



I. Americans with Disabilities Act (ADA)

Consistent with the requirements of Title III of the Americans with Disabilities Act (“ADA”), it is the policy of Community Bank (“CBNA” or the “Bank”) not to discriminate against any individual with a disability in the full and equal enjoyment of our goods, services, facilities, privileges, advantages, and accommodations. It is also our policy to ensure that communications between our team members and individuals with disabilities are as effective as communications between our team members and individuals without disabilities. Consistent with these commitments, the Bank shall provide, free of charge, “auxiliary aids and services” whenever necessary to ensure effective communication with individuals with disabilities. For purposes of this policy, “individuals with disabilities” includes persons that have disabilities with vision, hearing, and/or speech.

II. Requests for Auxiliary Aids and Services

When the Bank is notified that an auxiliary aid or service has been requested, the Bank’s team members will confer with the person with the disability (and if that is not feasible, will confer with the requestor) to ascertain the circumstances, requirements, and preferences of the individual with the disability. The Bank will respond promptly to requests for auxiliary aids and services to ensure that delays in responding do not deny individuals with disabilities an equal opportunity to participate in, and benefit from, the Bank’s services. Documentation of disability will generally not be requested or required. All instances of requests for auxiliary aids or services should be escalated to Branch Administration at ADARRequests@cbna.com for assistance in determining how to proceed. To do so, please complete pform O-154 and attach via email.

III. Determining Types of Auxiliary Aids and Services

The determination of which appropriate auxiliary aids and services are necessary and the timing, duration, and frequency with which they are provided, in order to ensure effective communication, will be made by the Bank. Where possible, the Bank will make the determination in consultation with the individual who has a disability, based on an individualized assessment. The assessment will take into account all relevant facts and circumstances, including without limitation the following:

- The nature, length, and importance of the communication at issue
- The individual's communication skills and knowledge
- The individual's request or statement of need for a specific auxiliary aid or service (for example: interpreter, large-print statements)
- The availability at the required times of appropriate auxiliary aids and services, including qualified sign language or oral interpreters

Before determining the type of interpreting service (or other auxiliary aid or service) to be secured, the Bank will consult with the individual requiring interpreter service (or other auxiliary aid or service) and recognize his or her preferred mode of communication (for example, American Sign Language, Signed English, oral

interpreting, large print, Braille, or accessible electronic format). In determining what types of auxiliary aids or services are necessary, the Bank will give consideration to the requests of the individual.

Some example situations involving auxiliary aids and services, as well as examples of appropriate aids and services, are described below in the section entitled “Definitions and Examples”.

IV. Accepting Requests

Requests for auxiliary aids or services can be made by an individual with a disability who needs the auxiliary aids or services, or by someone acting on that individual's behalf. Requests can be made orally or in writing.

The Bank may ask that requests for interpreters be made in advance, whenever possible, to better enable the Bank to address the communication needs of the individual. However, all requests for auxiliary aids and services will be addressed promptly and in accordance with ADA requirements.

V. Possible Decision to Deny Request

If, after consulting with an individual requesting auxiliary aids or services and discussing with Branch Administration, the Bank believes auxiliary aids or services should be denied, or that an auxiliary aid or service different than that requested should be provided, then the Bank will communicate its determination to the individual.

If the Bank denies a request because providing the requested aid or service would result in a fundamental alteration or undue burden, the Bank will provide an alternative auxiliary aid or service, if one exists, that would not result in such alteration or burden but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the services offered by the Bank. Records will be created and retained detailing the reasons for denying the originally requested auxiliary aid or service or providing an aid or service different than that requested.

VI. Friends and Family Members

The Bank's team members may not ask or require friends or family members to interpret for individuals who are deaf, are hard of hearing, or have speech disabilities, because a family member or friend may not be qualified to render the necessary interpretation due to factors such as professional or personal involvement. Where the individual with a disability specifically requests that an accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances, the Bank will permit such assistance.

VII. Cost

The Bank will not charge or ask individuals with disabilities to pay for the cost of an auxiliary aid or service needed for effective communication.

VIII. Procedure / Policy Questions

If you have any questions regarding this policy, or the provision of auxiliary aids and services under Title III of the Americans with Disabilities Act, you should contact Branch Administration at ADARRequests@cbna.com.

IX. Definitions and Examples

Appropriate Auxiliary Aids and Services. Appropriate auxiliary aids and services include a wide variety of equipment, materials, and personal services that may be necessary to ensure effective communication for individuals with disabilities. Appropriate auxiliary aids and services could include:

- For people who are blind, have vision loss, or are deaf-blind, this includes providing a qualified reader, information in large print, braille, or audio recording. A “qualified” reader means someone who is able to read effectively, accurately, and impartially, using any necessary specialized vocabulary.
- For people who are deaf, have hearing loss, or are deaf-blind, this includes providing a qualified note taker, a qualified sign language interpreter, oral written materials, real-time captioning; or a printed script of a stock speech. A “qualified” interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with disability is saying) and expressively (i.e., having the skill needed to convey information back to that person) using any necessary specialized vocabulary.
- For people who have speech disabilities, this may include qualified interpreters on-site or through video remote interpreting services, note takers, real-time computer-aided transcription services, written materials, and exchange of written notes.

Fundamental Alteration. A "fundamental alteration" is a modification that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered.

Qualified Interpreter. A "qualified interpreter" means an interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Qualified interpreters include, for example, sign language interpreters, oral transliterators, and cued-language transliterators.

Specialized terminology necessary for effective communication with an individual who is deaf or hard of hearing or who has a speech disability needs to consider that individual's language skills and education. Not all interpreters are qualified for all situations. For example:

- An interpreter who is qualified to interpret using American Sign Language (ASL) is not necessarily qualified to interpret orally.
- Someone who has only a rudimentary familiarity with sign language or finger spelling is not a "qualified sign language interpreter."
- Someone who is fluent in sign language but who does not possess the ability to process spoken communication into the proper signs or to observe someone signing and translate their signed or finger-spelled communication into spoken words is not a "qualified sign language interpreter."
- An interpreter who knows tactile interpreting may be the only interpreter who is qualified to interpret for someone who is both deaf and blind.

Although an interpreter may be certified, a certified interpreter is not necessarily "qualified." Similarly, certification is not required in order for an interpreter to be "qualified."

Qualified Reader. A "qualified reader" means a person who is able to read effectively, accurately, and impartially using any necessary specialized vocabulary.

Undue Burden. "Undue burden" means significant difficulty or expense. In determining whether an action would result in an undue burden, factors to be considered include:

- The nature and cost of the action needed
- The overall financial resources of the site or sites involved in the action; the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements that are

necessary for safe operation, including crime prevention measures; or the impact otherwise of the action upon the operation of the site

- The geographic separateness, and the administrative or fiscal relationship of the site or sites in question to any parent corporation or entity
- If applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees; the number, type, and location of its facilities
- If applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity

Video Remote Interpreting. "Video remote interpreting (VRI) service" means an interpreting service that uses video conference technology over dedicated lines or wireless technology offering high speed, high bandwidth video connection that delivers high-quality video images meeting the following requirements:

- Real-time, full motion video and audio over a dedicated high-speed, wide bandwidth video connection or wireless connection that delivers high-quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication
- A sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the participating individual's face, arms hands, and fingers, regardless of his or her body position
- A clear, audible transmission of voices
- Adequate training for users of the technology and other involved individuals so that they may quickly and efficiently set up and operate the VRI

Examples: When An Auxiliary Aid or Service is Needed

Examples of situations where auxiliary aids and services might be needed include the following:

A Bank team member will be doing a presentation to the employees of a large corporate client regarding account offerings. A person who is deaf requests an interpreter. The Bank would generally be required to provide such an interpreter. The Bank would also be required to provide assistive listening devices for these who are hard of hearing. Finally, the Bank would have an obligation to provide its written materials in alternative formats (for example, large print or audio description) for those who are blind or have low vision.

A customer who is deaf enters a branch and asks for an interpreter to discuss mortgage products. The Bank is generally required to provide such an interpreter. When making the arrangements, however, the Bank finds that the closest available interpreter is two hours away and isn't available to travel until later that afternoon. The Bank should consult with the customer to determine if he/she would like to wait for the interpreter, or would prefer to make a scheduled appointment for a future time to allow for pre-arrangement of interpreting services.

Example: When a Different Auxiliary Aid or Service May be Appropriate

An example of a situation when the Bank might provide a different auxiliary aid or service - other than what was requested - could be the following:

A customer who enters the same branch every week to deposit his or her paycheck, and makes no other transactions, requests an interpreter for each such visit. The Bank may decline to provide the interpreter and may offer to communicate via written notes instead, so long as effective communication is ensured. Please consider that a request for an interpreter in this situation may indicate a need to discuss a topic that cannot be handled through the exchange of written notes.

X. Policy Review and Administration

This policy will be reviewed annually by the Chief Compliance Officer and approved by the Compliance Committee. The policy will be reviewed by the Board every three years or sooner if there are any material changes.

Administration of this policy will be the responsibility of the Branch Services Administrator (or his/her designee). This includes establishing procedures to ensure ongoing compliance with this policy.

XI. Training

Training on this policy will be delivered to customer-facing personnel (as determined by Human Resources in coordination with Legal) at least annually, or at other intervals as determined by the Chief Compliance Officer and Compliance Committee.