



<i>Organizational Functional Area:</i>	Branch Operations
<i>Procedure For:</i>	Language Assistance Plan for Limited English Proficient Individuals
<i>Department/Individual Responsible for Maintaining/Updating Procedure:</i>	President
<i>Approval Date:</i>	May 21, 2024

Language Assistance Plan for Limited English Proficient Individuals

Purpose

The mission of **Commerce Holding Corporation** and its subsidiary bank, **Commerce 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, we interact 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 **1.26%** 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 if feasible in light of time or cost restraints, we will provide written translations of our written materials (*e.g.*, applications, instructional forms, etc.) into Spanish.
- Upon request, and if feasible in light of time or cost restraints, we will utilize a third-party vendor to provide verbal interpretation services to Spanish-speaking LEP individuals.

The Language Assistance Services discussed above will be 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 will be distributed to frontline staff to be used when interacting with LEP individuals to aid in determining what language assistance services are needed.

Training

We will provide guidance to frontline staff and managers regarding engagement with LEP individuals. We will do this through distribution of our Language Assistance Plan, staff training, and orientation sessions. The staff training and orientation will 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, all staff are instructed to be watchful of LEP needs and quickly respond if they need assistance.

Monitoring

The Board of Directors has designated the President as the 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 or changes to the LAP.