

## CHAPTER A: POLICY STATEMENT

### 41 C.F.R. §§ 60-300.44(a); 60-741.44(a)

It is the policy of CAPITAL CREDIT UNION and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, status as a protected veteran or individual with a disability at all levels of employment, including the executive level. CAPITAL CREDIT UNION does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, sexual orientation, gender identity, age, status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, CAPITAL CREDIT UNION is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. CAPITAL CREDIT UNION will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:

- (1) Filing a complaint;
- (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;
- (3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or
- (4) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

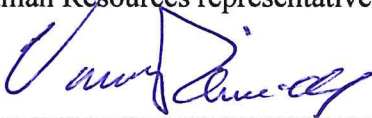
Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job

opportunities to all persons regardless of race, religion, color, national origin, sex, sexual orientation, gender identity, age, status as a protected veteran or an individual with disability. CAPITAL CREDIT UNION's EEO policy and affirmative action obligations include the full support from CEO, Vance Reinbold.

CAPITAL CREDIT UNION will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in company-sponsored activities were extended to all employees and applicants.

The CAPITAL CREDIT UNION is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. The CAPITAL CREDIT UNION's employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the CAPITAL CREDIT UNION's legal duty to furnish the information.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact a Human Resources representative. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with a Human Resources representative.



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(Signature)

Vance Reinbold  
CEO

July 2019