

## STATEMENT OF CORPORATE POLICY CONCERNING WOMEN, MINORITIES, INDIVIDUALS WITH DISABILITIES AND PROTECTED VETERANS

It has been a long-standing policy of this Bank to employ and promote qualified personnel without discrimination against any employee or applicant for employment because he or she is a woman, minority, individual with a disability or a protected veteran.

Our policy is to recruit, hire, train, and promote persons in all job titles, and to ensure that all other personnel actions are administered without regard to age, color, sex (including pregnancy), gender identity or expression, marital or familial status, genetic information, national origin, ancestry, citizenship status, physical or mental disability, race, creed, religion, sexual orientation, military or veteran status or any legally protected characteristic, and to ensure that all employment decisions are based only on merit and valid job requirements. In support of this commitment to equal opportunity, the Bank has adopted an Affirmative Action Program, which provides for an audit and reporting system, and developed detailed Affirmative Action and Equal Employment Opportunity and Workplace Discrimination and Harassment Policies. Together, these set forth the Bank's policies, practices and procedures with regard to non-discrimination and affirmative action for qualified women, minorities, individuals with disabilities and protected veterans.

All applicants or employees who are disabled or are protected veterans who wish to be included in our affirmative action program are invited to self-identify as such with the Bank's Officer for Affirmative Action. Such information is voluntarily provided, is kept confidential, and will not subject the person to any adverse treatment. In addition, the Bank will also provide reasonable accommodations to otherwise qualified employees with known disabilities, absent undue hardship. Likewise, we will provide reasonable accommodations to employment candidates during the application process, absent undue hardship.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance evaluation, hearing, or other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), Section 503 of the Rehabilitation Act of 1974, as amended (the Rehabilitation Act) or any other Federal, state or local law requiring equal opportunity for individuals with disabilities or protected veterans; (3) opposed any act or practice made unlawful by VEVRAA, the Rehabilitation Act or their respective implementing regulations or any other Federal, state or local law requiring equal opportunity for individuals with disabilities or protected veterans; (4) or exercised any right protected by VEVRAA, the Rehabilitation Act or their respective implementing regulations.

To ensure the effectiveness of the affirmative action program, the Bank has appointed Anthony G. Denniston, Executive Vice President - Chief HR Officer, as the Officer for affirmative action for individuals with disabilities or protected veterans. A copy of this affirmative action plan may be inspected during normal business hours by contacting him at 203.714.8813.

David J. Rotatori President & CEO

David Rotator

Dated 3/11/19