

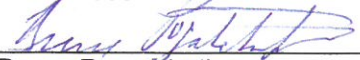
**FINLAYSON BANCSHARES
EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**

It is the policy of FINLAYSON BANCSHARES not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereafter referred collectively as "protected veterans." It is also the policy of FINLAYSON BANCSHARES to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the company will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

FINLAYSON BANCSHARES prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. FINLAYSON BANCSHARES also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As Vice President of Finlayson Bancshares of FINLAYSON BANCSHARES, I am committed to the principles of affirmative action and equal employment opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected Janelle Korpi as the Director of Human Resources for FINLAYSON BANCSHARES. One of the Director of Human Resources's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of FINLAYSON BANCSHARES's programs.

In furtherance of FINLAYSON BANCSHARES's policy regarding affirmative action and equal employment opportunity, FINLAYSON BANCSHARES has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that FINLAYSON BANCSHARES is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request between 8:30am - 4:00pm at the Human Resources department. Any questions should be directed to me, your supervisor, or Janelle Korpi, Director of Human Resources.



Bruce Pogatchnik
Vice President of Finlayson Bancshares
FINLAYSON BANCSHARES
07/01/2016