

Code of Ethics Policy

All employees will adhere to and advocate the following principles governing their professional and ethical conduct.

1. Act with honesty and integrity, avoiding actual or apparent conflicts between his or her personal, private interests and the interests of the Company, including receiving improper personal benefits as a result of his or her position.
2. Comply with laws of federal, state, and local governments applicable to the Company and the rules and regulations of private and public regulatory agencies having jurisdiction over the Company.
3. Act in good faith, responsibly, with due care, and diligence, without misrepresenting or omitting material facts or allowing independent judgment to be compromised.
4. Maintain the confidentiality of information acquired in the course of the performance of his or her responsibilities.
5. Will not destroy, alter or falsify records. Tampering of records or impeding investigations is prohibited.
6. Proactively promote ethical behavior among peers and subordinates. No employee or member of his/her immediate family may directly or indirectly benefit personally from his/her position or connection as an employee, or from any sale or purchase or other activity of the Company. For example:
 - a) No employee or a member of his/her immediate family may seek or accept from or offer or provide to, directly or indirectly, any individual, or public or private organization, or governmental entity, or any representative of the foregoing, which is seeking or doing business with the Company, any services, payments, loans (except with banks or other financial institutions, and in compliance with law), excessive entertainment or travel, vacation or pleasure trips, gifts of more than nominal value or gifts of money at any amount.
 - b) No employee or member of his/her immediate family may have any interest, direct or indirect, in any organization which is seeking or doing business with the Company or which is a competitor of the Company, except when such interest comprises securities in a widely-held corporation which are traded regularly in recognized security markets, and such interest is not in excess of one percent (1%) of any class of securities of such corporation, or except when such interest has been fully disclosed to the President of the Company for a determination as to the substantiality of such interest and the propriety for retaining it.
 - c) No employee may serve as an officer, director, employee, or consultant of another company or organization which is a competitor of the Company or which is seeking or doing business with the Company, such employee may serve as a director of a corporation which is doing business with the

Company, where no competitive situation is present. Instances in which a member of an employee's immediate family serves as an officer, director, employee, or consultant of another company or organization which is a competitor of the company should be reported in writing to the employee's supervisor for recommendation to the President as to applicability to Company policy.

- d) No employee or member of his/her immediate family may, without proper authorization, use or permit others to use Company property or services for personal purposes.

In addition, Oritani Bank's parent company, Oritani Financial Corp., is a public company. All employees are prohibited from knowingly executing, or attempting to execute, a scheme or artifice to defraud any person in connection with any security of Oritani; or to obtain, by means of false or fraudulent pretenses, representations, or promises, any money or property in connection with the purchase or sale of any security of Oritani. Debts related to a judgment, fine, penalty, restitution obligation or settlement agreement concerning violations of any of the federal or state securities laws, regulations or orders; or fraud, deceit, or manipulation in connection with the purchase or sale of any security, are not dischargeable in bankruptcy.