

# **Ixonia Bank**

## **Equal Employment Opportunity Affirmative Action Policy Statement**

**February 23, 2022**

This policy applies to both the Ixonia Bank Division and the Novus Home Mortgage Division, unless otherwise noted and highlighted in this policy.

It is the policy of Ixonia Bank not to discriminate against any employee or applicant for employment on the basis of their race, color, religion, sex, age, national origin, disability, military and protected Veteran Status, recently separated veterans, sexual orientation, genetic information, marital status, gender identity or any other characteristic protected by state and federal law. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, training, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training at all levels of employment.

Ixonia Bank operates in several states throughout the U.S. State law may require additional protected characteristics; please check the Equal Employment Opportunity section in the state addendum that aligns with the employee's work location. Ixonia Bank is committed to following any additional state requirements regarding this topic. Ixonia Bank is very committed to Equal Employment Opportunity and Affirmative Action in all aspects of its business and will utilize affirmative action to make employment decisions so as to further the principle of equal employment opportunity. Personnel decisions are based only on valid job requirements, and we will make all reasonable accommodations necessary to employ and advance in employment- qualified persons with disabilities, newly separated veterans, protected veterans, and disabled veterans.

Employees of and applicants to Ixonia 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 disability or qualified protected veterans.

If you would like to review our Affirmative Action Plan for veterans and individuals with disabilities, please contact the SVP of Human Resources during normal business hours.

As the Chairman and Chief Executive Officer of Ixonia Bank, I wish to add my personal note of commitment to assuring that our organization carries out our Equal Employment Opportunity policy and fulfills the obligations of our Affirmative Action Plan. I expect the support of all employees in attaining and maintaining our goals for a workplace free of discrimination. Equal employment opportunity is not accomplished at the expense of any group or individual, but rather it is good business practice, and it contributes to an organization enriched by diversity and excellence.

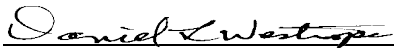
Ixonía Bank will provide reasonable accommodations to a qualified individual with a disability, as defined by ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact Human Resources. All requests for ADA reasonable accommodations are to be submitted to Human Resources and your Supervisor, and will be considered.

Upon receipt of an Accommodation Request form, Human Resources and your Supervisor will meet with you to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Ixonía Bank might make to help overcome those limitations. Ixonía Bank will determine the feasibility of the requested accommodations, considering various factors, including, but not limited to the nature and the cost of the accommodation, and the impact on the operation of the Company, including its impact on the ability of other employees to perform their duties and on Ixonía Bank's ability to conduct business.

Human Resources will inform the employee of its decision on the accommodation request or on how to make the accommodation. If the accommodation request is denied, the employee will be advised of their right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request on appeal is denied, that decision is final.

The ADA does not require Ixonía Bank to make the best possible accommodation, to reallocate essential job functions, or to provide personal use of items. An employee or a job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify Human Resources. All such inquiries or complaints will be treated as confidential to the extent permissible by law. Ixonía Bank is determined to be in full compliance with the provisions of the Law and of the Affirmative Action Program.



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Daniel L. Westrope