



STATEMENT OF CORPORATE POLICY CONCERNING
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 of a physical or mental disability or veteran status.

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 disability or protected veteran status, and to ensure that all employment decisions are based only on valid job requirements. Our Affirmative Action Program provides for an audit and reporting system.

From time to time, the Bank studies existing physical barriers and safety hazards to veterans and disabled individuals so that we may make reasonable accommodation to physical and mental limitations of employees and applicants, consistent with required job qualifications and the effective operation of the business.

All applicants or employees who are disabled, or are protected veterans, and who wish to benefit from the program are invited to identify themselves to the Bank. Such information is voluntarily provided, is kept confidential, and will not subject the person to any adverse treatment. 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) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, other protected veterans or Armed Forces service medal veterans; (3) opposed any act or practice made unlawful by VEVRAA or its implementing regulations in this part or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, other protected veterans or Armed Forces service medal veterans; (4) or exercised any right protected by VEVRAA or its implementing regulations.

To ensure the effectiveness of this affirmative action program, the Bank has appointed Kathleen A. McPadden, Vice President of Human Resources/Training, as the Officer for affirmative action for individuals with disabilities, disabled veterans, and covered veterans. A copy of this affirmative action plan may be inspected during normal business hours by contacting her at 203.729.4442.

Charles J. Boulter, III, President & CEO

A handwritten signature in black ink, appearing to read "Charles J. Boulter, III". The signature is written in a cursive style with a long horizontal stroke at the end.

10/1/2013