

GUARANTY BANCORP, INC.

Excessive and Luxury Expenditure Policy

On February 17, 2009, the American Recovery and Reinvestment Act of 2009 (“ARRA”) was enacted. ARRA requires any recipient of funds in the Troubled Assets Relief Program’s Capital Purchase Program to, among other things, adopt a company-wide policy regarding “excessive” or “luxury” expenditures.

It is the Company’s policy that directors and employees of the Company and its subsidiary, Woodsville Guaranty Savings Bank, utilize corporate assets in a prudent and reasonable manner and as such are hereby precluded from engaging in excessive or luxury expenditures. Excessive or luxury expenditures can occur in the following areas:

- Entertainment;
- Meetings;
- Office and facility renovations;
- Air and other travel; and
- Holiday parties.

All such expenditures shall be reasonable and appropriate under the circumstances as determined by the Compensation Committee. Any expenditure in the above categories that is unreasonably high under the circumstances shall be considered extravagant. No director or employee shall engage in extravagant spending. Any employee who engages in extravagant spending shall be subject to discipline up to and including termination.

Compliance with this Policy shall be monitored by the Board of Directors.