



EQUAL EMPLOYMENT OPPORTUNITY/ AFFIRMATIVE ACTION POLICY

The Company is an Equal Opportunity Employer, committed to maintaining a work environment that is free from unlawful conduct. Employment at the Company is based on personal capabilities and qualifications, without regard to race, color, religion, sex, sexual orientation, gender identity, gender expression, age, marital status, national origin, ancestry, disability, veteran or military status, pregnancy, genetic information, or any other characteristic protected by Applicable Law.

Employees and applicants of Academy Bank N.A. will not be subjected to any form of harassment or discrimination for exercising rights protected by, or because of their participation in, an investigation or compliance review related to Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, the Americans with Disabilities Act, Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state nondiscrimination law, rule, or regulation. The Company complies with all applicable federal, state, and local laws governing nondiscrimination in employment in every location in which the Company has facilities.

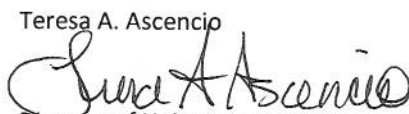
This policy extends to all associates and all applicants for employment and to all terms and conditions of employment, including but not limited to, recruitment, selection and placement, compensation, promotion and transfer, discipline, demotion, layoffs and terminations, training, leaves of absence, working conditions, and benefits. The Company will not tolerate unlawful discrimination or harassment in the workplace.

Associates who feel they have been discriminated against on the basis of any category covered by this policy by another associate, a customer, or other person doing business with or for the Company, should report the matter, as provided in Policy 1.13 in the Employee Handbook, to HRComplaints@dfckc.com.

Applicants who feel they have been discriminated against by one of our associates on the basis of any category covered by this policy should report the matter to HRComplaints@dfckc.com in writing, including as many specific facts as possible, including nature of the incident, dates, time, names, witnesses to improper conduct, and the impact of the conduct. Include copies of any documents supporting the complaint. In the event circumstances prevent an applicant from making a written report immediately, the applicant should report the incident to the Director of Human Resources at 816-412-6081.

All matters will be investigated and appropriate disciplinary action will be taken, up to and including termination of employment, if necessary. Retaliation against anyone who complains of or witnesses behavior contrary to this policy is also prohibited.

The Company maintains affirmative action policies pursuant to which the Company engages in affirmative action efforts to employ and advance in employment military veterans, disabled individuals, women, and minorities. These affirmative action efforts are consistent with our Equal Employment Opportunity Policy in that they seek to increase the pool of qualified applicants in these categories and do not seek to advance less qualified individuals in these categories over more qualified candidates. Associates or applicants who wish to review the full narrative portion of one of the bank's affirmative action programs for females and minorities, individuals with disabilities, and/or veterans may schedule an appointment to do so by contacting the Director of Human Resources during normal business hours.

Teresa A. Ascencio

Director of Human Resources
Senior Vice President