

IBC Bancorp, Inc.

Excessive and Luxury Expenditure Policy

This policy fulfills the requirements under the Emergency Economic Stabilization Act of 2009 (“EESA”), as amended by the American Recovery and Reinvestment Act of 2009 (“ARRA”) enacted February 17, 2009. EESA requires each recipient of funds under the Capital Purchase Program (“CPP”) of the Troubled Assets Relief Program (“TARP”) to have in place a company-wide policy regarding excessive or luxury expenditures as identified by the Secretary of the Department of the U.S. Treasury (“Treasury”). This Policy shall remain in effect during the time period for which Treasury owns any debt or equity securities of IBC Bancorp, Inc. (the “Company”) acquired under the CPP.

The company and its subsidiary bank, International Bank of Chicago, prohibit excessive or luxury expenditures on the following:

- Entertainment and events;
- Office or facility renovations;
- Aviation or other transportations;
- Other activities or events that are not reasonable expenditures for conference, staff development, reasonable performance incentives, or other similar measure conducted in the normal course of business operations of the Company and its subsidiaries.

Expenditures covered by this Policy must also conform to the Company’s and its subsidiaries’ Travel Policy. Accordingly, any expenditures identified above which would exceed the authorization limits set forth in the Travel Policy or any expenditures identified above not covered by the Travel Policy must be approved by the Company’s Chief Executive Officer or the Chief Financial Officer in advance.

All directors and employees of the Company and its subsidiaries are required to adhere to this Policy. Failure to obtain the necessary prior approval from the Chief Executive Officer or Chief Financial Officer shall result in the denial of expense reimbursement for any such expenditures requiring prior approval under this Policy. Any Director or employee failing to adhere to this policy shall be subject to discipline. Any violation of this Policy shall be promptly reported to the Company’s Compliance Officer. The Compliance Officer is responsible for monitoring compliance with this Policy. At least annually, this Policy shall be reviewed and the Chief Executive Officer or the Chief Financial Officer shall certify that the requisite approvals under this Policy were properly obtained with respect to the expenditures identified above.

This Policy, and any amendments hereto, shall be posted on the Company’s website and provided to the Treasury and the Company’s primary federal regulator.