



LANGUAGE ASSISTANCE PLAN

March 2025

Background

BHM Bank is a small, community bank with one location in the city of Birmingham, AL. We employ 9 individuals locally and serve approximately 400 total customers.

According to the most recent Census data, Birmingham is 25.6% White, 67.1% Black/African American, 1.4% Asian and 4.9% Hispanic/Latino. Birmingham and Jefferson County under-index significantly in foreign-born individuals and individuals who speak a language other than English at home as defined by the Census.

We have had no inquiries from non-English speakers over the past two years at minimum. This indicates that the demand for language assistance services is minimal within our locality.

	Total US	Jefferson County, AL	Birmingham, AL
White alone , percent	75.30%	52.90%	25.60%
Black or African American alone, percent	13.70%	43.40%	67.10%
American Indian & Alaska Native alone, percent	1.30%	0.30%	0.20%
Asian alone, percent	6.40%	1.90%	1.40%
Two or More Races, percent	3.10%	1.50%	3.40%
Hispanic or Latino, percent	19.50%	5.50%	4.90%
White alone, not Hispanic or Latino, percent	58.40%	48.10%	24.20%
Foreign born persons	13.90%	4.50%	4.40%
Language other than English spoken at home, percent of persons age 5+	22.00%	6.90%	6.70%

Sources:

<https://www.census.gov/quickfacts/fact/table/US/PST045224>

<https://www.census.gov/quickfacts/fact/table/jeffersoncountyalabama,birminghamcityalabama/PST045224?>

While, in our 25 years of service, we have yet to encounter any demand for language assistance services, we acknowledge the importance of accessibility and are implementing several steps to ensure that our products and services are available to LEP persons.

The steps we are taking are in proportion to the very low linguistic diversity in our service area. Additionally, as a small community bank that primarily serves a low-to-moderate income population, cost-effectiveness is a primary concern.

Emphasis on Spanish-Speaking Individuals

BHM's Language Assistance Program will focus on accessibility for Spanish-speaking individuals. Even though unlikely, it's the most likely second language we anticipate that we could encounter. Spanish speakers are currently the most prevalent foreign-language speaking community in our service area with approximately 6% of the Jefferson County population being Spanish-speakers (although, again, relative to the national average, we under index in Hispanic/Latino and/or Spanish-speaking individuals.) We are exploring services for customers who speak languages other than Spanish and will continue to monitor and assess the evolving needs of LEP persons in our area.

Policy

Purpose

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 the personnel of BHM Bank to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP). Following these guidelines is essential to our success in fulfilling our mission: *To Provide The Building Blocks To Financial Freedom*.

General Statement

It is the policy of BHM Bank to provide timely meaningful access for LEP persons to all programs and activities. All personnel shall be notified of current accessibility options to LEP individuals whom they encounter or whenever an LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that BHM will provide these services to them.

Language Assistance Measures

In alignment with our vision of *Financial Freedom for All*, BHM requires staff compliance with respect to reasonable language assistance measures. Staff will be trained that the following language assistance measures will be made available for LEP persons.

Website Translation

On February 13, 2024 in partnership with our website developer, BankSite Services, we installed a translation plug-in on our website. When customers visit bhm.bank they are able to translate the entirety of the website's content into Spanish by clicking on a flag in the top right corner of the site. The vast majority of current information (descriptions, fees, etc.) about our accounts and services is available on our website.

Certified Document Translation

We are in the process of leveraging certified translation services to translate current application documents into Spanish. We expect primary application documents to be translated and made available to the public by Q1 2026.

Contracted Certified Language Interpretation Services

If the need should arise, we will contract with local, certified language interpretation services to provide real-time interpretation either in person or via phone for LEP persons who do not otherwise have access to English interpretation. While interpretation services may not be immediately available, they will be made available within a reasonable timeframe based on the

needs of the customer. For immediate needs prior to scheduling with a certified interpreter, staff will be trained on online interpretation software (e.g. Google Translate or other comparable services).

Ongoing Assessment and Monitoring

Currently, there is very little need for an extensive language access program. However, BHM staff will be directed to continually monitor and assess the need for a greater emphasis on language access with quarterly reporting on the number of LEP persons who are accessing the bank's in-person services. We will also continue to monitor demographic changes in our target market as well as tap into the local Spanish-speaking community in order to assess current needs and stay ahead of shifting needs in this regard.

Timeframe

The above-stated measures will be implemented by Q1 2026.

Implementation

The bank's Holding Company Chief Impact Officer (CIO) will be responsible for plan implementation, ongoing monitoring and assessment of evolving needs with respect to Language Access of LEP persons. If the need should arise, the CIO will act as the Language Access Coordinator in partnership with the bank's Compliance Officer.

Staff will be trained on the availability of services and translated documentation, as well as the availability to utilize local contracted interpretation and translation services as needed.