

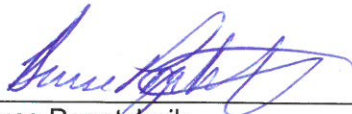
**FINLAYSON BANCSHARES
EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**

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, or 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.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) Filing a complaint; (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other Federal, State or local law requiring equal opportunity for individuals with disabilities; (3) Opposing any act or practice made unlawful by section 503 or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons; or (4) Exercising any other right protected by section 503 or its implementing regulations in this part.

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 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 Affirmative Action Program is available for inspection by any employee or applicant for employment upon request between 8:30am - 5:00pm at the Human Resources department. Any questions should be directed to me, your supervisor, or Janelle Korpi, Director of Human Resources.



Bruce Pogatchnik
FINLAYSON BANCSHARES
07/01/2015