and/or suspicious packages) should be reported immediately to a supervisor or officer. In the event of a bomb alert, all associates will be given instructions by their supervisors.

ROBBERY

Banks are subject to robberies. Should this rare event occur, associates should remember that panic is the most dangerous reaction, as it can worsen the situation. Obey the orders of the robber and do not attempt to prevent the robbery or to apprehend the robber. Remain calm and try to remember details of the appearance of the robber and any other information which will be helpful to the police.

Information about the robbery should be given only to authorized bank personnel and police or other law enforcement personnel. No information should be given to the news media, since such information should be provided only by an official spokesperson of the Bank. Employees are strictly prohibited from possessing firearms on Seacoast Banks premises, except when in compliance with Section 790.251, Florida Statutes.

For more details on the Security Program, refer to the Security Procedures Manual and your supervisor.

WORKPLACE SAFETY

DRUG-FREE WORKPLACE

Seacoast Bank has a longstanding commitment to provide a safe and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of associates and to the security of our equipment and facilities. For these reasons Seacoast Bank is committed to the elimination of drug and/or alcohol use and abuse in the workplace.

This policy outlines the practice and procedure designed to correct instances of identified alcohol and/or drug use in the workplace. This policy applies to all associates and all applicants for employment of Seacoast Bank. The Human Resource department is responsible for policy administration.

ASSOCIATE ASSISTANCE & DRUG-FREE AWARENESS

Illegal drug use and alcohol misuse have a number of adverse health and safety consequences. Information about those consequences and sources of help for drug/alcohol problems is available from the Human Resource department, whose members have been trained to make referrals and assist associates with drug/alcohol problems.

Seacoast Bank will assist and support associates who voluntarily seek help for such problems before becoming subject to discipline and/or termination under this or other policies. Such associates may be allowed to use accrued paid time off, placed on leaves of absence, referred to treatment providers and otherwise accommodated as required by law. Such associates may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if they hold jobs that are safety sensitive or that require driving or if they have violated this policy previously.

Associates should report to work fit for duty and free of any adverse effects of illegal drugs or alcohol. This policy does not prohibit associates from the lawful use and possession of prescribed medications. Associates must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor. Associates should not, however, disclose underlying medical conditions unless directed to do so.

WORK RULES

The following work rules apply to all associates:

- Whenever associates are working, are operating any company vehicle, are present on company premises, or are conducting related work off-site, they are prohibited from:
 1. Using, possessing, buying, selling, manufacturing or dispensing an illegal drug (to include possession of drug paraphernalia).
 2. Being under the influence of alcohol or an illegal drug as defined in this policy.
- The presence of any detectable amount of any illegal drug or illegal controlled substance in an associate's body while performing company business or while in a company facility is prohibited.
- Seacoast Bank will not allow any associate to perform their duties while taking prescribed drugs that are adversely affecting the associate's ability to safely and effectively perform their job duties. Associates taking a prescribed medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce it if asked.
- Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

WORKPLACE SAFETY

DRUG-FREE WORKPLACE (CONTINUED)

REQUIRED TESTING

The company retains the right to require the following tests:

- **Pre-employment:** All applicants must pass a drug test before beginning work or receiving an offer of employment. Refusal to submit to testing will result in disqualification of further employment consideration.
- **Reasonable suspicion:** Associates are subject to testing based on observations by a supervisor of apparent workplace use, possession or impairment. Human Resources must be consulted before sending an associate for reasonable suspicion testing.
- **Post-accident:** Associates are subject to testing when they cause or contribute to accidents that seriously damage a company vehicle, machinery, equipment or property and/or result in an injury to themselves or another associate requiring off-site medical attention. Additionally, testing is required for all workers compensation claims. In any of these instances, the investigation and subsequent testing must take place within twenty-four (24) hours following the accident, if not sooner.
- **Follow-up:** Associates who have tested positive, or otherwise violated this policy, are subject to discipline up to and including discharge. Depending on the circumstances and the associate's work history/record, Seacoast Bank may offer an associate who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies for a minimum of one (1) year but not more than two (2) years. If the associate either does not complete his/her rehabilitation program or tests positive after completing the rehabilitation program, he/she will be subject to immediate discharge from employment.

CONSEQUENCES

Applicants who refuse to cooperate in a drug test or who test positive will not be hired. Associates who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated. The first time an associate tests positive for alcohol or illegal drug use under this policy, the result will be discipline up to and including discharge.

Associates will be paid for time spent in alcohol/drug testing and then suspended pending the results of the drug/alcohol test. After the results of the test are received, a date/time will be scheduled to discuss the results of the test. This meeting will include a member of management and Human Resources. Should the results prove to be negative the associate will receive back pay for the times/days of suspension.

CONFIDENTIALITY

Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to the medical review officer (MRO) shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files.

INSPECTIONS

Seacoast Bank reserves the right to inspect all portions of its premises for drugs, alcohol or other contraband. All associates, contract associates and visitors may be asked to cooperate in inspections of their persons, work areas and property that might conceal a drug, alcohol or other contraband. Associates who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline up to and including discharge.

CONFIDENTIALITY

Seacoast Bank prohibits all associates from manufacturing, distributing, dispensing, possessing or using an illegal drug in or on company premises or while conducting company business. Associates are also prohibited from misusing legally prescribed or over-the-counter (OTC) drugs. Law enforcement personnel shall be notified, as appropriate, when criminal activity is suspected.

WORKPLACE SAFETY

INFORMATION SECURITY & TECHNOLOGY PROGRAM POLICY

Seacoast Bank has implemented a Privacy Program that protects customer non-public or sensitive information for our compliance with Gramm- Leach-Bliley (GLBA) Privacy Act, and has appointed the Information Security Officer as the responsible person for this program who creates, an annual Privacy Risk assessment and reports GLBA compliance efforts to the Board of Directors, annually. Associates are required to take annual training for GLBA Privacy and HR will notify you by email when the training will be conducted.

Sensitive customer information is defined in Seacoast Policy as:

A customer's name, address, or telephone number, in conjunction with the customer's social security number, driver's license number, account number, credit or debit card number, or a personal identification number or password that would permit access to the customer's account. In addition, this could include any combination of components of customer information that would allow someone to log onto or access the customer's account, such as user name and password or password and account number.

As an associate of Seacoast, you will treat sensitive customer information as follows:

- Communication of sensitive customer information to other Seacoast associates or authorized Seacoast service providers is done only when there is a business need.
- You will not use email to communicate sensitive customer information or put account numbers or Social Security numbers in the text of an email. You may communicate this information in an email attachment to a @SeacoastBank email address or to an authorized service provider at their email address, with your managers approval, but you must encrypt the attachment to the service provider prior to sending the email.
- You agree to file and store all sensitive customer information in secure areas created for this purpose, and shred any hard copy that does not need to be retained.
- You will participate in annual Privacy training, and read and agree to abide by our Information Security Program Policy.
- You will commit your User ID and password to memory, not write it down or share it with anyone.

The purchase of all computer equipment and software must be authorized by Seacoast management and obtained, installed, configured and maintained by the Information Systems Department (ISD).

Computers, whether PCs, Laptops, iPads or terminals attached to the network are only for Bank operations with the exception that the Bank permits a reasonable amount of personal use of email. Remote access to the Seacoast network is limited to email access, unless otherwise authorized by management. Modems or other non-standard communication devices are prohibited on any Seacoast Bank workstation connected to the internal network or for use by end users.

Downloads, or any inappropriate content from the Internet are prohibited unless specifically approved by ISD. All Internet and network activity is monitored. Avoid the following email categories, including but not limited to:

- Jokes, no matter how harmless they may seem.
- Opening or forwarding any form of a "chain" letter.
- Sexually suggestive material, particularly explicit and pornographic material that violates applicable law.
- Material that expresses or promotes discriminatory attitudes towards religion, gender, age, nationality or other groups.
- Software used for "hacking or cracking" internal or external computer systems, such as viruses, executable programs, software, screensavers, games, etc.
- Harassment or threats.
- Business activities unrelated to Seacoast Bank.
- Messages that intentionally misrepresent the identity of the sender.
- Material that is illegal in any other way.

WORKPLACE SAFETY

INFORMATION SECURITY & TECHNOLOGY PROGRAM POLICY (CONTINUED)

Abuse of email, Internet and network privileges can result in disciplinary action up to and including termination. Unauthorized access to another associate's files or use of company facilities to gain unauthorized access to another company's computing facilities is prohibited and is grounds for disciplinary action up to and including termination.

All data maintained on PCs, Laptops, iPads, Terminals, etc. remains the property of the Bank and must be held in strict confidence. Each person using these devices is responsible for the confidentiality of the data and the data is to be protected from all unauthorized persons both on and off the Bank premises. **Users MUST NOT leave an area with any sensitive customer data displayed on a PC monitor or data terminal screen, nor print hard copy or store data on a USB drive unless authorized by Bank management.** Privacy of information must be protected at all times.

It is incumbent upon each user to protect their individual passwords and keep them as secure as possible. Each user should comply with the below password policies:

- Use a unique User ID and password.
- Change passwords every 90 days.
- Make password length a minimum of eight characters.
- Use numbers and letters in passwords, with at least one capital letter.
- Report any possible password breaches, and reset your password.
- Logout or lock terminals that are left unattended.

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POLICIES & ASSOCIATE RESPONSIBILITIES

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 associate 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 associate representing Seacoast shall not provide any gift of more than nominal value to any individual or company in consideration for doing business with Seacoast 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 Seacoast 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 Seacoast. 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 Seacoast 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 Seacoast customers or suppliers except to the extent they are available to all associates 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 Seacoast is offered or receives something of value beyond what is permitted by the preceding, the gift or favor shall be reported to the Chief Risk Officer 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 Risk Officer 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 associate.

FIDUCIARY APPOINTMENTS

Fiduciary appointments (such as executor, administrator, guardian, trustee, testamentary trustee, etc.) may only be accepted for family members. An exception 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 as 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 associates 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.

POLICIES & ASSOCIATE RESPONSIBILITIES

RELATIONSHIP WITH CUSTOMERS

Confidential information with respect to customers obtained through employment with Seacoast 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 Seacoast, including family or associates, or even to other associates of Seacoast 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, Seacoast 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.

BUSINESS & 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 Seacoast 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 Seacoast (see Related Party Transaction Policy).

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

PERSONAL LOANS

Associates shall not borrow from any customer of Seacoast (except for normal credit purchases) unless the customer is a Seacoast 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

View the Disclosure "Purchase and Sale of Seacoast Stock or Other Securities" policy on the company intranet.

POLICIES & ASSOCIATE RESPONSIBILITIES

RESPONSIBILITY TO ASSOCIATES & OFFICERS

Seacoast 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 an Executive Officer.

RESPONSIBILITY OF ASSOCIATES, OFFICERS & DIRECTORS

PERSONAL FINANCES

Associates are expected to maintain their personal financial affairs in a manner which will favorably reflect on the reputation of Seacoast. 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 Chief HR Officer for review. Any exceptions to this policy, where circumstances are out of the associates control and any risk can be mitigated, can be approved by the Executive 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 a Seacoast customer is a general partner also requires the prior approval of an Executive Officer.

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

PURCHASE OF SEACOAST 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 Seacoast or any trust account being administered by Seacoast, 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 Seacoast assets by the Executive Officer requires prior approval by the Chief Executive Officer and/or the Board of Directors.

FALSE OR MESLEADING 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.

ACCOUNTING, RECORD KEEPING & INVESTIGATION

Seacoast 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.

POLICIES & ASSOCIATE RESPONSIBILITIES

RESPONSIBILITY OF ASSOCIATES, OFFICERS & DIRECTORS (CONTINUED)

ACCOUNTING, RECORD KEEPING & INVESTIGATION

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 Seacoast'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 miss-recorded funds, assets or liabilities or any prohibited act must promptly report the activity to the Chief Risk Officer.

USE OF SEACOAST NAME

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

INTERNAL DISCLOSURE OF SEACOAST ACTIVITIES

Each associate must ensure that the established procedures for reporting activities concerning the business of Seacoast are followed so that the Chief Executive Officer and/or the Chief Risk 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.

PURCHASE OF FAVORED TREATMENT/POLITICAL CANDIDATES

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 associates 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 associates if it is appropriate to the situation and would not compromise the company, the associate or the recipient.

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 Seacoast, 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 Seacoast'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 Risk 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.

POLICIES & ASSOCIATE RESPONSIBILITIES

RESPONSIBILITY OF ASSOCIATES, OFFICERS & DIRECTORS (CONTINUED)

COMMUNITY REINVESTMENT ACT

Corporate responsibility to its communities has been an integral part of Seacoast'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, Seacoast, and its associates, actively participates in a variety of socio-civic organizations that give back to the community. Seacoast'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. Seacoast is committed to weighing environmental considerations in its business decisions and striving to integrate the environmental and economic concerns of its constituents. Seacoast 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 Seacoast, 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.

REPORTING UNETHICAL PRACTICES & 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 associates, directors or agents commits a crime. Accordingly, any Seacoast associate who has knowledge or information about conduct by another associate, 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; Chief HR Officer; Compliance Risk 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. Associates may seek additional information on this subject by contacting the Chief HR Officer.

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 associates 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:

JOE FORLENZA

Chief Risk Officer
Seacoast Bank
815 Colorado Avenue
Stuart, FL 34994

CHRISTOPHER FOGAL

Chairman, Audit Committee
Seacoast Banking Corporation
c/o Proctor, Crook, Crowder & Fogal
2112 South US Highway 1, Suite 201
Fort Pierce, FL 34950

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

POLICIES & ASSOCIATE RESPONSIBILITIES

RELATIONSHIP WITH BANK REGULATORS (CONTINUED)

EMPLOYEE ETHICS LINE

Associates who do not feel comfortable discussing a business ethics issues with their supervisor or the Bank's Chief Risk Officer or Audit Committee Chairman may call the Employee Ethics Line, 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 if you observe behavior that has a negative effect on our company or your fellow employees but prefer not to give your name.

SEACOAST BANK'S ETHICS LINE

1-844-358-2109

www.securityvoice.com/reports

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

Common examples of areas of concern where associates should report the incident to their supervisor include:

- Accounting and auditing irregularities.
- Regulatory or control concerns.
- Theft and fraud.
- Conflicts of interest.
- Harassment or discrimination.
- Substance abuse.
- Securities matters.
- Insider trading.
- Destroying, altering, or falsifying company records.
- Disclosure of proprietary information.
- Other violations of policies and procedures.

Here's what happens when you call the **Employee Ethics Line**:

- 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.
- The Interviewer assigns a report number to the associate and asks them make one call back.
- The information is then relayed to the Bank's management to investigate the concern. This information will first be received by the Chief Risk Officer.
- 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 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. 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 Bank's 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?

POLICIES & ASSOCIATE RESPONSIBILITIES

RELATIONSHIP WITH BANK REGULATORS (CONTINUED)

HOW CAN I HELP MAINTAIN HIGH STANDARDS OF BUSINESS CONDUCT?

If you answer “yes” to any of those questions, the action is very likely wrong and you should avoid it. If the answers are not clear, don’t take the 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, talking to your supervisor is the next step. Ignoring business conduct violations only allows for the problem to grow more costly and frustrating.

ASSOCIATE INVESTIGATIONS

Seacoast Bank will conduct prompt, thorough, and confidential investigations when reported regarding associates 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/or any matter that represent a significant violation of bank code of conduct and business ethics.

Associates 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 associate refusing to do so (or who take deliberate action to undermine the investigation, provide false information or breach confidentiality) will be subject to disciplinary action, including termination. Exceptions to breaches in confidentiality will be granted to associates who obtain legal counsel during the investigation (where information can be shared with the attorney when client/attorney confidentiality privileges exist).

CODE OF ETHICS

- 60 Code of Ethics for Financial Professionals
- 60 Associate Checking Account Overdraft Policy
- 61 Compensation Recoupment Policy

CODE OF ETHICS

CODE OF ETHICS FOR FINANCIAL PROFESSIONALS

This Code of Ethics for Financial Professionals applies to the principal executive officers of Seacoast Banking Corporation of Florida (the "Company") and its reporting subsidiaries and all professionals serving in a finance, accounting, treasury, and tax or investor relations role. In addition, the Company expects all of its associates to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by the Company's Code of Conduct and other policies and procedures adopted by the Company that govern the conduct of its associates. This Code of Ethics is intended to supplement the Company's Code of Conduct.

Associates in specific decision making and reporting positions are required to perform their jobs in accordance with the Code of Ethics, including:

- Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Avoid conflicts of interest and to disclose to the Board of Directors or Audit Committee of the Company any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- Take all reasonable measures to protect the confidentiality of non-public information about the Company or its subsidiaries and their customers obtained or created in connection with your activities, and to prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory process;
- Produce full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company or its subsidiaries files with, or submits to, the Securities and Exchange Commission and other regulators and in other public communications made by the Company or its subsidiaries;
- Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory organizations of which the Company or its subsidiaries is a member; and
- Promptly report any possible violation of this Code of Ethics to the Company's Audit Committee.

Associates are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead the Company or its subsidiaries' independent public auditors for the purpose of rendering the financial statements of the Company or its subsidiaries misleading. Associates understand that they will be held accountable for their adherence to this Code of Ethics. An associate's failure to observe the terms of this Code of Ethics may result in disciplinary action, up to and including termination of employment. Violations of this Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for the associate, their supervisors and/or the Company.

Any questions an associate may have regarding the best course of action in a particular situation, should promptly contact the Chairman of the Audit Committee. Associates may choose to remain anonymous in reporting any possible violation of this Code of Ethics.

ASSOCIATE CHECKING ACCOUNT OVERDRAFT POLICY

Associates are expected to handle their personal finances in a responsible manner. Particular care should be taken to ensure overdrafts do not occur. If there is an overdraft on an associate checking account, a service charge will be incurred. The only time a service charge may be reversed is in the case of bank error. Any associate found to be reversing a charge on an account they are an authorized signer on, will be subject to immediate termination, even for a first offense and regardless of any circumstances that the associate uses as their reasoning. Visit the company intranet for the complete policy guidelines.

CODE OF ETHICS

COMPENSATION RECOUPMENT POLICY

Approved by Board of Directors on March 19, 2013.

This policy sets forth the conditions under which Seacoast Banking Corporation of Florida will seek reimbursement with respect to equity and non-equity incentive compensation paid or awarded to current or former executive officers of the Bank. This policy shall apply to all Incentive Compensation paid or awarded on or after the adoption of this policy by Seacoast Banking Corporation of Florida's Board of Directors.

In the event that the Company is required to prepare an accounting restatement due to its material noncompliance with financial reporting requirements under the U.S. securities laws, the Bank shall, to the extent permitted by governing law, require reimbursement of compensation (in an amount described below) from each Covered Executive who, at any time after the effective date and during the three-year period preceding the date on which the Bank is required to prepare the accounting restatement, (i) received payment of Non-Equity Incentive Compensation or (ii) realized compensation from Equity Awards, in either case based on the erroneous financial data, regardless of whether the Covered Executive engaged in misconduct or otherwise caused or contributed to the requirement for the restatement.

See the full policy on the company intranet.