



Code of Ethics and Conduct Policy

Purpose and Application

This Code of Ethics and Conduct (this “Code”) has been adopted by the Board of Directors of HomeTrust Bancshares, Inc. (the “Company”) to detail the standards of conduct and ethics required of all directors (including HomeTrust Bank Board and all partner bank directors), officers and employees of the Company and its subsidiaries. References in this Code to the “Company” include HomeTrust Bancshares, Inc. and its subsidiaries unless the context indicates otherwise.

This Code is intended to deter wrongdoing and promote:

- ✓ Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- ✓ Full, fair, accurate, timely and understandable disclosure in documents the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in all other public communications made by the Company;
- ✓ Compliance with applicable governmental laws, rules and regulations;
- ✓ Prompt internal reporting to designated persons of violations of this Code; and
- ✓ Accountability for adherence to this Code.

This Code applies to all directors, officers and employees of the Company and its subsidiaries. This Code applies to all employee decisions and activities within the scope of employment, or when representing the Company in any capacity. The Company expects honest and ethical conduct in all aspects of our business from all directors, officers and employees. A director or officer serves as an example for other employees and is expected to foster a culture of transparency, integrity and honesty. Directors and officers should encourage employees to apply the Code to their daily activities and decisions, and to seek guidance from the appropriate individuals when additional information or explanation is needed. A principal aspect of our business is the trust and confidence of our customers. With this principle in mind, all directors, officers, and employees must ensure that honesty and integrity are among the Company’s highest priorities. Any violation of the Code may result in disciplinary action, up to and including termination of employment.

Our Values

We value our **customers** because serving them is HomeTrust Bank’s primary mission.

- ✓ We provide friendly, hometown, personal service.
- ✓ We provide value-added products to help our customers achieve their financial goals.
- ✓ We serve each customer with respect, appreciation, and integrity.

We value our **communities** because they are essential to our future growth and success.

- ✓ We invest in our communities to foster growth.
- ✓ We are passionate about financing homes for families and the needs of small businesses.
- ✓ We make it possible for low-and-moderate-income families to achieve homeownership.
- ✓ We support education, health, the arts, and other appropriate charitable activities.
- ✓ We value our **employees** because they are the foundation of HomeTrust Bank.
- ✓ We support each employee's professional growth.
- ✓ We nurture a family atmosphere through mutual respect, integrity, honesty, teamwork, and pride in our work.
- ✓ We offer competitive benefits.
- ✓ We encourage a healthy balance between home and work.

We value our **financial strength** because it is the key to preserving hometown banking and because it enhances the long-term value of our Company to stockholders.

- ✓ We follow prudent financial management policies.
- ✓ We focus on continuous improvement in every aspect of our operations to enhance our efficiency and profitability.
- ✓ We carefully manage risk.
- ✓ We seek to maintain a strong capital position.
- ✓ We are committed to safety and soundness.

Administration of the Code

The HomeTrust Bancshares, Inc. Board of Directors is responsible for setting the standards of conduct contained in this Code and updating these standards as it deems appropriate, giving consideration to the recommendations of the Governance and Nominating Committee of the HomeTrust Bancshares, Inc. Board of Directors, to reflect changes in the legal and regulatory framework applicable to the Company, business practices within the Company's industry, and the Company's own business practices. It is the individual responsibility of each director, officer and employee of the Company to comply with the requirements of this Code.

Laws, Regulations, Policies and Procedures

All directors, officers, and employees of the Company are expected to understand, respect, and strive to comply with both the spirit and the letter of the laws, regulations, policies and procedures that apply to them in their position(s) with the Company. The Company is committed to:

- ✓ Maintaining a safe and healthy work environment;
- ✓ Promoting a workplace that is free from discrimination or harassment based on race, color, religion, sex or other factors unrelated to the Company's business interests;

- ✓ Supporting fair competition and laws prohibiting restraints of trade and other unfair trade practices;
- ✓ Conducting its activities in compliance with all applicable environmental laws;
- ✓ Keeping the political activities of the Company's directors, officers and employees separate from the Company's business;
- ✓ Prohibiting any illegal payments to any government officials or political party representatives of any country; and
- ✓ Complying with all rules and regulations of the Company's primary federal and state regulators and other applicable regulatory authorities that govern the Company's activities.

Conflicts of Interest

Directors, officers, and employees have an obligation to avoid conflicts of interest including the appearance of a potential for a conflict of interest, involving the Company and its business.

A potential conflict of interest arises when a director, officer or employee has an interest in any matter that could affect, or appear to affect, his judgment in fulfilling his responsibilities to the Company. A potential conflict of interest may also arise when they are in a position to influence a Company decision that may result in financial or other personal gain for them or their immediate family. For purposes of this Code, immediate family members include spouses, domestic partners, parents, children, siblings, grandparents, parents-in-law, brothers and sisters-in-law, sons and daughters-in-law, and any other relative or person living in the same household.

For example, conflict situations can arise when a director, officer or employee:

- ✓ Is a consultant to or a director, officer or employee of an outside business:
 - That markets products or services in competition with the Company's current or potential products and services;
 - That supplies products or services to the Company; or
 - That purchases products or services from the Company;
- ✓ Has any financial interest, including stock ownership, in any such outside business that might create, or could reasonably be expected to give rise to, a conflict of interest, excluding ownership of securities that are listed on a securities exchange or trade in the over the counter market and that represent less than 1% of the issuer's outstanding voting securities or ownership of securities held in a portfolio of securities, such as a mutual fund. In making personal investments, all directors, officers and employees should be guided by a keen awareness of potential conflict. In addition, personal investments should not influence a director's, officer's or employee's judgment or action in the conduct of the Company's business;
- ✓ Seeks or accepts any personal loan or service from any such outside business, except from financial institutions or service providers offering similar loans or services to third parties under similar terms in the ordinary course of their respective business;

- ✓ Is a consultant to or a director, officer or employee of an outside business if the demands of the outside business would interfere significantly with the director's, officer's or employee's responsibilities with the Company;
- ✓ Accepts any personal loan or guarantee of obligations from HomeTrust Bank, except to the extent such arrangements are legally permissible;
- ✓ Conducts business on behalf of the Company with immediate family members; or
- ✓ Uses the Company's property, information or position for personal gain. In this regard, confidential information about the Company and its customers and suppliers acquired by directors, officers and employees in the course of their duties is to be used solely for the Company's purposes, and not as a basis for personal investment by directors, officers and employees or their immediate families.

In and of themselves, not all conflicts of interest are inherently improper. In many cases, it is the manner in which an individual and the Company deal with the conflict that determines the propriety of the action and conduct. Thus, any employee who becomes aware of a conflict or potential conflict of interest with respect to his or her work with the Company, or any material transactions or relationships that could be expected to give rise to a conflict of interest, or appearance of a conflict of interest, shall disclose such situations in writing to his or her supervisor so that appropriate safeguards can be established to protect all parties. Directors and executive officers should make such disclosures to the HomeTrust Bancshares Chief Executive Officer or to the Chairman of the Audit, Compliance, Enterprise Risk (ACER) Committee, who are responsible for communicating such disclosures to appropriate parties and reporting them at the next meeting of the HomeTrust Bancshares, Inc. Board of Directors.

If any employee or director has an interest in any matter or transaction to be brought before the Board of Directors, that person must:

- ✓ Disclose to the board the existence, nature and extent of the interest and all pertinent facts related to the matter or transaction under consideration;
- ✓ Leave the room and refrain from participating in the board's discussion of the matter or transaction; and
- ✓ Abstain from voting on the matter or transaction (for directors). The director must not be present for the vote, and the absence and abstention must be recorded in the minutes.

Outside Activities

Outside activities that might constitute a conflict of interest or interfere with performance, or compromise a director's or employee's position, are to be avoided. Employee activities such as full-time outside employment; the rendering of investment, legal or accounting services; membership on corporate boards of directors; seeking of an elective political position; or appointment to government bodies should be reviewed and approved by the HomeTrust Bancshares, Inc. Chief Executive Officer prior to undertaking such activities to ensure that such activities will not interfere or otherwise conflict with the fulfillment of the employee's duties to the Company. Any such activities that are proposed to be conducted by the Chief Executive Officer should be reviewed and approved by the HomeTrust Bancshares, Inc. Board of Directors. As in the past, we continue to encourage active participation on the part of directors, officers and

employees in service clubs and organizations fostering the betterment of the community, and the active use of various social memberships in maintaining a proper image of our organization within the community.

Preferential Treatment in Providing Services

Every customer and employee is entitled to respect, courtesy and equality. Employees must provide the highest level of professionalism and service on a consistent and equal basis. The following are guidelines on how to avoid preferential treatment of certain individuals or businesses.

- ✓ Employees must avoid favoring the interests of certain customers, suppliers or other employees. All standard practices, policies and procedures apply to all similarly situated individuals and the general public.
- ✓ Employees must avoid giving preferential treatment to a director, officer, employee, customer, supplier or others because of a personal relationship.
- ✓ Employees must avoid the appearance of, or actual preferential treatment for themselves, relatives or business associates. Employees may not be involved in Company matters regarding their own business or the business of their relatives or business associates. This includes, without limitation, involvement in the approval of loans to these parties. In such situations, employees should have an unrelated and uninvolved employee handle the matter.

Acceptance of Gifts – Bribery

Federal law prohibits any director, officer, employee, agent or attorney of the Company, or any affiliate, from corruptly soliciting or accepting anything of value from anyone if there is an intent that such persons will be influenced or rewarded in connection with the Company's business or information that such persons may have about the Company.

There are a number of instances where a director, officer, employee, agent, or attorney of the Company may accept something of value from one doing or seeking to do business with the Company without risk of corruption or breach of trust. Such exceptions may include:

- Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those between the parents, children or spouse of a Company official) where the circumstances make it clear that it is those relationships rather than the business of the Company which are the motivating factors;
- Acceptance of meals, refreshments, entertainment, accommodations or travel arrangements (of reasonable value) in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided the expense would be paid for by the Company as a reasonable business expense if not paid for by another party;
- Acceptance of loans from other banks or financial institutions on customary terms to finance proper and usual activities of Company officials, such as home mortgage loans, except where prohibited by law;

- Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars and similar items;
- Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers;
- Acceptance of gifts of reasonable value that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, holiday or birthday;
- Acceptance of civic, charitable, educational, or religious organization awards for recognition of service and accomplishment.

Employees must disclose circumstances not identified above on a case by case basis to the Chief Administration Officer (or designee) with written disclosure of all relevant facts. The Chief Administration Officer is responsible for assessing the situation to ensure it does not pose a threat to the integrity of the Company, and for maintaining records of all disclosures made in accordance with this Code. Any situation that may have a significant impact on the Company's integrity must also be reviewed by the HomeTrust Bancshares, Inc. Chief Executive Officer. Directors and executive officers should make such disclosures to the HomeTrust Bancshares, Inc. Chief Executive Officer for evaluation.

Business Opportunities Outside the Company

Directors, officers, and employees must not compete with the Company, profit or otherwise take advantage from inside information, or take business opportunities that are within the line of business conducted by the Company. Nor may they divert such information or opportunities to others. They must not use Company property or information, or their position with the Company, for personal gain. Directors, officers and employees have a duty to the Company to advance the Company's legitimate interests when the opportunity to do so arises.

Confidentiality of Information

Confidentiality is a fundamental principle of the financial services business. In the course of performing their duties, directors, officers and employees of the Company may acquire confidential information. Confidential information includes all non-public information that might be of use to competitors or be harmful to the Company or its customers, if disclosed. Confidential information, in any form, obtained through business or personal contacts with customers, prospective customers, suppliers, or other employees shall be used solely for the Company's purposes. Directors, officers and employees shall maintain the confidentiality of all information entrusted to them by the Company, its customers, suppliers or other business partners, except when disclosure is authorized or is legally required. To avoid inadvertent disclosure of confidential information, directors, officers and employees shall not discuss confidential information with, or in the presence of, any unauthorized persons, including family members and friends.

Confidential information includes:

- ✓ Information marked with legends such as "confidential", "private", "for internal use only";
- ✓ The identity of customers and potential customers and their personal, business and financial information;

- ✓ Non-public business and financial information of the Company;
- ✓ Information related to, including the identity of, potential candidates for mergers and acquisitions;
- ✓ Technical information relating to current and future products, services or research;
- ✓ Business or marketing plans or projections;
- ✓ Personnel information;
- ✓ Vendor and customer lists;
- ✓ Communications by, to and from regulatory agencies;
- ✓ Certain communications with or from attorneys for the Company, whether internal or external and
- ✓ Other non-public information that, if disclosed, might be of use to the Company's competitors, or harmful to the Company or its vendors, customers or other business partners.

The Bank has also adopted a Customer Privacy Policy, which is located on SharePoint, the Bank's Intranet site. The policy describes information the Bank will collect from a customer, and when the information may be shared with other entities.

Some confidential information is also *material non-public information* within the meaning of the federal securities laws. Material non-public information is information regarding the Company that has not been publicly disclosed and that a reasonable person would consider important in deciding whether to buy, sell or hold the Company's securities. Trading the Company's securities while in possession of material non-public information or disclosing such information to others who may in turn trade on the basis of that information could result in substantial civil and criminal penalties for all persons involved. The Company has a separate Insider Trading Policy applicable to all directors, officers and employees.

Protection and Proper Use of Company Assets

The Company's equipment and facilities, and the services of its personnel, are valuable assets. The unauthorized use of Company assets for personal or other purposes without compensation that do not further the Company's interests is a misuse of Company assets.

Directors, officers and employees are personally responsible for protecting those Company assets that are entrusted to them and for helping to protect the Company's assets in general. Directors, officers and employees shall use the Company's assets for the Company's legitimate business purposes only, unless specifically permitted otherwise.

Conduct and Integrity

Directors, officers and employees of the Company are expected to maintain high standards of personal behavior at all times.

Proper Accounting and Maintenance of Company Records

Directors, officers and employees of the Company are expected to record and report all Company transactions and operating information fully, accurately and honestly. All accounts, entries and transactions must be supported by adequate documentation, and no relevant information is to be omitted, altered or concealed. In this regard, all officers and employees are expected to observe and comply with generally accepted accounting principles, the system of internal controls and disclosure controls and procedures established by the Company requiring that corporate books and records accurately and fairly reflect in reasonable detail the financial condition and results of operations of the Company. Company policies are intended to promote full, fair, accurate, timely and understandable disclosure in reports and documents filed with or submitted to the SEC and in the Company's public statements. In furtherance of these requirements, officers and employees must practice the following:

- ✓ No false, misleading or artificial entries shall be made on corporate books, records and reports for any reason.
- ✓ No undisclosed or unrecorded corporate funds or assets shall be established for any purpose.
- ✓ No payments from corporate funds or other assets shall be approved or be made with the intention or understanding that any part of such payment will be used for any purpose other than that described by the documents supporting the payment. All payments must be supported with appropriately approved purchase orders, invoices or receipts, expense reports or other customary documents, all in accordance with established policy

Business and financial records are to be retained in accordance with federal and state laws, as well as the Company's record and document retention policies. Documents should never be altered or destroyed in anticipation of an internal or external audit or in response to a request for such documents by any government or regulatory agency or court of law. Full cooperation with bank examiners, internal auditors, external auditors, compliance staff, accountants, and any other regulatory examiners, is expected and required.

Communication with the Media and Other Outside Parties

Even though the Company has a policy of maintaining good media relations and tries to respond to all media questions, there is much information about the Company, its activities and employees that should not be made available to the public for various reasons. Neither the public nor the news media has a right to know everything that is known to employees and directors of the Company. For instance, a business has a responsibility not to divulge information to the public about its customers. In addition, the SEC's Regulation Fair Disclosure (FD) generally prohibits the selective disclosure of material non-public information regarding the Company. For these and other reasons, directors, officers, and employees should be mindful of their duty to the Company and not release confidential information.

If an inquiry is made about the Company or its business by the news media or by the investment community (i.e., stockholders and other investors, securities market professionals such as brokers, dealers, investment advisers or institutional investment managers, investment companies and securities analysts), the person to whom the inquiry is directed should seek the advice of one of the Company's executive officers. The Company's CEO or his designate, are the only persons

authorized to answer questions by the media or by the investment community. Personnel who are not authorized to answer questions by the media or the investment community will not suffer adverse consequences from the Company for refusing to answer questions.

Obtaining Guidance: Reporting Illegal or Unethical Behavior

If you need additional explanation regarding a particular provision of this Code, or if you need guidance in a specific situation, including whether a potential conflict of interest may exist, please contact your immediate supervisor. If you are uncomfortable speaking to your immediate supervisor, or if you require additional guidance after having consulted with your supervisor, you are encouraged to contact the Chief Administration Officer at 828-350-4808.

You are expected to remain alert to situations that could cause illegal, unethical or improper actions under this Code. Such situations and any violations or suspected violations of this Code, other Company policies and procedures, or any applicable law, rule or regulation should be promptly reported as soon as it is discovered. **Employees should report such actions to the Internal Audit Department. Directors and executive officers should make such reports to the HomeTrust Bancshares, Inc. Chief Executive Officer or to the Chairman of the ACER Committee, who are responsible for communicating such reports to appropriate parties and reporting them at the next meeting of the HomeTrust Bancshares, Inc. Board of Directors.** Concerns regarding questionable accounting, internal accounting controls or auditing matters may be directed to the Chairman of the ACER Committee by writing to the Chairman at the following address: P. O. Box 10, Asheville, NC 28802.

All concerns or complaints will be promptly investigated and appropriate action taken. The results of the investigation will be documented in a report to the Board of Directors in order to ensure a fair process is utilized in determining whether a violation of this Code has occurred. No person expressing concerns or complaints will be subject to any disciplinary or other adverse action by the Corporation absent a knowingly false report. All concerns or complaints may be made anonymously and will remain confidential to the extent practicable under the circumstances and in accordance with the legal obligations of the Company. More specific guidance can be found in the **Whistleblower Policy** maintained on SharePoint, the Bank's Intranet site. Please provide sufficient information to allow for a proper investigation of your concerns. The Corporation will retain a record of all concerns and complaints, and the results of its investigations, for five years. No one has the authority or right to order, direct, request or influence someone else to violate this Code. In addition, any retaliation or threat of retaliation against any employee, officer, or director for refusing to violate this policy or for reporting in good faith a violation or suspected violation, is in itself a violation of this Code, may be a violation of the law, and may result in disciplinary action, up to and including termination of employment.

Waiver of the Code

Any waiver of this Code of Conduct for executive officers or directors may only be made by the HomeTrust Bancshares, Inc. Board of Directors, and the waiver and the reasons for the waiver, as well as any change in this Code applicable to directors and executive officers (including the principal accounting officer) must be promptly filed and/or disclosed to the extent required by applicable laws, rules, regulations or stock exchange listing requirement. Any waiver of this Code for other personnel may be made by the Chief Administration Officer, Chief Executive Officer, or Chief Financial Officer and properly documented as required. Any written documentation will be filed in the employee's personnel file.

Dissemination of Information

All directors, officers and employees will be provided a copy of this document. A copy will be provided to new employees at time of employment. This document is also available on SharePoint, the Bank's Intranet site. Each director, officer and employee is expected to stay familiar with the standards outlined in this Code and will be asked annually to confirm their commitment to complying with all provisions of this Code by signing a receipt acknowledgement. Documentation of initial and annual acknowledgements will be maintained in the Human Resources department.