

POLICY STATEMENT

Mabrey Bank is an equal employment opportunity employer and is committed to a proactive program of affirmative action and diversity development. Mabrey Bank will continue to recruit, hire, train, and promote into all job levels without regard to race, religion, gender, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, source of income, or protected veteran status.


Accordingly, all personnel actions, such as compensation, benefits, transfers, social and recreational programs, etc. will be administered without regard race, religion, gender, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, source of income, or protected veteran status or any other basis prohibited by applicable law.

It is the policy of Mabrey Bank that every employee has the right to work in an environment where each individual is treated with respect and dignity. Consistent with this policy Mabrey Bank is committed to maintaining a work environment that is free of bias, prejudice and harassment.

Mabrey Bank will not discharge or in any other manner discriminate against any employee or applicant for employment because such employee or applicant has inquired about, discussed, or disclosed the compensation of the employee or applicant or another employee or applicant. This provision shall not apply to instances in which an employee who has access to the compensation information of other employees or applicants as a part of such employee's essential job functions discloses the compensation of such other employees or applicants to individuals who do not otherwise have access to such information, unless such disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Mabrey Bank, or is consistent with Mabrey Bank's legal duty to furnish information.

Consistent with this policy, it is Mabrey Bank practice to prohibit illegal workplace harassment and discrimination. This prohibition includes forms of harassment that violate state and federal laws, and forms of harassment that may not violate law, but which violate Mabrey Bank Human Resources policies because they are not conducive to creating a respectful work environment for employees.

To assure compliance with the plan, Kendall Mullen, Director of Human Resources has been designated to administer and monitor the plan and make reports to W. Carlisle Mabrey, III. The Affirmative Action Plan is available for inspection in accordance with applicable regulations.


Kendall Mullen
Director of Human Resources, Sr. Vice President
Mabrey Bank
August 1, 2018

**EQUAL EMPLOYMENT OPPORTUNITY FOR QUALIFIED INDIVIDUALS WITH
DISABILITIES AND QUALIFIED PROTECTED VETERANS
POLICY STATEMENT**

It is the policy of Mabrey Bank not to discriminate against any employee or applicant for employment because he or she is a qualified individual with a disability, a disabled veteran, a recently separated veteran, other protected veteran, or Armed Forces service medal veteran (i.e., qualified protected veterans) in regard to any position for which the employee or applicant for employment is qualified.

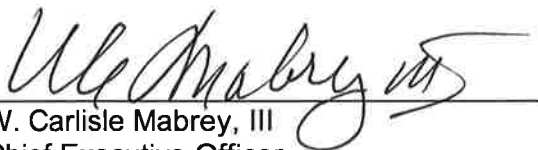
It is also the policy of Mabrey Bank to take affirmative action to employ and to advance in employment, all persons regardless of their status as qualified individuals with disabilities or qualified protected veterans, and to base all employment decisions only on valid job requirements. This policy shall 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 of and applicants to Mabrey Bank will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans.

As CEO of Mabrey Bank, 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 the Director of Human Resources as the Equal Employment Opportunity (EEO) Manager for Mabrey Bank. One of the EEO Manager's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Mabrey Bank's programs.

In furtherance of Mabrey Bank's policy regarding Affirmative Action and Equal Employment Opportunity, Mabrey Bank has developed a written Affirmative Action Program which sets forth the policies, practices and procedures which Mabrey Bank is committed to applying in order to ensure that its policy of non-discrimination 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, during normal business hours, in the Human Resources Department. Interested persons should contact the EEO Manager at (918) 366-4000 for assistance.



W. Carlisle Mabrey, III
Chief Executive Officer
Mabrey Bank
August 1, 2018



Kendall Mullen
Director of Human Resources, SVP
Mabrey Bank
August 1, 2018