

**SIDNEY FEDERAL SAVINGS AND LOAN ASSOCIATION
CODE OF ETHICS FOR SENIOR OFFICERS**

It is the policy of Sidney Federal Savings and Loan Association (the "Association") that the Association's Principal Executive Officer ("PEO"), Principal Financial Officer ("PFO") and Principal Accounting Officer/Controller (collectively referred to herein as the "Senior Officers") adhere to and advocate the following principles governing their professional and ethical conduct in the fulfillment of their responsibilities:

1. Act with honesty and integrity, avoiding actual or apparent conflicts between his or her personal, private interests and the interests of the Association, including receiving improper personal benefits as a result of his or her position.
2. Perform responsibilities with a view to causing periodic reports and other documents filed with the Office of the Comptroller of the Currency and other public communications to contain information that is full, fair, accurate, timely and understandable.
3. Comply with laws of federal, state, and local governments applicable to the Association, and the rules and regulations of private and public regulatory agencies having jurisdiction over the Association.
4. Promptly report violations or suspected violations of this Code of Ethics to the Chairman of the Audit Committee or, if a violation involves any member of the Audit Committee, to outside counsel.
5. Act in good faith, responsibly, with due care, and diligence, without misrepresenting or omitting material facts or allowing independent judgment to be compromised.
6. Respect the confidentiality of information acquired in the course of the performance of his or her responsibilities, except when authorized or otherwise legally obligated to disclose. Do not use confidential information acquired in the course of the performance of his or her responsibilities for personal advantage.
7. Proactively promote ethical behavior among subordinates and peers.
8. Use corporate assets and resources employed or entrusted in a responsible manner.
9. Not use corporate information, corporate assets, corporate opportunities or one's position with the Association for personal gain.
10. Not compete directly or indirectly with the Association.
11. Advance the Association's legitimate interests when the opportunity arises.

The Audit Committee of the Board of Directors shall have the power to monitor, make determinations, and recommend action to the Board with respect to violations of this Code of Ethics, with the intention of holding the persons governed by this Code of Ethics accountable for adherence hereto. Any waivers of this Code of Ethics may only be made by the Board of Directors and must be promptly disclosed to the Association's stockholders in accordance with applicable laws and regulations. Waivers should not be granted except under extraordinary or special circumstances. Amendments to this Code of Ethics may only be made by the Board of Directors and must be promptly disclosed to the Association's stockholders in accordance with applicable laws and regulations.

Adopted April 16th, 2019