

LANGUAGE ASSISTANCE PLAN FOR LIMITED ENGLISH PROFICIENT INDIVIDUALS

PURPOSE

The mission of **PriorityOne Capital Corporation** and its subsidiary bank, **PriorityOne Bank** (“Bank”), is to promote community development in its designated Target Market, a group of underserved populations and/or economically distressed communities, through the provision of responsible financial products, financial services and development services (as defined in 12 CFR Part 1805) to the Target Market, all with a view towards improving the social and economic conditions of the Target Market.

The purpose of this Language Assistance Plan (“LAP”) is to identify our responsibilities for providing Limited English Proficient (“LEP”) individuals with meaningful access to our products and services and to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for our personnel to follow when providing services to, or interacting with, LEP individuals.

ASSESSMENT

As a community bank, PriorityOne interacts with the public on a daily basis, primarily through our website and retail spaces. Using recent U.S. Census Bureau data, we have been able to determine that only **1.47%** of the population within our Target Market are LEP individuals, with the predominant language among them being Spanish. As a result, the likelihood of LEP individuals interacting with the Bank is low. This is consistent with our past experience interacting with the public.

LANGUAGE ASSISTANCE SERVICES

Although there is a low volume of LEP individuals in our Target Market, we are committed to improving the accessibility of our products and services to help ensure full participation by LEP individuals. We believe that all consumers, regardless of the language they speak, should have meaningful access to our products and services. As such, we offer the following Language Assistance Services:

- Upon request and within a reasonable time, we will provide translations of our written materials (*e.g.*, applications, instructional forms, etc.) into other languages as needed. Resources for translation services will be allocated based on relevance, time, and/or cost restraints.

- Upon request and within a reasonable time, we will utilize a third-party vendor to provide interpretation services to LEP individuals as needed. Resources for interpretation services will be allocated based on relevance, time, and/or cost restraints.
- We offer on-staff interpretation services to LEP individuals. We have several staff members who are bilingual (English and Spanish) and provide interpretation services when needed.

The Language Assistance Services discussed above are provided free of charge, and customers are notified of these offerings through our website as well as written displays in the entry way or lobby of each of our branch locations. In addition, 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.

TRAINING

We provide guidance to frontline staff and managers regarding engagement with LEP individuals through distribution of our Language Assistance Plan, staff training, and orientation sessions. The staff training and orientation include instruction on the use of language identification cards to identify LEP individuals as well as how to access and use the third-party vendor translation and interpretation services. In addition, our retail and lending personnel are instructed to be watchful of LEP needs and quickly respond if they need assistance.

MONITORING

We've designated a Language Access Coordinator to implement and regularly update our Language Assistance Plan. The Language Access Coordinator will regularly review the U.S. Census Bureau ACS data along with the current Language Assistance Plan to assess the need for updates and/or changes to the LAP. In addition, periodic surveys of frontline staff will request the frequency of interactions with LEP individuals, and the type of translation or interpretation needed and ultimately provided. Customer satisfaction surveys of LEP individuals will be utilized as well to collect information based on their experience of our staff and the language assistance services received. Our Language Access Coordinator will monitor staff and customer survey responses and amend the LAP as necessary to address any needs and/or issues identified. Specifically, these responses will inform the Language Access Coordinator of whether there should be changes to the quantity or type of language assistance services offered by the Bank.