

FineMark National Bank & Trust
EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of FineMark National Bank and Trust ("FineMark") not to discriminate against any associate or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, 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 FineMark 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. Furthermore, the company will provide qualified applicants and associates requesting an accommodation due to a disability, with reasonable accommodations, as required by law.

FineMark National Bank & Trust prohibits harassment of associates and applicants because they are individuals with disabilities or protected veterans. FineMark also prohibits retaliation against associates and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As President & CEO of FineMark National Bank & Trust, I am committed to the principles of affirmative action and equal employment opportunity. I have selected Jennifer Stevens, EVP, Human Resources Director, to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company. In this position, she will have overall responsibility for establishing and maintaining an internal audit and reporting system to allow for effective measurement of the company's programs.

In furtherance of FineMark National Bank & Trust's policy regarding affirmative action and equal employment opportunity, FineMark has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that the company 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 FineMark associate or applicant for employment upon request between 8:00AM and 5:00PM at the Human Resources department. Any questions should be directed to me, Jennifer Stevens, EVP, Human Resources Director, or your manager.



Joseph Catti
President & CEO
FineMark National Bank & Trust
January 1, 2020