



**WESTFIELD
BANK**

EEO Policy

Review Date:	March 2020
Board Approval Date (when required):	April 2020
Effective Date:	April 2020
Supersedes Policy Dated:	April 2019
Party Responsible for Updating Policy:	Chief Administrative Officer

Equal Employment Opportunity (EEO) Policy

POLICY

Equal Employment Opportunity

It has been and shall continue to be both the official policy and the commitment of Westfield Bank, including all its affiliates, to provide equal employment opportunities for all persons and use affirmative action efforts to ensure that all persons are recruited, hired, trained, transferred and promoted in all job groups regardless of race, religion, color, national origin, ethnicity, citizenship, sex (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity, genetic information, age, military or veteran status, disability, or any other characteristic protected by applicable federal, state or local law.

All employment and promotional decisions will be based only on valid job requirements and will be made in accordance with the principles of equal employment opportunity. It is the expectation of the Bank that all personnel actions, such as compensation, transfers, layoffs, Bank-sponsored training programs, education, tuition assistance, social and recreational programs shall continue to be administered without regard to race, religion, color, national origin, ethnicity, citizenship, sex (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity, genetic information, age, military or veteran status, disability, or any other characteristic protected by applicable federal, state or local law. We will continue to ensure that promotion decisions are in accord with the principle of equal employment opportunity by imposing only valid requirements for promotional opportunities.

Reasonable accommodation of religious practices and disabilities will be granted if such accommodation can be achieved without undue hardship.

If an employee believes someone has violated this policy, the employee should follow the reporting procedure outlined in the Non-Harassment/Non-Discrimination policy. The Bank will promptly investigate the facts and circumstances of any claim this policy has been violated and take appropriate corrective measures. Anyone found to be engaging in any type of conduct in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion or discrimination because they: (1) file a complaint with the Bank or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state or local equal employment opportunity statute; (3) oppose any act or practice made unlawful by federal, state or local law requiring equal employment opportunity; or (4) exercise any other employment right protected by federal, state or local law requiring equal opportunity or its implementing regulations.

The Bank will continuously monitor all personnel actions to ensure that they are not discriminatory. This policy is continuously disseminated and communicated throughout the Bank, especially to all levels of management and those individuals engaged in recruiting, employment and training activities. Each manager is responsible for carrying out the objectives of the Bank's equal employment policy as an integral part of his or her duties. Constant monitoring of the progress is required and every good faith effort shall be made to meet the legal and moral responsibilities of the Bank in equal employment.

Westfield Bank maintains an audit and reporting system to determine overall compliance with its equal employment opportunity policy. Overall responsibility for the implementation of Westfield Bank's equal employment opportunity programs and for affirmative action efforts is assigned to Erin Ploucha, Chief Administrative Officer who may be reached at 330-345-4897.

Westfield Bank's Equal Employment Opportunity policy, as well as its affirmative action efforts, includes the full and complete support of Westfield Bank, including its Chief Executive Officer.