Corporate Statement

A financial institution’s activities are affected by laws and regulations, as well as its responsibilities to its shareholders, customers, employees and the community in which it serves. T Bancshares' (the Company’s) Code of Conduct provides the avenue for ensuring that the conduct of its employees is consistent with the institution’s corporate responsibilities.

This Code sets out the basic standards of ethics and conduct to which all of our directors, officers and employees are held. These standards are designed to deter wrongdoing and to promote honest and ethical conduct, but will not cover all situations. If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code.

If you have doubts as to the propriety of a particular situation, you should bring it to the attention of the Company’s Compliance Officer, who will review the situation and take appropriate action based on this Code, the Company’s other corporate policies and the applicable law.

If your concern relates to the Compliance Officer, you should bring the matter to the attention of the Chairman of the Audit Committee of the Company. The contact information for each of those individuals is included at the end of this policy.

The Company intends to vigorously enforce the provisions of this Code. Violations may lead to disciplinary action, up to and including termination of employment, and may have other legal consequences. Employee performance evaluations and incentive or bonus compensation may be impacted by violations of this code.

Scope

Directors, officers, and employee’s (including temporary employees or independent contractors) of the Company are subject to this Code.

Honest and Ethical Conduct

The Company’s reputation for integrity is its most valuable asset and is directly affected by the conduct of its employees. T Bancshares requires honest and ethical conduct from all directors, officers, and employees. All individuals subject to this Code have a responsibility to all other directors, officers and employees of the Company, and to the Company itself, to act in good faith, responsibly and with due care, competence and diligence.

Compliance with Laws, Rules and Regulations

Directors, officers, and employees are required to comply with all applicable governmental laws, rules and regulations, both in letter and in spirit. Although directors, officers, and employees are not expected to know the details of all the applicable laws, rules and regulations, the Company expects individuals to seek proper advice regarding requirements applying to a particular situation or engage appropriate conduct that may be required to comply with any law, rule or regulation.

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Conflicts of Interest
Directors, officers, and employees must handle in an ethical manner any actual or apparent conflict of interest between personal and business relationships. A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the Company. Directors, officers, and employees must not use their position for private gain, to advance personal interests, or to obtain favors or benefits for themselves, members of their families, or any other individuals, corporations or business entities.

Directors, officers, and employees are expected to promptly report all conflicts of interest to the Company’s Compliance Officer or Audit Committee Chairman.

Conflicts of interest are prohibited as a matter of Company policy, except under guidelines approved by the Board of Directors. The following standards apply to certain common situations where potential conflicts of interest may arise:

- **Gifts and Entertainment**
  Consistent with applicable law, personal gifts and entertainment offered by persons doing business with the Company may be accepted when offered in the ordinary and normal course of the business relationship. However, the frequency and cost of any such gifts or entertainment may not be so excessive that the ability to exercise independent judgment on behalf of the Company is or may appear to be compromised.

- **Financial Interests in Other Organizations**
  The determination whether any outside investment, financial arrangement or other interest in another organization is improper depends on the facts and circumstances of each case. Ownership of an interest in another organization may be inappropriate if the other organization has a material business relationship with, or is a direct competitor of, the Company and the financial interest is of such a size that the ability to exercise independent judgment on behalf of the Company is or may appear to be compromised. As a general rule, a passive investment would not likely be considered improper if it: (1) is in publicly traded shares; (2) represents less than 1% of the outstanding equity of the organization in question; and (3) represents less than 5% of an individual’s net worth. Other interests also may not be improper, depending on the circumstances.

- **Outside Business Activities**
  The determination of whether any outside position an officer or employee may hold is improper will depend on the facts and circumstances of each case. Involvement in trade associations, professional societies, and charitable and similar organizations will not normally be viewed as improper. However, if those activities are likely to take substantial time from or otherwise conflict with responsibilities to the Company, an officer or employee must obtain prior approval from senior management. Other outside associations or activities are likely to be viewed as compromising if they interfere with an officer’s or employee’s ability to devote proper time and attention to their responsibilities to the Company or if involvement is with another Company with which the Company does business or competes.
For a director, employment or affiliation with a Company with which the Company does business or competes must be fully disclosed to the Company’s Board of Directors and must satisfy any other standards established by applicable law, rule (including rule of any applicable stock exchange) or regulation and any other corporate governance guidelines that the Company may establish.

- **Indirect Violations**
  Directors, officers, and employees should not indirectly, through a spouse, family member, affiliate, friend, partner, or associate, have any interest or engage in any activity that would violate this Code. Any such relationship should be fully disclosed to the Company’s Compliance Officer (or the Board of Directors if you are a director of the Company), who will make a determination whether the relationship is inappropriate, based upon the standards set forth in this Code.

**Corporate Opportunities**
Officers and employees are prohibited from taking for personal benefit opportunities that are discovered through the use of corporate property, information or position, unless the Board of Directors has declined after full disclosure of all relevant facts to pursue the opportunity. Officers and employees may not use corporate property, information, or position for personal gain, or to compete with the Company directly.

**Fair Dealing**
Directors, officers, and employees should endeavor to deal fairly with the Company’s suppliers, competitors and employees and with other persons with whom the Company does business. Consistent with the Company’s ethical standards, practices taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice will not be tolerated.

**Public and Financial Reporting Responsibilities**
As a public reporting Company, it is critically important that the Company’s filings with the Securities and Exchange Commission are accurate and timely. Directors, officers, and employees are expected to comply with all laws, statutes, rules, regulations, and stock exchange listing standards, to the extent applicable to the conduct of their duties and responsibilities.

**Confidentiality**
Directors, officers, and employees are expected to respect and maintain the confidentiality of all confidential information entrusted to you by the Company or by persons with whom the Company does business, except when disclosure is authorized or legally mandated. Confidential information includes all nonpublic information that might be of use to competitors of, or harmful to, the Company or persons with whom the Company does business.

**Insider Trading**
Directors, officers, and employees with access to material, non-public information concerning the Company are not permitted to use or share that information for stock trading purposes, or for any other purpose except in the conduct of the Company’s business. All non-public information about the Company should be considered confidential information. Insider trading, which is the use of

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material, non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical, but also illegal. The prohibition on insider trading applies not only to the Company’s securities, but also to securities of other companies if you learn of material non-public information about these companies in the course of your duties to the Company. Violations of this prohibition against “insider trading” may subject you to criminal or civil liability, in addition to disciplinary action by the Company up to and including termination of employment.

**Protection and Proper Use of Company Assets**

Directors, officers, and employees have a duty to protect the Company’s assets and promote their efficient use. All corporate assets should be used for legitimate business purposes. The obligation of directors, officers, and employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information violates Company policy and may lead to disciplinary action, up to and including termination of employment, and if determined to be illegal could result in civil or even criminal penalties.

**Interpretations and Waivers of the Code of Business Conduct and Ethics**

Directors, officers, and employees uncertain as to whether a particular activity or relationship is improper under this Code or who requires a waiver of this Code, should disclose it to the Company's Compliance Officer (or the Board of Directors if you are a director), who will make a determination first, whether a waiver of this Code is required and second, if required, whether a waiver will be granted. Agreements, restrictions, or conditions may be required before a waiver or a continuing waiver is granted. However, any waiver of this Code for an executive officer or director may be made only by the Company’s Board of Directors and will be promptly disclosed to the extent required by applicable law, rule (including any rule of any applicable stock exchange) or regulation.

**Reporting any Illegal or Unethical Behavior**

Directors, officers, and employees are encouraged to talk to the Compliance Officer when in doubt about the best course of action in a particular situation. Additionally, officers and employees should promptly report violations of laws, rules, regulations or this Code to the Company's Compliance Officer or Audit Committee Chairman. Any report or allegation of a violation of applicable laws, rules, regulations or this Code need not be signed and may be sent anonymously. All reports of violations of this Code, including reports sent anonymously, will be promptly investigated and acted upon in a timely manner. If any report of wrongdoing relates to accounting or financial reporting matters, or relates to persons involved in the development or implementation of the Company's system of internal controls, a copy of the report will be promptly provided to the chairman of the Audit Committee of the Board of Directors, who may participate in the investigation and resolution of the matter. It is the policy of the Company not to allow actual or threatened retaliation, harassment or discrimination due to reports of misconduct by others made in good faith by officers and employees. Officers and employees are expected to cooperate in internal investigations of misconduct. Refer to the Company’s Whistleblower Policy for details on reporting illegal or unethical conduct and the protections the Company provides.

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Compliance Standards and Procedures

The names, addresses, telephone numbers, facsimile numbers and e-mail addresses of the Compliance Officer and the Audit Committee Chairman of the Company are set forth below:

T Bancshares, Inc.
16200 Dallas Parkway, Suite 190
Dallas, TX 75248
(972) 720-9000 Telephone
(972) 720-9025 Fax

Compliance Officer
Shari Jensen
(972) 720-9016
sjensen@tbank.com

Audit Committee Chairman
David Carstens
(972) 367-2001 x106 business
Carstens@cclaw.com

T Bancshares, Inc. reserves the right to modify or amend this policy at any time as it may deem necessary, including any modifications that may be required to comply with state or federal law and regulations, stock market or exchange rules and regulations where the Company’s stock may be listed, and/or to accommodate organizational changes.