

POLICY STATEMENT

On behalf of Needham Bank, this is a statement of intention to make all reasonable efforts to live up to its Equal Opportunity policy and Affirmative Action Plan. The Plan has been prepared to accurately reflect the company's current status, its actions to date, and its intentions for the future. Overall responsibility for fulfillment of the Equal Employment Opportunity policy and Affirmative Action Plan is assigned to Linda Farley, SVP Human Resources, who will periodically conduct analyses of all personnel actions to ensure that the company is living up to its stated intention.

The management of the company is responsible for the ongoing monitoring of all personnel actions in their respective areas of supervision, and will carry out the intentions of the Equal Opportunity policy and Affirmative Action Plan to the fullest extent possible.


Employment practices at the company are non-discriminatory and are based upon factors that are job-related. Factors such as race, color, religion, gender, national origin or ancestry, age, disability, veteran status, military service, sexual orientation, genetic information, or gender identity are not job-related. The Affirmative Action Plan is designed to report and monitor all related procedures that will include, but will not be limited to:

1. Recruiting, hiring, training, and promoting applicants and employees in all job classifications without discrimination;
2. Basing decisions on employment so as to further the principle of equal employment opportunity;
3. Ensuring that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities; and
4. Ensuring that all other personnel actions, such as compensation, benefits, transfers, layoffs, return from layoffs, company-sponsored training, education, tuition assistance, social and recreational programs, will be administered without discrimination.

Needham Bank promises not to retaliate against any person who files a complaint concerning Equal Opportunity or Affirmative Action and will ensure that no one harasses, intimidates, threatens, coerces, or discriminates against any individual exercising rights under this policy.

The Persons with Disabilities and Veterans Affirmative Action Plan is available for inspection in the Human Resources Department during normal business hours. Please contact Linda Farley, SVP Human Resources, for further information.


Joseph P. Campanelli
President & CEO


Linda Farley
SVP Human Resources

PAY TRANSPARENCY NONDISCRIMINATION PROVISION

Needham Bank 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. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Bank; or (c) consistent with the Bank's legal duty to furnish information. 41 CFR 60-1.35 (c)