

TRAILWEST BANK

DIVERSITY AND INCLUSION POLICY

NEW JUNE 2017

Board Review and Approval Annually

Board Approval: February 21, 2018

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I. Definitions

Diversity refers to the following minorities: Black Americans, Native Americans, Hispanic Americans, Asian Americans, and women.

Inclusion means a process to create and maintain a positive work environment that values individual similarities and differences, so that all can reach their potential and maximize their contributions to an organization.

II. Commitment to Diversity and Inclusion

TrailWest Bank (TWB) believes that promoting diversity is an important aspect of our service to our employees and our communities. TWB places high value on and respects the diverse culture of our employees, vendors, and customers. TWB is committed to preserving an open environment to ensure the safety of all employees, vendors, and customers.

III. Workplace and Employment Practices

The Bank is committed to providing a work environment that promotes equal opportunities for all in compliance with the Equal Credit Opportunity Act. The Bank prohibits any unlawful discrimination or harassment based on race, color, religion, national origin, sex, marital status, or age.

Searches for new employees are conducted by word of mouth, online postings, local print and media, Branch posters, and at Job Fairs.

TWB has created and maintains a positive work environment that embodies the definition of inclusion.

IV. Procurement and Business Practices

Due to the Bank's size and location in rural Montana, the practicality of specifying businesses based on their diversity is unfortunately, and understandably, very limited. The Bank's first priority is to use our current customers before attempting to find minority-owned vendors. The Bank will search the national MWBE.com site for Minority and Women Based Enterprises. At this time, there are none registered in the State of Montana.

V. Practices to Promote Transparency

The Board of Directors and staff receive training on related policies and practices. Our Diversity and Inclusion Policy is posted on our website in order that our community, vendors, and potential employees can be aware of it.

VI. Self-Assessment

During the first quarter of each calendar year, the Bank will perform a self-assessment for the previous year using the FDIC self-assessment form located

at www.fdic.gov/about/diveristy. This form will be submitted to the FDIC at Section342@fdic.gov.

VII. Board Review and Approval

The Board of Directors will review and approve the Diversity and Inclusion Policy on an annual basis. Changes will be made as needed.