

METROPOLITAN BANK GROUP, INC.
LUXURY EXPENDITURE POLICY

This policy fulfills the requirements under the American Recovery and Reinvestment Act of 2009 (ARRA) enacted February 17, 2009. ARRA 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.

Metropolitan Bank Group, Inc. (Company) and its subsidiaries, prohibit excessive or luxury expenditures on entertainment and events, office or facility renovations, aviation or other transportation services or other activities or events that are not reasonable expenditures for conferences, staff development, reasonable performance incentives or other similar measures conducted in the normal course of business operations of Metropolitan Bank Group, Inc.

Renovations:

Renovations of facilities and office spaces should be tracked within the capital expenditure policy of the Company and kept to a minimum. An exception to this can be allowed if management must deal with an emergency situation, such as an act of nature, and the expenditure is necessary to make the facility operational for customer use.

At no time should renovations be done that would have the appearance of being extraordinary or excessive from a shareholder perspective.

Entertainment:

Entertainment is defined as an activity that an Employee or Executive would use corporate funds for business development purposes relating to a current customer(s) or prospective customer(s) or to further enhance the Company's marketing efforts.

Our expectation is that all expenses incurred by the Bank would be for company purposes, and used to drive business to the Bank. Occasional events such as taking customers or prospects on trips, playing golf, eating dinner, taking them to other events the customer/ prospect would find pleasurable is a necessary part of the Company's marketing efforts and is not deemed are deemed to be business expenses and not a violation of the Luxury Policy. These expenses should be documented and detailed as to the benefit derived by the Bank.

Conferences:

We encourage our staff to attend conferences that are appropriate educational opportunities. These conferences should be related to the financial services industry and have a direct correlation to their job. At times it may be appropriate that a spouse would

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travel to these conferences with Company attendees. Typically these conferences are sponsored by vendors, banking associations, or other industry related entities.

This Policy would EXCLUDE reward conferences whether paid for by the Company or other vendors if the purpose is meant to be a reward, or would have no value of education to the employee or executive.

Holiday Parties:

We feel that holiday parties are part of an employee appreciation process. Holiday parties should be local in geographic nature, and should not cost the Company more than an average day's payroll per employee, on average, which is approximately \$15,000 per company within Metropolitan Bank Group, Inc.

Board Retreats should only be used for educational purposes, and should be kept reasonable and looked at in the same manner and discretion as all other expenses. Board education is a vital part of maintaining and keeping a dynamic director base, and this policy should not limit the retreat that is focused on strategic planning or education.

Events and Parties focused on Customers for the purpose of attracting their business would not fall under this policy.

Aviation Services:

Transportation for Company staff to outlying locations, including conferences, business development purposes and merger and acquisition research, should be conducted in the most cost appropriate way for the Company. The accounting department will maintain, when appropriate, an analysis of trips to determine which mode of transportation is the most appropriate for the Company and its Shareholders. Modes of transportation to be used for the analysis, for example, may consist of vehicle, commercial air service and private air service. A determination of transportation analysis will factor in cost, efficiency and timeliness of travel.

Applicability and Administration:

ALL employees of the Company, not just executives, are subject to and will be accountable for compliance with this Policy. The Company's Vendor Management and Accounts Payable area (Headed up by the VP, Vendor Management and the Deputy CFO respectively,) will be primarily responsible for review of this Policy and the reporting of all violations to the CEO and or CFO and/or the Board of Directors of the Company. This includes spouse travel to conferences or sponsored events. To further enhance compliance with the Policy, employees are also able to report suspected violations of the Policy to the VP, Vendor Management and/or Deputy Chief CFO.
