



Broadway National Bank

Equal Employment Opportunity Policy

Broadway National Bank is committed to providing equal employment opportunity to all qualified employees and applicants. Employment decisions are made without regard to race, color, sex, sexual orientation, gender identity, religion, national origin, disability, veteran status, age, marital status, pregnancy, genetic information, or any other status protected by applicable federal, state, or local law. Where required, Broadway National Bank will take affirmative action to ensure this policy is fully implemented. This commitment to fair, merit-based employment practices applies to all aspects of employment, including but not limited to:

- Recruitment, hiring, promotion, transfer, demotion, layoff, termination, and training
- Treatment during employment
- Compensation, benefits, and other terms and conditions of employment
- Selection for training, including apprenticeship and on-the-job training programs, as applicable
- Participation in social and recreational activities or programs

This policy is consistent with the requirements of Section 503 of the Rehabilitation Act of 1973, as amended; the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended; and all other applicable federal, state, or local laws. In addition, Broadway National Bank does not and will not discriminate against any employee or applicant on any of the aforementioned bases for any position for which the individual is qualified.

Broadway National Bank also prohibits discrimination based on an individual's relationship or association with a protected veteran, including spouses and other family members. The company is committed to ensuring fair and equitable treatment in all employment actions and strictly prohibits harassment of applicants or employees based on their relationship or association with a protected veteran.

The chief U.S. executive of Broadway National Bank, David Bohne, fully supports and is committed to the principles of equal employment opportunity and affirmative action.

Broadway National Bank seeks to employ individuals who meet job-related qualifications in terms of education, training, experience, and other valid criteria, or who can be trained to meet those qualifications. The company will make reasonable accommodations for qualified individuals with disabilities and disabled veterans unless such accommodations would impose an undue hardship or pose a direct threat to business operations.

Harassment of any employee, applicant, or other person on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status, age, marital status, pregnancy, genetic information, or any other legally protected characteristic is illegal and strictly against Broadway National Bank's policy. All employees, supervisors, managers, and contractors are expected to comply with this policy.

Employees and applicants are protected from harassment, intimidation, or retaliation for engaging in any of the following:

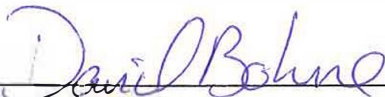
- Filing a complaint of discrimination or harassment
- Assisting or participating in an investigation, compliance review, hearing, or other related activity
- Opposing any unlawful practice under federal, state, or local EEO laws
- Exercising any legal right protected by equal opportunity laws

Broadway National Bank will not discharge or otherwise discriminate against employees or applicants for inquiring about, discussing, or disclosing their own compensation or the compensation of another employee or applicant. However, employees who have access to compensation information as part of their job functions may not disclose such information to others who do not have authorized access, unless the disclosure is:

- (a) in response to a formal complaint or charge;
- (b) in furtherance of an investigation, proceeding, hearing, or legal action; or
- (c) otherwise consistent with the contractor's legal duty to provide such information.

In compliance with Section 503 and VEVRAA, and their implementing regulations, and applicable state or local laws, Broadway National Bank's Affirmative Action Programs are reviewed and updated annually based on workforce changes, availability data, goal adjustments, and changes in applicable laws or regulations. These programs are available for review by any employee or applicant upon request to a Human Resources representative during regular business hours (8:30 a.m. to 4:30 p.m.).

Gabrielle Perales has been designated as the Equal Employment Opportunity Coordinator. This individual is responsible, with support from management, for developing and implementing affirmative action and nondiscrimination efforts, monitoring progress, identifying problem areas, and taking appropriate corrective actions. The EEO Coordinator is also responsible for ensuring timely and accurate reporting in accordance with applicable federal, state, and local laws. All management personnel are accountable for supporting the company's EEO and affirmative action objectives.



David Bohne, Chief Executive Office