



EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY

Organizational Functional Area:	Human Resources
Policy Name:	Equal Employment Opportunity and Affirmative Action Policy
Board Approved:	October 2024
Policy Owner Review Date:	September 2024
Last Revision Date:	September 2024
Department or Individual Responsible For Maintaining and Updating Policy or Program:	Director of Human Resources

POLICY STATEMENT

General

Montecito Bank & Trust (MB&T) reaffirms its belief and commitment in equal employment opportunity for all associates and applicants for employment in all terms and conditions of employment.

MB&T has developed and maintained a written Affirmative Action Program (AAP) as required under Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). MB&T's Chairman and Chief Executive Officer, Janet Garufis, supports the affirmative action program and urges each associate to commit to carrying out the intent of this policy. MB&T maintains an audit and reporting system to determine overall compliance with its equal employment opportunity (EEO) goals. The EEO Administrator, Heather Ames, oversees the affirmative action plan development, modification, implementation, effectiveness, reporting requirements and conducts management updates.

As part of MB&T's commitment to this overall process, it will seek to ensure that all aspects of employment, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, layoff and termination processes remain free of discrimination or harassment based upon actual or perceived race (including traits historically associated with race including, but not limited to, hair texture and protective hairstyles such as braids, locks, and twists), color, religion, sex, age (age 40 and over), sexual orientation, gender, gender identity, gender expression, national origin, ancestry, physical disability (as defined under Section 503 of the Rehabilitation Act of 1973), mental disability, medical condition, genetic information, marital status, reproductive health decision making, citizenship status, primary language, military and veteran status or any combination of the aforementioned actual or perceived characteristics, and any other factor made unlawful by federal, state, or local law. MB&T also prohibits unlawfully discrimination based on a perception that the person is associated with a person who has, or is perceived to have, any of the aforementioned characteristics or any combination of those

characteristics. MB&T ensures that all employment decisions are based only on valid job requirements.

In addition, MB&T provides support to local and national community service and action programs designed to improve employment opportunities of women and minorities.

Equal Opportunity Survey

MB&T shall prepare and file with the Equal Employment Opportunity Commission an Employer Information Report EEO-1 report by the applicable deadline. The workforce snapshot period will be a pay period of the employer's choice between October 1st and December 31st of the applicable year.

Notices

MB&T will post in conspicuous places, available to associates and applicants for employment, notices setting forth the provisions of the MB&T's nondiscrimination policy as prescribed by law.

Advertising

MB&T will, in all solicitations or advancements for associates placed by or on behalf of MB&T, state that all qualified applicants will receive consideration for employment without regard to the Protected Characteristics listed above. When MB&T advertises the availability of a position, careful attention is paid to the text of the advertisement, as well as to the media in which the advertisement is placed. Further, job titles used in advertisements will not indicate a preference or limitation based on an individual's Protected Characteristics. In addition, job responsibilities or job qualifications will not be described in a way that would tend to exclude applicants who are members of a protected class.

Non- discrimination pay transparency

MB&T will not discharge or in any other manner discriminate or retaliate against any associate or applicant for employment because such associate or applicant has inquired about, discussed, or disclosed the compensation of the associate or applicant or another associate or applicant. MB&T shall also include pay scale information on all job postings as required by law. This provision shall not apply to instances in which an associate who has access to the compensation information of other associates or applicants as a part of such associate's essential job functions discloses the compensation of such other associates or applicants to individuals who do not otherwise have access to such information, unless such disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or is consistent with the contractor's legal duty to furnish information.

Accommodations for Associate religious beliefs or practices

MB&T respects the religious beliefs and practices of all associates and will make, on request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on MB&T's business operations.

The associate's immediate supervisor will evaluate the request considering whether a work conflict exists due to a sincerely held religious belief or practice and whether an accommodation is available that is reasonable and that would not create an undue hardship on MB&T's business operations. An accommodation may be a change in job, using paid leave or leave without pay, allowing an exception to the dress and appearance code that does not affect safety or dress code requirements, or for other aspects of employment. Depending on the type of conflict and suggested accommodation, the supervisor may confer with his or her manager and with the Director of Human Resources. The supervisor and associate will meet to discuss the request and decision on an accommodation.

AUTHORITY AND RESPONSIBILITY

Board of Directors

It is the responsibility of the Board of Directors to maintain an EEO policy and to ensure the Executive Committee's commitment to complying with the policy. It is also the responsibility of the Board to assign responsibility and accountability for MB&T's Affirmative Action Program to an appropriate member of the Executive Committee, and to ensure that individual has the authority, resources, and support of the Executive Committee and Senior Management to ensure the effective implementation of the affirmative action program.

Management

- 1) Montecito Bank & Trust, through its responsible managers, recruits, hires, trains, transfers, and promotes in all job titles without regard to any Protected Characteristic, except where an accommodation is unavailable and/or it is a bona fide occupational qualification.
- 2) Managers shall ensure that all personnel actions such as compensation, benefits, terminations, MB&T-sponsored trainings, and social and recreational programs shall be administered without regard to any Protected Characteristic, except where an accommodation is unavailable and/or it is a bona fide occupational qualification.
- 3) Managers shall base employment decisions on the principles of equal employment opportunity and with the intent to further Montecito Bank & Trust's commitment to affirmative action and equal employment. At no time will any covered associate, or covered applicant for employment, who exercises his/her rights pursuant to Montecito Bank &

Trust's Affirmative Action Policy be subject to discipline or have his/her opportunities for employment adversely affected.

- 4) Managers shall take affirmative action to ensure that qualified minority group individuals, females, disabled, or protected veterans are introduced into the workforce, are encouraged to aspire for promotion, and are considered as promotional opportunities arise.
- 5) Montecito Bank & Trust invites any associate or any applicant for employment to review Montecito Bank & Trust's written Affirmative Action Programs. These programs are available for inspection upon request between 8:00 AM - 5:00 PM at the Human Resources department. Any questions should be directed to your supervisor, senior manager, or Heather Ames, Equal Employment Opportunity Administrator.
- 6) Applicants and associates are encouraged to identify their race and gender. This self-identification is strictly voluntary and confidential and will not result in retaliation of any sort.
- 7) Applicants and associates are invited to self-identify as an individual with a disability or protected veteran status. This self-identification is strictly voluntary, confidential and will not result in retaliation of any sort.
- 8) MB&T will ensure that associates and applicants shall not be subjected to harassment due to their status described above, or any harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities; (1) filing a complaint with MB&T or with federal, state, or local agencies regarding status covered under this Policy, (2) assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute pertaining to the status covered under this Policy; (3) opposing any act or practice made unlawful by section 503 and/or VEVRAA, and (4) exercising any other right protected by section 503 and/or VEVRAA or its implementing regulations in this part.

Audits

MB&T has designated the Chief Audit Executive (CAE) to manage a risk-based audit calendar that includes independent, periodic reviews of MB&T's Human Resources function to ensure that an adequate system of internal controls exists. The internal audit may be conducted with internal resources or by an external audit firm overseen by the CAE.

The scope of the internal audit will include a review of policy and procedures, hiring and termination practices, associate performance and compensation process and compliance with Affirmative Action laws.

Results of the audit are reported to management and require corrective action if appropriate. Audit reports are also presented to Executive Management and the Audit Committee of the Board of Directors.

RECORD KEEPING AND DOCUMENTATION

MB&T maintains procedures to ensure information and reports are provided as required by Executive Order No. 11246, and by the rules, regulations, and orders of the Secretary of Labor, or pursuant thereto. The Human Resources Department maintains and makes available to OFCCP documentation for purposes of investigation to ascertain our compliance with such rules, regulations, and requirements detailed herein. Specifically, MB&T maintains any personnel or employment records made or kept for a period of three years from the date of the making of the personnel record or the personnel action, whichever occurs later. Examples of records that must be maintained include: job descriptions; job postings and advertisements; applicant flow data; records of job offers; hiring records; applications and resumes; interview notes; tests and test results; written employment policies and procedures; wage and job information, upward mobility action records, and records of terminations and demotions; and personnel files. If at any time MB&T has fewer than 150 associates, or a "government contract" as defined above of at least \$150,000, we may only keep records for one year.

Effective January 1, 2015, in compliance with new OFCCP regulations, MB&T must also collect information on applicants who self-identify as protected veterans and individuals with disabilities. This information must also be maintained for a period of three years.

Effective December 13, 2000, applicant records maintained by MB&T will identify (where possible) the gender, race and ethnicity of each applicant.

POLICY REVIEW

This policy shall be reviewed by Board of Directors, or a delegated committee, as necessary.