



**January 5, 2017**

**To: All employees and applicants for employment**

**Subject: EEO policy & availability of AAP for inspection**

It is the policy of Axiom Bank to provide equal employment opportunities without regard to race, color, religion, gender, gender identity, national origin, age, disability, marital status, protected veteran status, sexual orientation, genetic information, compensation discussions or disclosures or any other protected characteristic under applicable law. This policy relates to all phases of employment, including, but not limited to, recruiting, employment, placement, promotion, transfer, demotion, reduction of workforce and termination, rates of pay or other forms of compensation, selection for training, the use of all facilities, and participation in all company-sponsored employee activities. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity or age limitations will be adhered to by the company where appropriate.

As part of the company's equal employment opportunity policy, Axiom Bank will also take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces service medal veterans, and qualified disabled persons are introduced into our workforce and considered for promotional opportunities.

Employees and applicants shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

The above-mentioned policies shall be periodically brought to the attention of supervisors and shall be appropriately administered. It is the responsibility of each supervisor of the company to ensure affirmative implementation of these policies to avoid any discrimination in employment. All employees are expected to recognize these policies and cooperate with their implementation. Violation of these policies is a disciplinary offense.

In compliance with the Executive Order 11246, as amended, Section 503, of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended 38 U.S.C. 4212, we have developed written Affirmative Action Programs (AAP's), which contain all the steps we will undertake to ensure compliance with the above mentioned laws and with our "Equal Employment Opportunity and Affirmative Action Policies". The Veteran and Disabled Affirmative Action Program is available, for inspection, to any employee and applicant for employment upon request at the Human Resources Department during normal business hours, from Monday to Thursday.

The Affirmative Action Officer has been assigned to direct the establishment and monitor the implementation of personnel procedures to guide our affirmative action program throughout Axiom Bank. A notice explaining the company's policy will remain posted.

Daniel Davis,  
President & Chief Executive Officer