

## AMERICANS WITH DISABILITIES ACT (ADA) POLICY

It is the policy of Fieldpoint Private to ensure that communications with individuals with disabilities are as effective as communications with individuals without disabilities, consistent with the requirements of title III of the Americans with Disabilities Act (ADA), 42 U.S.C. 12181-12189, and the regulation implementing title III, 28 C.F.R. pt. 36. To meet this obligation, Fieldpoint Private will provide, free of charge, appropriate auxiliary aids and services, whenever necessary, to ensure that individuals with disabilities have an equal opportunity to participate in and benefit from, Fieldpoint Private's goods, services, facilities, privileges, advantages, accommodations or employment opportunities. 28 C.F.R. 36.301©, 36.303. This policy applies to all members of the public with disabilities contacting or attempting to contact Fieldpoint Private's services, locations and facilities, as well as those disabled individuals seeking employment opportunities.

Appropriate auxiliary aids and services include a wide variety of equipment, materials and services that may be necessary to ensure effective communication for people with disabilities.

For people who are blind or have low vision, Fieldpoint Private, upon request, will provide the following auxiliary aids and services:

- Qualified Readers
- Printed information in large print
- Oral descriptions of action and visual information to ensure the accessibility or proceedings and presentations
- Note takers
- Assistance in filling out forms
- An assistant to guide the person to find his/her way to an unfamiliar location or along an unfamiliar route within any of the Banks's locations

For people who are deaf, or hard of hearing, or have speech impairments, Fieldpoint Private, upon request, will provide the following auxiliary aids and services:

- Qualified oral/sign language interpreters
- Written Notes
- Note Takers
- Amplified and hearing aid compatible telephones

To protect the Bank's clients with disabilities from inappropriate or unauthorized professional or personal involvement by a third party or invasion of an individual's right to keep personal, medical or financial information confidential from friends and family members, the Bank will not ask or require third parties, including friends or family members of a client with a disability, to interpret, read, or fill out forms, or provide auxiliary aids or services for individuals with disabilities.

In accordance with Department of Justice ADA Title III 28 C.F.R. 36.301, the Bank will not ask people with disabilities to pay or be charged for the cost of an auxiliary aid or service needed for effective communication.

All requests for auxiliary aids and services will be directed to the Bank's Compliance Officer. Requests will be accepted from an individual with a disability who needs the auxiliary aids or services or by an authorized person acting on that individual's behalf. Requests will be accepted either in writing or orally and should be made in advance, when possible. It is Fieldpoint Private's policy that all requests for auxiliary aids and services be addressed timely and in accordance with ADA requirements.

In determining which types of auxiliary aids and services to provide so as to ensure effective communication, Fieldpoint Private will consult with the requesting individual. The Bank will respond promptly to all requests to ensure that individuals with disabilities have a full and equal opportunity to participate in and benefit from the goods, services, facilities, privileges, advantages and accommodations offered by the Bank. Fieldpoint Private will not request or require documentation of a disability, nor will the Bank disclose information about the individual's disability or request for auxiliary aids or services except to bank personnel who have a need to know this information in connection with providing services to the individual.

Except for simple requests that are immediately granted, the Compliance Officer will maintain records of requests for auxiliary aids and services. These records will include the following:

- Date of request
- Name of individual making the request
- Name of the individual for whom the request is being made
- Date of response to the request
- Detailed description of the auxiliary aids and services provided

- Date the actual services or auxiliary aids were provided

If for any reason Fieldpoint Private is unable to provide the specific auxiliary aids and/or services requested, the Bank will document the Bank will provide reasonable alternative aids and/or services, and document the nature of the alternatives provided, the date they were provided, the reason for denying the requested auxiliary aids and services, and the name and title of the Bank Official who made the decision to provide alternative aids and/or services.

As stated in the regulation, Fieldpoint Private is not required to provide a requested auxiliary aid or service if it can demonstrate that doing so would fundamentally alter the nature of the goods, services, facilities, privileges or advantages being offered, or would result in significant difficulty or expense. In such circumstances, the Bank will adopt other feasible measures to ensure that the individual with a disability receives the goods, services, facilities, privileges, advantages, or accommodations offered by Fieldpoint Private. All decisions of this type will be documented by the Compliance Officer and include the specific reason for reaching this conclusion.

### **Employment Opportunities:**

Fieldpoint Private is also committed to ensuring equal opportunity in employment for qualified persons with disabilities. The Bank conducts all employment practices and activities on a non-discriminatory basis.

Hiring procedures have been reviewed and verified to provide meaningful employment opportunities for people with disabilities. When asked, the Bank will make job applications available in alternative, accessible formats. The Bank will also provide assistance in completing the application. All pre-employment inquiries are restricted to the applicant's ability to perform the duties of the job.

Reasonable accommodation is available to an employee with a disability when the disability affects performance job functions. Fieldpoint Private makes employment decisions based on the merits of each situation in accordance with defined criteria, not the disability of the individual.

### **Facilities:**

Fieldpoint Private has made the following attempts to ensure ADA Compliance in all of its offices:

- The Bank offers an alternative method of banking by providing all clients with or without disabilities the option to perform all banking transactions in a unique private office setting which eliminates the need for traditional check stands and teller counters.
- All routes into and within the building meet the clear floor space requirements of the regulation.
- Single-user bathrooms provide clearance for both a forward and a parallel approach and the lavatories provide required clear space.