

Sun National Bank Code of Ethics and Conduct

January 1

2016

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Code of Ethics and Conduct

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Sun is committed to conducting business according to the highest ethical standards. One of our basic values is integrity. Sun has developed this Code of Ethics and Conduct policy to help its officers and employees understand its commitment and to achieve this goal. Accordingly, the goals of this policy are among other things, intended (i) to deter wrong doing and to promote honest and ethical conduct by all employees of Sun including, but not limited to, our principal executive officer, principal financial and accounting officers, controller and all other persons performing similar functions; (ii) to promote full, fair accurate and timely disclosure in documents and reports Sun files with the Securities and Exchange Commission and in other public communications; and (iii) to promote compliance with all applicable governmental laws, rules and regulations.

Non-Discrimination

Sun values diversity among its employees. Each day, our employees are not only expected to avoid discrimination in their relationships with each other and with customers and suppliers, but to encourage others to behave in the same manner. Employment opportunities, assignments and promotions will be offered on the basis of merit regardless of race, creed, religion, color, national origin, ancestry, age, sex, pregnancy, affectional or sexual orientation, gender identity or expression, marital status, Civil Unions, familial status, domestic partnership, atypical hereditary cellular or blood trait, disability (including AIDS and HIV infection) genetic information, liability for service in the United States armed forces or any other characteristic protected under applicable federal, state, or local law. In addition, Sun strives to assure freedom from harassment for all its employees.

Genetic Information Non-Discrimination Act of 2008 (“GINA”)

Effective January 10, 2011, GINA prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of employees or their family members. No representative of Sun shall make such inquiry of any employee and/or candidate for employment. If such information is made known, it will not be used in any manner as to be discriminatory. If at any time information protected under this law is requested from you, you can and should decline to respond.

“Genetic information,” as defined by GINA, includes an individual’s family medical history, the results of an individual’s or family member’s genetic tests, the fact that an individual or an individual’s family member sought or received genetic services, and genetic information of a

fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Anti-Discrimination/Harassment

The Bank is committed to maintaining a safe, harassment-free and discrimination-free work environment in which employees at all levels of the Company are able to devote their full attention and best efforts to their jobs. Harassment, discrimination, or like conduct, whether intentional or unintentional, has no place in our culture at Sun. Accordingly, the Company does not authorize and will not tolerate any form of harassment, discrimination, or other like conduct by any employee, whether supervisory or non-supervisory. This policy applies to conduct occurring in, but not limited to the Company's primary locations and any work-related setting outside of the office including business trips, business meetings, and/or business-related social events.

All employees will be required to complete Respectful Workplace training at the time of hire and again annually during their employment.

It is the Company's policy to prohibit harassment of an employee by another employee, management representative, or business invitee including, but not limited to, harassment on the basis of race, sex, color, creed, religion, national origin, nationality, ancestry, age, disability, marital status, familial status veteran status, uniform service member status, liability for service in the Armed Forces of the United States citizenship status, nationality alienage, affectional or sexual orientation/identity, domestic partnership status, civil union status, gender identity or expression, genetic information, or carrier status in accordance with all applicable laws, directives and regulations of federal, state and city entities or any other characteristic protected by law. While it is not easy to define precisely what harassment is, it certainly includes slurs, epithets, threats, derogatory comments, unwelcome jokes, teasing, and other similar verbal or physical conduct.

Any employee who feels that he or she is a victim of such harassment should immediately report the matter to their Supervisor, Manager or to any other member of management. If you have not received a satisfactory response within seven (7) days of reporting the matter, you should report the matter to Pat Nelson in Human Resources.

For the Company to be able to remedy alleged harassment, it is imperative that claims be brought to the attention of management. Failure to report claims of harassment hampers the Company's ability to take necessary steps to remedy such situations. Violations of this policy will not be permitted and may result in disciplinary action up to and including discharge.

All reports of harassment will be thoroughly and discreetly investigated by members of management that are not involved in the alleged harassment.

It is Company policy to prohibit harassment of any employee by any executive, supervisor, employee or visitor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Company. It is to ensure that at our Company all employees are

free from harassment on the basis of sex or gender. While it is not easy to define precisely what sexual harassment is, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, and other conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually-related comments, pictures or communications. Depending upon the circumstances, harassment can also include unwelcome joking, teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

Anyone who feels that he or she has witnessed or been subjected to sexual harassment should immediately report the matter to Pat Nelson in Human Resources. If you have not received a satisfactory response within seven (7) days of reporting the matter, you should report the matter to Michele Estep.

Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. Violation of this policy will result in disciplinary action, up to and including discharge of the harasser. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigation of such reports in accordance with this policy.

Open Door Policy

An open door policy is a communication process in which managers and executives at all levels have an “open door” in order to demonstrate availability for all employees of the Bank. Employees are encouraged to ask questions, discuss suggestions, and address problems or concerns with any level of management. The intention is to foster an environment of collaboration, high performance, and mutual respect.

If an aspect of your work is causing you concern, you have a responsibility to address the issue with a manager. If you have a problem, a complaint, a suggestion, or an observation, Sun managers want to hear from you. Through this practice, the Bank is able to improve, to address complaints, and to foster employee understanding of the rationale for best practices, processes and decisions.

It is our hope that most issues can and should be solved in discussion with your immediate supervisor; we encourage this as your first effort to voice concerns or make suggestions. You may also discuss your ideas and concerns with another level of management and/or Human Resources staff members if you desire. You will find managers at all levels of the organization willing to listen and help identify solutions, and share information and ideas

Anti-Retaliation/Whistleblower

Sun bans retaliation against employees who file or assist in proceedings related to alleged violations of Company policy and/or state/federal regulations; and/or refuse to participate in unlawful or unethical activity.

The EthicsPoint Hot Line provides a confidential vehicle for employees to report and/or question possible complaints or concerns regarding accounting, internal accounting controls or auditing matters of the Company.

Examples of work related issues include: violations of Company policy and/or Company Code of Ethics and Conduct which includes but is not limited to questionable accounting or auditing practices, misrepresentation or false statements to or by an officer, conflict of interest, falsification of contracts, reports or records, embezzlement, discrimination, harassment, misconduct or inappropriate behavior, sabotage or vandalism, securities violations, substance abuse, theft, and unsafe working conditions, questionable directives from management that an employee believes could have legal repercussions.

If you know of an unlawful or unethical situation, you should immediately inform your Manager/Supervisor. You can also contact Human Resources or advance to the level higher than your Manager/Supervisor if you feel the issue(s) at hand involves sensitivity related to your Manager/Supervisor. A third option available to all employees is through an outside vendor called Ethics Point. Reports can be made through confidential EthicsPoint web-site at <https://www.Ethicspoint.com> or by calling 866-311-5103. Links to the EthicsPoint are provided on the Company's intranet site. All calls/reports will be addressed confidentially with the appropriate parties.

See Appendix of Regulatory Notices and Policies for the [CEPA law](#).

Guide to Responsible Conduct

Employees are expected to govern their activities within legal, regulatory guidelines and the highest standards of ethics. Experience has shown that when employees conduct themselves in a professional, businesslike manner consistent with the Company Core values they work more efficiently and contribute to a positive atmosphere.

It is the philosophy of Sun to allow employees to govern their behavior out of respect for themselves and their co-workers and that this will foster an increased feeling of job satisfaction and self-worth.

There may be instances when employees choose not to accept the responsibility to perform duties within conduct required of their position. If this happens, the incident will usually be discussed with the employee for the purpose of correcting the behavior.

Employees are expected at all times to conduct themselves in an ethical manner in order to promote the best interests of the Company. All Loan Officers are expected to close loans according to Loan Committee approvals and any pre-approved exceptions. For your guidance, we have listed acts that may result in corrective action, up to and including termination.

This list provides examples of what may constitute inappropriate conduct. It is not, however, intended to be all inclusive:

- Falsification of records, which includes but is not limited to: deliberate falsification of Company records, such as employment applications, medical reports, expense accounts, teller proof sheets, absentee reports or time sheets, omission of facts, or giving false testimony.
- Insubordination.
- Unauthorized removal or malicious destruction of Company, government, vendor or employee funds and/or property.
- Fighting or engaging in any form of harassment (including sexual harassment).
- Disclosing trade secrets or confidential Company information or being careless with confidential information, including inappropriately sharing of another employee's salary information.
- Violation of security regulations, such as bringing firearms, weapons, tape recorders or cameras onto Company property; or any unauthorized entry to or exit from the Company premises.
- Violation of fire or safety regulations.
- Inappropriate, intentional intimidation or coercion of another employee.
- Conviction of a felony or crime involving dishonesty or moral turpitude.
- Attempting to cover up defective work. (Report all mistakes to your Manager/Supervisor immediately.)
- Giving or taking bribes in connection with Company business.
- Rude or curt treatment of customers, visitors, and coworkers.
- Concealment of interest or employment in any outside business which adversely affects the Company or the employee's performance.
- Substandard workmanship, negligence or inefficiency in the performance of duties.
- Failing to report to the proper person(s) any suspicious, unethical, or illegal conduct by coworkers, customers, or suppliers.
- Reporting to work under the influence of alcohol, illegal drugs, or narcotics, or using, selling, dispensing, or possessing alcohol, illegal drugs, or narcotics on Company premises.
- Using Company communications systems, including electronic mail, computers, Internet access, and telephones for any illegal or unethical purpose.
- Using profanity or abusive language.
- Misuse of employment privileges, accessing information for purposes other than on behalf of Sun, and performing transactions on one's own account, family member accounts, or accounts of significant other.

Clawback Policy

Any incentive payment, benefit, compensation payment or equity or cash award or amounts paid in respect thereof ("Compensation") to an employee of the Company or the Bank, or their affiliates, that was granted or paid based on financial statements or performance metrics that are subsequently restated or revised, as determined by the Compensation Committee (the "Committee") in its discretion, and other than as necessitated by changes in GAAP, shall be subject to recovery by the Company and/or the Bank and their affiliates. The amount

recoverable shall be the amount of the Compensation, net of applicable taxes paid by the employee.

The determination whether to seek recovery of Compensation from an employee shall be made by the Committee in its discretion, provided that, except in the case of fraud or intentional misconduct, such demand shall be limited to Compensation paid within the three-year period preceding the date on which the Company or the Bank, or their affiliates, is required to prepare the restatement (or, if not required to prepare the restatement, the date of the restatement) or revise the performance metric.

The employee shall comply with the Company's or Bank's demand within 60 days of the employee's notice thereof. The Company or the Bank, upon prior notice to the employee, may also, in its discretion, reduce amounts that would otherwise be payable to the employee under other compensation, equity or benefit plans or arrangements of the Company or the Bank, or their affiliates, or withhold future incentive awards that would otherwise be payable to the employee in order to facilitate such repayment by the employee.

The provisions of this Clawback Policy shall survive the termination or expiration of any applicable equity award plan and Compensation agreement with the employee, and employee's termination of employment. In addition to and not in limitation of the foregoing, the Company or the Bank, or their affiliates, may adopt additional clawback and Compensation recovery policies from time to time.

Conflicts of Interest

It is the policy of the Company to prohibit its employees from engaging in any activity, practice, or conduct which conflicts, or appears to conflict, with the interests of the Company. Because it is impossible to describe all of the situations that may cause or give the appearance of a conflict of interest, this list is not intended to be exhaustive.

- Employees are expected to represent the Company in a positive and ethical manner. Thus, employees have an obligation to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their Manager/Supervisor. Senior Management and others who have contact with customers and suppliers may be required to sign a special statement acknowledging their understanding of and adherence to this policy.
- No employee shall engage in any outside employment without first obtaining approval from their manager and next level manager. Any external employment relationship that presents, or appears to present, a conflict of interest is prohibited. (See Outside Employment Policy.)
- Association with governmental, municipal, educational, charitable, religious or other civic organizations is permitted. However, employees should inform their manager and the Human Resources Department of any such associations that may have the effect of presenting a conflict of interest.
- At least annually, each executive officer of Sun is required to report his or her related interests to the corporate secretary of the Company.

- Any actual or potential conflict of interest must be disclosed to the Company. Failure to do so may result in corrective action.

Outside Employment

No employee shall engage in any outside employment without first obtaining the approval of their Manager and Division Head. The Chief Administrative Officer after consultation with the Chief Risk Officer will provide a final review and approval. For purposes of this policy acting as an independent contractor or consultant and/or other self-employment arrangement is considered outside employment.

Each request for approval of outside employment will be evaluated based upon the employee's role and responsibility in the organization and the specific nature and potential conflict of interest of the external employment arrangement. The following are examples of circumstances whereby outside employment is prohibited.

- Employment with another banking institution or other direct competitor of Sun.
- Any independent outside employment relationship that would include another banking institution or other direct competitor of Sun as a customer or client.
- Outside employment that potentially interferes in any manner with the proper and effective performance of the employee's job duties and responsibilities (i.e. work schedule availability).
- Creates a conflict of interest or involves rendering advice or exercising judgment that is predicated on information derived, in any way, from or through employment with Sun or potentially adversely affects the Company.

Employees must inform their management of any change to the outside employment environment that might create a conflict of interest or otherwise disrupt the ability to meet their performance commitment and obligation to Sun. Managers will assess each situation, with Human Resources support, and make a determination on the continuation of the outside employment arrangement.

Any employee who does not disclose or otherwise misrepresents an outside employment relationship is subject to corrective action up to and including termination.

See Appendix for [Outside Employment Authorization Form](#).

Social Media

At Sun, we recognize that social media and other forms of online conversation represent an increasingly popular way for people to communicate. However, because social media is a very public and highly visible media, it is important for our employees to understand and follow basic guidelines when using social media, in order to ensure that the Company's, employees' and third parties' interest are properly protected.

For purposes of this policy, "social media" includes:

- Personal web sites
- Web logs (“blogs”)
- Multi-media and social networking websites such as Facebook, Twitter, LinkedIn and YouTube
- Wikis such as Wikipedia and any other site where text can be posted

In conjunction with established Code of Conduct and Computer and Internet Use Policies, use of Social Media Sites on Bank owned devices, for purposes of unethical or illegal activity, both in and out of the workplace is prohibited. Sun employees should adhere to the following guidelines when engaged in the use of social media:

- Employees are strictly prohibited from making statements on behalf of Sun or statements that may reasonably be attributed to Sun unless specifically acting within the defined scope of assigned duties and responsibilities.
- Refrain from using social media while on work time or on equipment Sun provides, unless it is work-related as authorized by your manager.
- Employees should maintain the confidentiality of Sun trade secrets, private or proprietary information. Trade secrets may include information regarding the development of systems, processes, products, vendors, know-how and technology. Confidential information includes customer information. Do not post internal reports, policies, procedures or other internal business-related proprietary communications.
- Should your online comments or posts result in you being contacted by third parties about the Company, please refer media inquiries to the Marketing Department.
- Always respect copyright, fair use, financial disclosure and other applicable laws.
- When posting on personal sites, always be clear that your comments are your own personal views and do not represent those of Sun. This includes instances when reference is made to the sunnationalbank.com address or www.sunnationalbank.com domain. It is best to include a disclaimer such as: "The views expressed on this [blog; website] are my own and do not reflect the views of my employer".
- Do not use personal email and social media for business purposes. Do not post specific information about the Bank’s products, fees or pricing; those types of advertisement are subject to regulatory review and must be originated from the Bank’s Marketing Department.
- Social media allows for instantaneous communication but whatever you post may be around for a very long time...and is viewable by almost anyone. Remember, you are responsible for your web postings and that makes you liable for web postings found to be defamatory, harassing, an invasion of privacy or in violation of any other applicable federal or state law.
- When using any form of social media, in relation to the Company, always use best practices and proper on-line etiquette as outlined in the [Guide to Proper On-line Behavior](#).

It is expected that all employees will be courteous to fellow employees, suppliers or people who work on behalf of Sun. Also, keep in mind that you are more likely to resolve work related complaints by speaking directly with your co-workers or by utilizing Sun’s internal processes than by posting complaints to a social media outlet. Nevertheless, if you decide to post

complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparages customers, co-workers, vendors or people who work on behalf of Sun, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other protected status.

These guidelines are intended to provide employees with best practices for freely and fully participating in the social media space, while ensuring that the Company's confidential proprietary information and other interests are protected.

Sun will take the necessary steps to enforce this policy, including monitoring social media. It is the Company's expectation that this policy will be carefully adhered to by all employees. Should we be made aware, either directly or indirectly, of an employee's potential disregard for these guidelines it will be treated as a potential policy violation and be investigated and resolved in a manner consistent with the Bank's corrective action process for a violation of policy.

These guidelines and policies are not intended to, and will not be enforced, to discourage, prohibit or interfere with any employee's federal or state labor law rights, including rights under the National Labor Relations Act, including Section 7 Activity or any whistleblower protections under federal or state law.

As additional references, please also see the [Guide To Proper On-Line Behavior](#), and [Acceptable Use Policy](#).

Employment of Relatives

We have no general prohibition against hiring relatives. However, restrictions have been established to mitigate any potential problems of safety, security, supervision, conflict of interest and morale. While we accept and consider applications for employment from relatives, relatives generally will not be hired, transferred, or promoted into positions where they directly or indirectly supervise or are supervised by another relative. Relatives may not be assigned to the same department or cost center where a potential conflict of interest may occur. Where relatives possess lending authority, or other approval authority, in concert with one another, the company will take appropriate action to mitigate risk and to eliminate any real or perceived conflict of interest that may be caused. Such action may include removal of lending or approval authorities, change in job duties, reassignment to another position, or if necessary separation of employment. If an employee marries another employee or otherwise become related, these employees generally will not continue to be employed within the same department or cost center. Any exception must be approved by the department's Management Committee member and Human Resources. Relatives are defined as immediate family members including spouse, a partner in a Civil Union, domestic partner, siblings, children, in-laws, aunts, uncles and first cousins.

Confidential Nature of Company Affairs

The internal business affairs of the organization, particularly confidential information and trade secrets, represent Company property that each employee has a continuing obligation to protect.

- Information designated as confidential may not be discussed with anyone outside of the organization and may be discussed within the organization only on a “need to know” basis. In addition, employees have a responsibility to avoid unnecessary disclosure of non-confidential internal information about the Company, its employees, its customers, and its suppliers. However, this employee responsibility to safeguard internal Company affairs is not intended to impede normal business communications and relationships.
- Sun strictly prohibits deriving financial benefit from confidential information that could be obtained only by reason of employment, whether such information relates to the bank, its customers, or anyone with whom it has business relations. Confidential information includes all non-public information that might be of use to competitors, or harmful to Sun or its customers if disclosed. Officers shall refrain from engaging in activities that result in their receipt of an improper benefit from their relationship with the Company. Officers shall not usurp corporate opportunities.
- Employees authorized to have access to confidential information may be required to sign special nondisclosure agreements and must treat the confidential information as Company property and protect its confidential nature. Prior to disclosure, any questions regarding disclosure of confidential information should be reviewed with the Senior Management of Sun, the Senior Management of the affiliate of Sun by which the employee is employed, or the General Counsel for Sun or the affiliate for which the employee is working.
- Inside information is “material, nonpublic” information about a company or corporation. “Material” information is information of such importance that it can be expected to affect the judgment of investors as to whether or not to buy, sell or hold a company’s securities. “Nonpublic” means it is not generally available to the public. At times, confidential prior to disclosure. If such information is used or disclosed, the employee, the Company, and anyone outside of the Company to whom the information is disclosed could be subject to civil and criminal liability, including imprisonment, under federal and state securities laws.
- Any information or examination ratings received in conjunction with the examination results of any federal or state regulatory agency is privileged (with the exception of Community Reinvestment Act public ratings) and disclosure of that information is a violation of federal law.
- Department Managers/Supervisors are responsible for identifying information that should be classified as confidential and should work closely to develop procedures to secure and control the information. Information that is designated as confidential should be properly secured.

Proprietary Information and Trade Secrets

Employees have access to a broad range of proprietary information and are obligated to use this information only to the extent necessary for the performance of their duties. Such information

may not be disclosed in any form to any person not representing the Company. Any disclosure and/or use of proprietary information unrelated to the performance of an employee's job, even if only from memory, during employment and after termination, will be a violation of this policy.

Non-Solicitation of Employees

For a period of twelve (12) months following termination of employment, an individual will not, directly or indirectly, solicit or entice for employment or hire, any Company employee without the written consent of Sun.

Non –Solicitation of Customers

For the period of (12) months following termination of employment, an individual will not, directly, or indirectly, solicit customers of Sun for any reason. Customer information obtained while employed with Sun is proprietary information intended for the sole use of Sun. The company reserves the right to provide a copy of this policy to future employers.

Gifts and Entertainment

Under the Bank Bribery Act, you could be guilty of a serious federal crime if you solicit, receive or agree to receive anything of value (including services), for yourself or anyone related to you from any person in connection with any transaction or business of Sun.

The Bank Bribery Act provides for significant fines and imprisonment.

The person giving anything of value (including services) is subject to the same penalties.

The following OCC and Department of Justice guidelines are adopted by Sun:

A "reasonable" standard of conduct is one that permits a Director, Officer or employee to receive the normal amenities that facilitate the discussion of business. This might include a business meal or modest entertainment, but would exclude the receipt of benefits that serve no demonstrable business purpose, such as a weekend hunting or fishing expedition or the receipt of scarce or expensive tickets to athletic or theatrical events.

Conduct that falls within reasonable standards of behavior and which is calculated to do nothing more than facilitate the discussion of bank business or to foster good business relations within a community presents no corrupting threat to the employee's fiduciary duty and is inappropriate for prosecution. Similarly, receipt of insignificant gifts of modest or nominal value would not entail a breach of a Director's, Officer's, or employee's fiduciary duty or entail dishonesty.

The U.S. Department of Justice, in setting forth guidelines for the U.S. Attorneys concerning violations of the Bank Bribery Act, stated that the law will be enforced in light of reasonable conduct.

No Director, Officer, or employee shall solicit anything of value (including services) either for the Director or for any other person or organization, from any person or organization, for or in connection with any transaction or business of Sun.

No Director, Officer or employee shall accept or agree to accept, either for the Director or for any other person or organization any cash payment or anything substantially equivalent to cash (including, without limitation, any deposit or bond) in connection with a transaction or business of Sun.

No Director, Officer or employee shall accept anything of value (including services) from any customer or supplier that does not meet the standard of “reasonableness” as set forth in the above outlined paragraph.

No Director, Officer or employee shall accept or agree to accept anything of value (including services) either for the Director or for any other person or organization if it is intended to, or would, influence the Director, Officer or employee in the conduct of the business of Sun.

Any Director, Officer or employee who is offered or receives something of value beyond that authorized, is required to disclose that fact to the Chief Risk Officer. You are also required to disclose all potential conflicts of interest, including inadvertent ones that arise due to business or personal relationships with customers, suppliers, business associates, or competitors of the Bank. Sun’s general rule against accepting gifts is to prevent corruption or breach of trust. For this reason, insignificant gifts or entertainment of modest or nominal value that does not involve any improper or illegal or corrupt motives may be accepted.

Personal Finances of Employees

Company employees should meet their financial obligations in a timely manner.

- Employees should manage their personal finances so that they do not adversely affect job performance or the Company’s public image. The failure of employees to meet financial obligations may impose an administrative and financial burden on the Company through extra bookkeeping and the need to respond to legal notices and court orders.
- The Company will not disclose employee financial information to outside parties without express written permission from the employee, except as required by law.
- The Company will conduct credit checks of final applicants considered for employment. In addition, the Company may conduct credit checks on current employees being considered for promotions or transfers to positions where personal financial considerations may impact the employee’s ability to perform the job.
- The Payroll Department is the only person authorized to receive a writ of garnishment or attachment, a notice of levy by any taxing authority, or any other similar order requiring payment of a portion of an employee’s compensation to someone other than the employee. The Payroll Department will notify the affected employee and then deduct the required amount from the employee’s earnings, up to the limit permitted by law.

- The Company will not deny employment to, or terminate the employment of, any person solely because that person has filed a petition for bankruptcy.

Political Contributions

No Company funds or assets shall be used to make any political contributions in any country other than the United States. Sun may make political contributions of funds or assets to the extent permitted by applicable law only with prior authorization of the CEO.

Unusual Payments

No false or deceptive entries shall be made in Sun's books or records. No Company fund or asset that is not disclosed in such books and records shall be established for any purpose.

No payment on behalf of Sun shall be made or approved with the intention or understanding that any part of such payment is to be used for a purpose other than that described in the documents supporting that payment.

No person who has a decision-making role on behalf of a customer of Sun in a contemplated loan or deposit transaction shall be paid any commission or other payment in connection with that loan or deposit.

Compliance with All Applicable Government Laws, Rules and Regulations

All employees are required to comply with all applicable government laws, rules and regulations and to report violations thereof to Human Resources.

All employees are expected to assist the Company in providing full, fair, accurate and timely disclosure in reports and documents filed with the Securities and Exchange Commission and in other public communications made by Sun.

The Company will not allow any form of retaliation against individuals who report alleged violations of any laws, rules or regulations. Retaliation is unacceptable, and any form of retaliation in violation of this policy will result in disciplinary action, up to and including discharge.

Customer Service

It is the policy of the Company to be customer and service oriented and to require employees to treat customers in a courteous and respectful manner at all times.

Our customers provide the primary source of the Company's income and each employee's job security. To promote excellent relations with our customers, all employees must represent the Company in a positive manner and make customers feel appreciated when dealing with the organization.

Employees with customer contact are expected to know the Company's products and services and to learn what customers want and need. These employees should educate customers about the use of the organization's products and services and should seek new ways to serve customers.

Employees are encouraged to report recurring customer-related problems to their Manager/Supervisor and to make suggestions for changes in Company policies or procedures to solve problems.

Employees should be prepared to listen carefully to customer complaints and handle them in a helpful, courteous manner. If a controversy arises, the employee should explain Company policy respectfully and clearly. Customers who become unreasonable, abusive, or harassing should be referred to the employee's Manager/Supervisor if the employee cannot resolve the problem.

Employees should be polite and thoughtful when using the telephone. A positive telephone contact with a customer can enhance goodwill, while a negative experience can destroy a valuable relationship.

Distribution and Administration of This Policy

The Human Resources Department shall make sure that this Code of Ethics and Conduct is distributed electronically to each officer and employee at the time of employment.

Each employee will re-affirm their adherence to the Code of Ethics and Conduct of Sun on an annual basis. Acknowledgement indicating that each employee has received, read, understands and agrees to be bound by the contents of the policy is required. Employee affirmation is electronically filed by accessing their individual employee record through <https://workforcenow.adp.com> and entering a review confirmation date.

The Human Resources Department shall review this policy on an annual basis to assure compliance with any required changes, including government legislation affecting the interpretation and inclusions to this policy.

Employees failing to adhere to this policy may be subject to corrective action, up to and including termination, and may be subject to legal action.

Waivers to this policy for Executive Management may only be granted by the Board of Directors or one of its designated committees. Any such waivers shall be publicly disclosed. Other waivers to this policy will be approved by Human Resources.

The Code of Ethics shall be publicly available.

All violations of this policy shall be immediately reported to the Human Resources Department.