

**AFFIRMATIVE ACTION/
EQUAL OPPORTUNITY POLICY STATEMENT**

It is the policy of Adirondack Bank not to discriminate against any employee or applicant for employment on the basis of their race, color, religion, age, sex, national origin, marital status, disability, protected Veteran Status, sexual orientation and gender identity, genetic information, victims of domestic violence and stalking, familial status, and all other categories covered by law. 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 at all levels of employment.

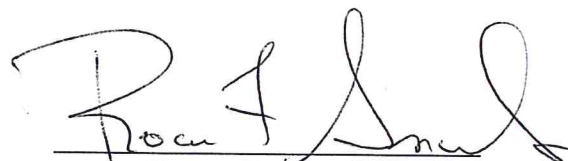
The Bank is very committed to EEO and Affirmative Action in all aspects of its business and will utilize affirmative action to make employment decisions so as to further the principle of equal employment opportunity. Personnel decisions are based only on valid job requirements, and we will make all reasonable accommodations necessary to employ and advance in employment-qualified persons with disabilities, newly separated veterans, protected veterans, and disabled veterans.

Employees of and applicants to Adirondack Bank will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans.

If you would like to review our Affirmative Action Plans for veterans and individuals with disabilities, please contact the Director of Human Resources during normal business hours.

As the Chief Executive Officer of Adirondack Bank, I wish to add my personal note of commitment to assuring that our organization carries out our Equal Employment Opportunity policy and fulfills the obligations of our Affirmative Action Plan. I expect the support of all employees in attaining and maintaining our goals for a workplace free of discrimination. Equal employment opportunity is not accomplished at the expense of any group or individual, but rather it is good business practice and it contributes to an organization enriched by diversity and excellence.

Adirondack Bank is determined to be in full compliance with the provisions of the Law and of the Affirmative Action Program.



Rocco F. Arcuri, Sr.

Effective: January 1, 2019