

CRA BRANCH OPENING POLICY

BANK OF DICKSON

FEBRUARY 8, 2022

BRANCH OPENING 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 open a new branch facility, the Board shall consider the provisions of this policy. The Board should determine whether a new branch facility would be readily accessible to all segments of the Bank's local community and whether the business hours and services of such a new branch facility will be tailored toward the convenience and needs of the Bank's 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 the proposed branch is a key element in determining the opening of a branch. The Board should:

- A) Determine what percentage of the Bank's present customers are in reasonably close proximity to the proposed site
- B) Determine projected new customers that might be obtained in opening the proposed branch
- C) Determine the accessibility (i.e., curb entrances, parking spaces, building signage, drive-in windows)
- D) Determine the cost efficiency of land
- E) Determine projected future area growth and other economic and social factors
- F) Determine availability of possible employees from local areas
- G) Determine how the proposed branch location fits in the Bank's goal of having offices accessible to all segments of the Bank's local community

Operational Hours

The hours of our offices should generally be consistent and uniform. However, special circumstances may apply in an area that may alter these hours. If so, the Board may take appropriate action which may include, but is not limited to:

- A) Extending operating hours;
- B) Opening earlier;
- C) Extending drive-in hours;
- D) Operating drive-in tellers only;

- E) Providing after hours depositories; and
- F) Providing Automated Teller Machines

Management Availability

The Board should determine how the new office will be managed and staffed. The Board should put special emphasis on providing for management from within the Bank, if possible.

Also, the Board should strive to match office management personnel with the areas that the branches will be located. The goal is to allow the Bank to better identify the credit needs of that area and to be more accessible to these types of groups.

Identify Area Concerns

The Board should solicit, identify, and respond to any concerns expressed by individuals in the area of the proposed branch facility. Concerns that might be expressed could include traffic congestion, signage, building accessibility, new jobs, and various other concerns. Solicitation of these concerns can be through community meetings and by word of mouth communication.

Statutory factors

The Tennessee Department of Financial Institutions and the FDIC takes the following statutory factors into consideration when approving an application to establish a new branch facility. The Board should evaluate these factors when considering the opening of a new branch facility:

- A) Financial History and Condition of the Bank
- B) Adequacy of Capital Structure of the Bank
- C) Future Earnings Prospects of the Bank
- D) General Character of Bank Management
- E) Convenience and Needs of the Community to be served
- F) Consistency of Corporate Powers

Other Factors

The Tennessee Department of Financial Institutions and the FDIC also considers the following factors when approving an application to establish a new branch facility. The Board should evaluate these factors when considering the opening of a new branch facility:

- A) National Historic Preservation Act of 1966
- B) National Environmental Policy Act of 1969
- C) Minimum Security Devices

D) Community Reinvestment Act of 1977, as amended