AFFIRMATIVE ACTION POLICY STATEMENT

It is the policy of Rochester Midland Corporation to provide employment, training, compensation, transfer and promotional opportunities, and other aspects of employment without regard to sex, race, color, religion, national origin, marital status, sexual orientation, or age, and to qualified handicapped individuals, disabled veterans, and Vietnam era veterans. This policy is supported by the Senior Management and the Board of Directors of Rochester Midland Corporation.

When we are hiring or promoting in those job categories in which women, minorities, handicapped individuals or veterans are underutilized, we will take affirmative action to seek out qualified applicants without regard to sex, race, color, age, national origin, handicap, or veteran status.

At Rochester Midland Corporation, all terms and conditions of employment are, and will continue to be, established on the basis of the individual's qualifications and ability to perform the job.

Elizabeth J. Waidelich, Senior Vice President of Human Resources, is designated as the Equal Employment Officer of Rochester Midland Corporation and will be the primary responsible Company executive for communicating, implementing, and supporting this policy. Any questions, comments, or complaints should be directed to Ms. Waidelich. Employees are protected by Rochester Midland Corporation from coercion, intimidation, interference, or discrimination for filing a complaint or assisting an investigation which falls under this policy. Company policy ensures that Rochester Midland Corporation will not condone retaliatory action in any form for any reason against any employee or employees, management or non-management, by any other employee or employees, management or non-management.

Harlan D. Calkins

Chairman &

Chief Executive Officer