


**FineMark National Bank & Trust**  
**EQUAL EMPLOYMENT OPPORTUNITY (EEO) 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, FineMark will provide qualified applicants and associates who request an accommodation due to a disability with reasonable accommodations, as required by law.

FineMark National Bank and Trust prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. FineMark National Bank and Trust also prohibits retaliation against employees 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 Chairman & CEO of FineMark National Bank and Trust, I am committed to the principles of affirmative action and equal employment opportunity. To ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of FineMark, I have selected FineMark's Chief Human Resources Officer, Jennifer Stevens. One of the position's duties is to ensure an internal audit and reporting system is established and maintained to allow for effective measurement of FineMark's programs.

In furtherance of FineMark'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 FineMark is committed to in order to ensure its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any associate or applicant for employment upon request between 8:00am to 5:00pm in the Human Resources department. Any questions should be directed to me, your manager, or Jennifer Stevens, EVP, Chief Human Resources Officer.

  
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Joseph Catti  
Chairman & CEO  
FineMark National Bank and Trust  
January 1, 2022