Equal Employment Opportunity and Non-Discrimination Statement of Policy
41 C.F.R. 60-741.44(a)

It is the policy of CCFBank National Association not to discriminate or allow the harassment of employees or applicants on the basis of physical or mental disability or any other characteristic protected by law with regard to any employment practices, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination, wage and benefit administration, and selection for training or other employment opportunities, provided the individual is qualified, with or without reasonable accommodation, to perform the essential functions of the job. This policy applies to all jobs at the Company. The Company will continue to ensure individuals are employed, and employees are treated during employment, without regard to their physical or mental disability any other characteristic protected by law in all employment practices as follows.

Employment decisions at the Company are based on legitimate job-related criteria. All personnel actions or programs that affect qualified individuals, such as employment, promotion, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination because of any basis protected by law. Employees may choose to voluntarily disclose their disability at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The Company makes, and will continue to make, reasonable accommodation to the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities, unless such accommodation would impose an undue hardship on the operations of the Company.

CCFBank National Association and its President & CEO are fully committed to the principles of equal employment opportunity and non-discrimination and support the successful implementation of the Company's Non-Discrimination Programs. Ali Bell, Non-Discrimination Officer for the Company, has been appointed with responsibility for implementation of the Company's non-discrimination activities. The Non-Discrimination Officer has the full support of top management to fully implement this Program. All managers and supervisors will take an active part in the Company's Non-Discrimination Program to ensure all qualified employees and prospective employees are treated in a non-discriminatory manner with respect to all employment decisions. Furthermore, CCFBank National Association will solicit the cooperation and support of all employees for the Company's Equal Employment Opportunity Non-Discrimination Policy.

The Company’s Non-Discrimination Program includes an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of the Program. The Non-Discrimination Officer has been assigned responsibility for periodically reviewing progress with compliance and implementation of the Company’s Non-Discrimination Policy. In accordance with public law, the Company's Non-Discrimination Program for qualified individuals with disabilities is available for inspection in the Human Resources Department, 9:00 a.m. to 5:00 p.m. upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint,

assisting or participating in an investigation, compliance review hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, or any other federal, state or local law or regulation regarding equal employment opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations.

Ali Bell

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Ali Bell
SVP Human Resources
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