

AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY POLICY

First Columbia Bank & Trust Co. reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

First Columbia Bank & Trust Co. has developed and maintained a written Affirmative Action Program (AAP). The Company's Chief Executive Officer supports the affirmative action program and urges each employee to commit to carrying out the intent of this policy. First Columbia Bank & Trust Co. maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates. The EEO Administrator oversees the affirmative action plan development, modification, implementation, effectiveness, reporting requirements and conducts management updates. First Columbia Bank & Trust Co. invites any applicant and/or employee to review the Company's written Affirmative Action Plan. This plan is available for inspection upon request during normal business hours at the Human Resources office.

As part of First Columbia Bank & Trust Co.'s commitment to this overall process, it will ensure all aspects of employment, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes remain free of illegal discrimination based upon race, color, religion, sex, sexual orientation, gender identity, national origin, disability (as defined under Section 503 of the Rehabilitation Act of 1973), protected veteran status (as defined under Vietnam Era Veterans' Readjustment Assistance Act of 1974), or a person's relationship or association with a protected veteran, including spouses and other family members. First Columbia Bank & Trust Co. ensures all employment decisions are based only on valid job requirements. Regular review helps ensure compliance with this policy.

First Columbia Bank & Trust Co. will ensure that employees and applicants shall not be subjected to harassment due to their status described above, or any harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities; (1) filing a complaint with the Company or with federal, state, or local agencies regarding status covered under this AAP, (2) assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute pertaining to the status covered under this AAP; (3) opposing any act or practice made unlawful by section 503 and/or VEVRAA, and (4) exercising any other right protected by section 503 and/or VEVRAA or its implementing regulations in this part.