

BANKFIRST

Language Access Policy

Board Approval
Date: 3/20/2024

Policy Custodian:
CDFI Department
Ralph D. Carter

Version History			
Version	Author	Revision Date	Description of Change
V1.032024	Ralph D. Carter	03/15/2024	Creation of policy

Policy Statement

It is the policy of BankFirst to not discriminate against any person who may have limited English proficiency (LEP). As a Community Development Financial Institution (CDFI), BankFirst will provide timely and meaningful access to all financial products and services to LEP customers. All personnel shall provide free language assistance services to LEP individuals whom they encounter based on the provisions set forth in the Language Assistance Plan (LAP).

Purpose and Authority

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for CDFI bank and holding company personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following the guidelines as established in the Language Assistance Plan (LAP) is essential to the success of our mission to promote community development in the communities at risk of being financially underserved or distressed, with a view of improving social and economic conditions of the residents of, and businesses located in, our target markets.

Language Assistance Measures

Based on the guidelines established in the BankFirst Language Assistance Plan for Limited English Proficiency Individuals, all personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP persona requests language assistance services, provided the availability as established in the LAP. The public website of the bank will provide notice of available language assistance services.

Policy Review

This policy will be reviewed by management at least annually and approved by the Board of Directors each year.

BANKFIRST

Language Assistance Plan

For Limited English Proficiency Individuals

Management Approval Date

3/20/2024

Plan Custodian:

CDFI Department

Ralph D. Carter

Version History			
Version	Author	Revision Date	Description of Change
V1.022024	Ralph D. Carter	02/26/2024	Plan development

BACKGROUND

BankFirst Financial Services and BankFirst Capital Corporation (collectively “Bank”) became certified as Community Development Financial Institutions (CDFI) in 2010. This designation recognizes the 125-year history of generating economic opportunity for underserved people and communities where the bank has operated.

The Bank generates economic opportunity in underserved low-income communities by expanding access to credit, capital, and financial services. It accomplishes this by providing financial products (loans and lines of credit) and financial services (checking, savings, and money market accounts).

The purpose of this plan is to identify the responsibilities of BankFirst for providing Limited English Proficiency (LEP) individuals with meaningful access to vital documents and information about its financial products and services (Executive Order 13166 and Title VI of the Civil Rights Act of 1964). The following information discusses the translation services available and a brief description of the Bank’s programs and customers, as well as future plans to serve LEP individuals.

LEP Assessment and Services

The volume of service to LEP individuals is extremely small because of the low number of foreign-language individuals within our market communities.

Assessment of Need

Using both the U.S. Census Bureau ACS Estimates for 2022 of “Language Spoken at Home” and the Civil Rights Data Collection (CRDC) survey from 2020-21 of English Learner Program, we have been able to determine that less than 4.5 percent of the population that make up our service area consist of Spanish-language speakers and less than 1 percent of the population are Asian-languages speakers.

Providing Language Assistance Services

Effective communication with LEP individuals can come in two forms: oral and written. The Bank has reviewed both the language needs of our communities and the business need to invest in written translation of loan and deposit documents and disclosures. The Bank will decide how to allocate its resources for translation services based on relevance, time, or cost restraints. The Bank website (www.bankfirstfs.com) can be translated into another language using the free built-in Translate tool of Google Chrome. The Title VI Equal Opportunity for All poster provides the information in both English and Spanish.

Regarding oral interpretation, the Bank is exploring options to provide for telephonic interpretation services through a third party. The timeline of implementation will be dependent

upon the frequency in which we have LEP interactions with our deposit and lending personnel. Periodic surveys to frontline Bank employees will continue to request the frequency of LEP interaction along with the type of translation or interpretation provided and available.

Notices of Language Assistance

The Bank will provide free language assistance based on the allocation of resources for these services. Language identification cards are distributed to frontline staff to be used when interacting with LEP individuals to aid in determining what language assistance services are needed.

Monitoring

The Bank keeps current on shifting population demographics and needs through an annual review of U.S. Census Bureau ACS data and bi-annual review of CRCD results. Additionally, any translation request is routed through the CDFI Department's LEP Coordinator, Ralph Carter. All policies and procedures are reviewed annually to ensure that changes are timely and accurate. This LAP is also reviewed annually for updates.

Training

Frontline employees, management, and new employees are trained annually on the Bank's Language Assistance Program and plan. This training is conducted in various methods based on the resources available. Bank management provides memorandums, guidelines, information, and procedures to staff regarding the Bank's responsibility to LEP individuals.