

STEUBEN TRUST COMPANY

Diversity & Inclusion Policy and Supplier Procurement Policy

Commitment to Diversity

Steuben Trust Company (the “Bank”) recognizes that a key to our continued success is hiring talented employees who are committed to contributing to our success and dedicated to the progress of the Company’s mission. We value the talent, knowledge, and experience that employees bring to the workplace and we encourage innovation and continuous improvement that will drive our future success. The Bank is committed to maintaining an impartial environment, while recognizing that our size and the largely rural nature of our marketplace can present challenges to accomplishing diversity. Diversity inclusion encompasses the Bank’s board of directors, officers, employees, customers, vendors and the communities served. Diversity and inclusion is not about creating advantages for some, it’s about removing barriers for all. We take pride in a culture that is inclusive of all backgrounds and experiences.

Workforce and Equal Employment Opportunities

We are committed to providing an environment free of discrimination. Diversity and inclusion efforts of managers and employees will be considered as part of the performance evaluation process.

Steuben Trust Company and its affiliates provide equal opportunities to all employees and qualified applicants for employment without regard to age, religion, race, creed, color, national origin, citizenship, gender, sexual orientation, gender identity, veteran status, disability, genetic predisposition or carrier status, marital status or any other basis protected by federal or state laws.

In addition, Steuben Trust Company complies with applicable federal and state laws governing non-discrimination in its employment practices.

Procurement and Business Practices – Supplier Diversity

The Bank will include minority and women-owned businesses among its vendors and evaluate their performance in the same manner as other vendors are evaluated. Efforts will be made to create customer relationships with minority and women-owned businesses. Employees are encouraged to develop relationships with women and minority oriented professional organizations and educational institutions.

Transparency and Reporting of Diversity and Inclusion

The Bank appoints the Human Resources Manager as the Diversity and Inclusion Officer. The Diversity Officer will oversee diversity training of the Bank's employees. The Diversity Officer will be responsible for reporting to the Board of Directors on the Bank's progress in implementing and complying with its Diversity and Inclusion Policy. The Diversity Officer shall have the authority to create working groups of employees to assist him/her in monitoring progress as needed.

The Bank appoints the Chief Financial Officer as the Supplier Diversity Officer (SDO). The SDO will oversee the selection of available suppliers to choose from with respect to factors such as price, quality, business location, attention to detail, customer relationship or future relationship potential, as well as identifying how much is spent procuring, contracting and subcontracting for goods and services with minority-owned and women-owned businesses. The SDO will be responsible for reporting to the Board of Directors on the Bank's progress in implementing and complying with the Supplier Procurement Policy. The SDO shall have the authority to create working groups of employees to assist him/her in monitoring progress as needed.

The Company's website includes this Diversity Policy so that our communities, vendors, customers and potential customers, potential employees, and other interested parties are aware of our commitment.

Self Assessment

The Bank's committee assigned to diversity and inclusion efforts will self assess our Diversity and Inclusion Policy and report the results to Executive Management and the Board of Directors for approval periodically. The Company's Diversity and Inclusion Policy will be monitored annually by Risk Management.