

SABAL PALM BANK

AMERICANS WITH DISABILITIES ACT POLICY

It is the policy of Sabal Palm Bank to comply with the public accommodations provisions of the American with Disabilities Act. No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of this bank because he or she has a physical impairment that substantially limits one or more of the major life activities.

All public areas of the bank shall be designed in accordance with all regulations regarding accommodation of the physically impaired. In addition, all products and services of the bank shall be made available in an area, and by means, which are readily accessible, by the physically impaired.

The operations and facilities personnel are directed to work with the bank's compliance officer to prepare procedures to implement this policy and to recommend to this board such changes to this policy as they deem appropriate in the future as the Americans with Disabilities Act is clarified by regulatory authorities and the courts. Any exceptions to this policy must be approved in advance by the President and all such exceptions shall be brought to the attention of the board at its next regular meeting.

Web Content Accessibility Guidelines (WCAG)

Sabal palm Bank is committed to providing accessible services to all our customers, including those who have disabilities. The Bank's IT policy will be expanded to include an accessibility statement and language for compliance with the requirements. The guidelines include content on mobile, television, and other delivery channels.

Enforcement and Oversight

The Board of Directors has the authority to approve and enforce this Policy. Changes to this Policy require approval by the Institution's Board of Directors; however, Senior Management is responsible for ensuring that the policy is implemented and administered in compliance with this Policy.

Changes to any corresponding operating procedures may be approved by the Compliance Officer and/or appropriate senior manager over the impacted area. It is the responsibility of each employee and director to comply with this Policy and any applicable laws, rules, regulations, and, if appropriate, regulatory issued guidance.

Audit and Monitoring

Periodically, the Institution's Compliance Officer shall audit the Institution's compliance with this Policy and report the results of such audit to the Board of Directors.

Training

The Compliance Officer shall coordinate to ensure appropriate training to new and existing employees.