



THE BANK OF STAR VALLEY
and
STAR VALLEY BANCSHARES, INC.
CODE OF ETHICS

Approved: September 2015

Board Review/Update: February 2026

POLICY STATEMENT:

The Bank of Star Valley and its holding company, Star Valley Bancshares, Inc. (collectively, the “Bank”) expect all employees and directors to be honest and forthright in all dealings. When violations of this policy occur, management and the Board of Directors shall take responsibility and will address such matters promptly and appropriately.

INTRODUCTION:

Since its incorporation in 1996, the employees and directors of The Bank of Star Valley and Star Valley Bancshares, Inc. have demonstrated a strong commitment to fair, honest, and ethical conduct in all activities conducted on behalf of the Bank. This Code of Ethics (the “Code”) is intended to reaffirm that long-standing tradition and to clearly articulate the standards by which all employees and directors are expected to conduct themselves.

This Code identifies the Bank’s core values and outlines the standards and procedures designed to ensure those values are consistently upheld. All employees and directors are expected to be familiar with, understand, and comply with the standards set forth in this Code.

This Code is not intended to be exhaustive. Because it cannot address every possible situation, employees and directors are expected to exercise sound judgment and to raise questions when uncertainty exists. Employees should seek guidance from their supervisor or executive officers when a situation is not clearly addressed by this Code. Directors should consult with the Chairman of the Board or the Audit Committee when questions arise regarding applicable standards.

The Board of Directors and management believe that ethical standards are best achieved not only through publication of this Code, but through ongoing, open discussion of ethical issues related to the Bank’s business. This open-door environment exists only when employees and directors understand they may raise questions or concerns without fear of retaliation.

STANDARDS OF CONDUCT:

Employees and directors are expected to uphold the Bank’s values and must promptly report any situation in which they reasonably suspect a violation of law, regulation, Bank policy, or this Code.

- A.** Employees and directors shall deal honestly and fairly with customers, fellow employees, regulators, third-party vendors, and all others with whom the Bank conducts business.
- B.** Employees and directors are prohibited from offering bribes, kickbacks, or any other form of improper payment—directly or indirectly—to any government official, customer, vendor, or other party for the purpose of obtaining business, contracts, benefits, or governmental action.
- C.** Employees and directors are prohibited from accepting bribes, kickbacks, or improper payments from any person or entity. They may not accept gifts or favors valued at more than **Five Hundred Dollars (\$500.00)** from current or prospective customers or vendors.
- D.** Employees and directors shall limit reimbursable expenses to those that are prudent, reasonable, and directly related to Bank business.
- E.** Employees and directors shall not take unfair advantage of customers or other parties through manipulation, concealment, misuse of privileged information, or any other unfair or deceptive practice.
- F.** Employees and directors shall not participate in, permit, or facilitate the unauthorized use or disclosure of confidential Bank or customer information during or after their relationship with the Bank.
- G.** Employees shall not knowingly engage in money laundering or assist any individual or entity in money laundering activities.
- H.** Employees shall not structure, or assist in structuring, transactions for the purpose of avoiding currency reporting requirements under the Bank Secrecy Act (BSA).
- I.** Employees shall not embezzle, steal, or misappropriate funds, assets, or credits belonging to customers or the Bank.
- J.** Employees and directors shall not use the Bank’s name, logo, or corporate letterhead for purposes outside the normal course of official Bank business without express approval from the CEO and/or Chairman of the Board.
- K.** Employees and directors shall refer all inquiries from reporters or other media representatives to the CEO, CFO, and/or Chairman of the Board.
- L.** Employees and directors shall avoid personal financial circumstances that could result in overextension of credit, wage garnishments, overdrafts, or other financially embarrassing situations that could reflect adversely on the Bank.

CONFLICTS OF INTEREST:

A conflict of interest exists when an employee or director is involved in a decision in which they, or a family member or close associate, have a personal interest that could influence—or appear to influence—the decision.

- A. Employees and directors shall not seek personal benefit through arrangements with customers, vendors, suppliers, or other parties doing business with the Bank.
- B. Directors and executive management shall annually, or when a potential conflict reasonably arises, disclose conflicts of interest to the Chairman of the Board.
- C. Employees shall disclose any actual or potential conflict of interest to the CEO when such conflict may reasonably be perceived.
- D. Employees and directors shall not maintain a financial interest, including significant stock ownership, in any entity with which they conduct Bank business if such interest creates or appears to create a conflict of interest.
- E. Employees and directors shall maintain a log of any single gift received from outside individuals or entities. This log shall be submitted to the CFO annually. No employee or director may accept a gift valued at **Five Hundred Dollars (\$500.00)** or more if offered due to their employment or position with the Bank.
- F. Employees and directors shall not engage in activities that interfere with or conflict with the interests of the Bank.

CONFIDENTIALITY OF INFORMATION:

Employees and directors are routinely entrusted with confidential information, including customer personal and financial data, business plans, and proprietary Bank information. Such information is the property of the Bank and is held solely for legitimate business purposes.

Employees and directors shall:

- A. Not discuss confidential information with unauthorized persons unless required for legitimate Bank business. Unauthorized persons include individuals not directly involved in the relevant transaction, including family members, friends, and uninvolved employees or directors.
- B. Use confidential information solely for legitimate Bank purposes and never for personal gain.
- C. Not disclose confidential information to third parties unless necessary for business purposes and appropriate safeguards are in place.
- D. Not use Bank information, property, or resources for personal benefit or for the benefit of others.

SHAREHOLDER COMMUNICATIONS:

The Bank is committed to transparent and accurate communication with shareholders and shall:

1. Provide shareholders with all information to which they are legally entitled.
2. Ensure information is accurate, complete, and understandable.

3. Refrain from knowingly making false or misleading statements.

FINANCIAL REPORTING AND RECORDKEEPING:

The Bank shall:

1. Follow Generally Accepted Accounting Principles (GAAP) and applicable FFIEC Call Report instructions.
2. Maintain effective internal accounting controls to ensure accurate transaction recording and availability of material information to management and the Board.
3. Maintain books and records that accurately reflect the Bank's financial condition.
4. Ensure records and documents are properly retained and secured.
5. Conduct at least an annual independent audit to assess financial reporting and internal controls.
6. Prepare and present financial information in a clear and orderly manner.

LEGAL AND REGULATORY COMPLIANCE:

The Bank shall comply with all applicable federal, state, and local laws and regulations and shall maintain a work environment free from harassment, discrimination, and retaliation.

REPORTING VIOLATIONS:

All employees and directors are responsible for reporting suspected violations of law, regulation, Bank policy, or this Code. Reports may be made confidentially, in person or in writing, to the CEO, Chairman of the Board, or corporate legal counsel.

Reports will be promptly investigated, and appropriate corrective action will be taken. Individuals who report concerns in good faith may do so without fear of retaliation.

EMPLOYEE AND DIRECTOR EDUCATION:

All employees and directors shall receive a copy of this Code annually and participate in training or communications designed to ensure continued understanding and compliance.

SUSPICIOUS ACTIVITY:

A Suspicious Activity Report (SAR) shall be filed in accordance with Bank policy for any reportable suspicious activity involving a director, officer, or employee. Criminal activity shall be reported to appropriate legal authorities as required by law.

MONITORING AND ENFORCEMENT:

Employees and directors are responsible for monitoring compliance with this Code and cooperating with investigations. Violations may result in disciplinary action, up to and including termination or removal, depending on the circumstances.