



EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of Hudson Heritage Federal Credit Union ("Hudson Heritage") not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, national origin, disability, or because he or she is a disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran (collectively, "protected veterans"), or any other characteristics protected under applicable law. It is also the policy of Hudson Heritage 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.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of 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 Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other Federal, State or local law requiring equal opportunity for individuals with disabilities; (3) Opposing any act or practice made unlawful by Section 503 or its implementing regulations in this part, or any other Federal, State or local law requiring equal opportunity for disabled persons; or (4) Exercising any other right protected by section 503 or its implementing regulations in this part. Further, Hudson Heritage 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.

As President/CEO of Hudson Heritage, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected Arlette Grosso as the HR Supervisor for Hudson Heritage. One of the HR Supervisor's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Hudson Heritage's programs.

In furtherance of Hudson Heritage's policy regarding Affirmative Action and Equal Employment Opportunity, Hudson Heritage has developed a written Affirmative Action Program which sets forth the policies, practices and procedures that Hudson Heritage 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 employee or applicant for employment upon request between normal business hours at the Human Resources department. Any questions should be directed to me, your supervisor, or Arlette Grosso, HR Supervisor.

A handwritten signature in black ink that reads "Michael Ciriello".

Michael Ciriello, President/CEO
Hudson Heritage Federal Credit Union
March 1, 2019