

CRA BRANCH CLOSING POLICY

BANK OF DICKSON

FEBRUARY 8, 2022

## **BRANCH CLOSING POLICY**

The Board of Directors of the Bank of Dickson (Bank) are vested with the authority to designate the locations of the offices of the Bank, subject to regulatory approval. In making the determination of whether to close a branch facility, the Board shall consider the provisions of this policy. In the context of the Community Reinvestment Act of 1977 (CRA), as amended, the Bank, prior to the closing of branch facilities, should assess the potential impact on the Bank's ability to continue offering an appropriate level of services throughout its local community and should ensure that such a closing would not have an adverse impact on its local community. Some of the provisions of this policy may not be applicable to all situations and are not intended to be all inclusive.

### Physical Location

The physical location of any branch facility is a key element in the closure determination. The Board should:

- A) Determine what percentage of the Bank's present customers utilize the services of the branch facility and how they could be properly serviced at another location. It should also be determined what percentage of these customers will not remain customers of the Bank due to the closure and how this may affect the Bank.
- B) If a branch facility is to be closed temporarily (i.e., for repair or for new construction), determine alternatives to complete closure (i.e., temporary on-site offices via trailers, etc.). If this is not feasible, determine if services could be added to the nearest branch facility that would supplement service to those customers affected.
- C) Determine the effect on the availability of banking services through other branch facilities or competitor's office(s) in the area. If closure would substantially diminish the availability of such service, especially in low and moderate income areas, consider the feasibility of reducing current services to an economically feasible level while still providing banking services (i.e., reducing operational hours and/or staff, installing automated teller machines).
- D) Determine the possibility of utilizing affected employees in other branch facilities.

### Affected Customer Assistance

If closure of a branch facility is deemed necessary, the Board should offer assistance to customers affected by the closure in establishing alternative banking relationships. Assistance could include directing affected customers to other branch facilities, implementation of direct deposit, instruction on ATM use, and other pertinent assistance.

### Effect on Other Offices

The Board should determine what effect closure of a branch facility will have on other branches of the Bank. Areas to evaluate would include traffic flow, number of transactions, personnel adequacy, facility capacity, and management availability to customers.

### Statutory and Other Factors

The Board should consider any statutory requirements promulgated by the Tennessee Department of Financial Institutions and/or the FDIC regarding branch closure. In addition, the Board should evaluate the Bank's CRA obligations when considering the closure of a branch facility.