

# **PUBLIC DISCLOSURE**

**May 16, 2022**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**The Central Trust Bank  
RSSD #853952**

**238 Madison Street  
Jefferson City, Missouri 65101**

**Federal Reserve Bank of St. Louis**

**P.O. Box 442  
St. Louis, Missouri 63166-0442**

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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**INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.**

The following table shows the performance level of The Central Trust Bank with respect to the Lending, Investment, and Service Tests.

| <b>THE CENTRAL TRUST BANK</b> |                          |                        |                     |
|-------------------------------|--------------------------|------------------------|---------------------|
| <b>Performance Levels</b>     | <b>Performance Tests</b> |                        |                     |
|                               | <b>Lending Test*</b>     | <b>Investment Test</b> | <b>Service Test</b> |
| Outstanding                   |                          |                        |                     |
| High Satisfactory             | X                        |                        | X                   |
| Low Satisfactory              |                          | X                      |                     |
| Needs to Improve              |                          |                        |                     |
| Substantial Noncompliance     |                          |                        |                     |

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at overall ratings.

The major factors supporting the institution's rating include:

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment areas.
- A high percentage of the bank's loans were made in the assessment areas.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly low- and moderate-income (LMI) geographies and/or LMI individuals.
- Record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of community development services.

## DESCRIPTION OF INSTITUTION

The Central Trust Bank is a large, interstate retail bank offering both consumer and commercial loan and deposit products. The bank is headquartered in Jefferson City, Missouri, and is wholly owned by Central Bancompany, Inc., also headquartered in Jefferson City, Missouri. The bank has 25 domestic entities, finance companies, securities brokers/dealers, and data processing centers, which are not material with regard to consumer compliance. None of the bank's subsidiaries are credit granting. The bank is a full-service financial institution offering an array of commercial and consumer loan and deposit products across a branch network consisting of 154 branches, including the main office, across five states. The bank's most significant presence is in its home state of Missouri, specifically in its Jefferson City metropolitan statistical area (MSA) assessment area where the largest number of its branches, deposits, and loans are held.

As of the previous evaluation on October 1, 2018, The Central Trust Bank operated 13 branches in two assessment areas in the state of Missouri. It was affiliated with 12 other Central Bancompany, Inc., subsidiary banks that were headquartered throughout Missouri and Oklahoma. Since that time, the holding company consolidated its 13 subsidiary banks into one charter, designating The Central Trust Bank as the surviving bank. Through this merger with its affiliate banks, effective October 1, 2021, the bank added eight assessment areas and 138 branches. Subsequently, the bank opened three branches in three markets in Colorado, increasing the total number of assessment areas to 13. For purposes of this evaluation, two of the contiguous assessment areas with similar economic and demographic characteristics were combined for analysis, resulting in 12 assessment areas reviewed. The composition of each assessment area, including assessment areas that were combined for analysis, is detailed in the *General Demographics* section for each separate assessment area. The 12 assessment areas are listed below:

- Jefferson City, Missouri MSA (Jefferson City)
- Springfield, Missouri MSA (Springfield)
- Mid-Missouri nonMSA (Mid-Missouri)
- Columbia, Missouri MSA (Columbia)
- Branson, Missouri nonMSA (Branson)
- Kansas City, Missouri – Kansas – Lawrence, Kansas Combined Multistate MSA (Kansas City)
- St. Louis, Missouri – Illinois Multistate MSA (St. Louis)
- Tulsa, Oklahoma MSA (Tulsa)
- Oklahoma City, Oklahoma MSA (Oklahoma City)
- Colorado Springs, Colorado MSA (Colorado Springs)
- Denver, Colorado MSA (Denver)
- Durango, Colorado nonMSA (Durango)

The following table details the changes in the bank's branch network by assessment area since The Central Trust Bank's previous evaluation on October 1, 2018, as well as changes to its affiliates' branch networks completed after the affiliates' previous evaluation and prior to the merger.

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| The Central Trust Bank Branch Activity |  |                    |                    |   |                                       |                    |                    |                     |
|--|--|--------------------|--------------------|---|---------------------------------------|--------------------|--------------------|---------------------|
| Assessment Area                        | Affiliate Activity<br>(Previous Evaluation through<br>October 1, 2021) |                    |                    | Bank Activity<br>(October 1, 2018 through May 15, 2022) |                                       |                    |                    |                     |
|  | Branches at<br>Previous<br>Evaluation                                  | Branches<br>Opened | Branches<br>Closed | Branches<br>Acquired<br>through<br>Merger               | Branches<br>at Previous<br>Evaluation | Branches<br>Opened | Branches<br>Closed | Current<br>Branches |
| Jefferson City                         | 4  | -                  | -                  | 4   | 12                                    | -                  | -                  | 16                  |
| Springfield                            | 22   | 1                  | 2                  | 21  | -                                     | -                  | -                  | 21                  |
| Mid-Missouri                           | 21   | -                  | 1                  | 20  | 1                                     | -                  | 1                  | 20                  |
| Columbia                               | 15   | -                  | -                  | 15  | -                                     | -                  | -                  | 15                  |
| Branson                                | 5  | -                  | -                  | 5   | -                                     | -                  | -                  | 5                   |
| Kansas City                            | 52   | -                  | 3                  | 49  | -                                     | -                  | -                  | 49                  |
| St. Louis                              | 15   | 1                  | -                  | 16  | -                                     | -                  | -                  | 16                  |
| Tulsa                                  | 6  | -                  | -                  | 6   | -                                     | -                  | -                  | 6                   |
| Oklahoma                               | 1  | 1                  | -                  | 2   | -                                     | 1                  | -                  | 3                   |
| Colorado Springs                       | -  | -                  | -                  | -   | -                                     | 1                  | -                  | 1                   |
| Denver                                 | -  | -                  | -                  | -   | -                                     | 1                  | -                  | 1                   |
| Durango                                | -  | -                  | -                  | -   | -                                     | 1                  | -                  | 1                   |
| <b>TOTAL</b>                           | <b>141</b>   | <b>3</b>           | <b>6</b>           | <b>138</b>  | <b>13</b>                             | <b>4</b>           | <b>1</b>           | <b>154</b>          |

In addition to the branch locations shown in the table above, the bank also operates 84 stand-alone automated teller machines (ATMs), four stand-alone interactive teller machines (ITMs), and 10 loan production offices (LPOs). All but two stand-alone ATMs and ITMs are located in the bank's Missouri and Kansas City assessment areas. The remaining two are located in the St. Louis assessment area. The bank maintains five of its LPOs outside of its assessment areas and five within its Missouri, Kansas City, and St. Louis assessment areas.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers. As such, the bank appears capable of meeting the credit needs of its assessment areas based on its available resources and financial products and services. As of March 31, 2022, the bank reported total assets of \$19.9 billion. As of the same date, loans and leases outstanding were \$10.4 billion (52.6 percent of total assets), and deposits totaled \$15.9 billion. The bank's loan portfolio composition by credit category is displayed in the following table:

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| <b>Distribution of Total Loans as of March 31, 2022</b> |                         |                                  |
|---|-------------------------|----------------------------------|
| <b>Credit Category</b>                                  | <b>Amount (\$ 000s)</b> | <b>Percentage of Total Loans</b> |
| Commercial Real Estate                                  | \$3,480,994             | 33.5%                            |
| 1–4 Family Residential                                  | \$1,983,965             | 19.1%                            |
| Commercial and Industrial                               | \$1,438,858             | 13.8%                            |
| Loans to Individuals                                    | \$1,041,652             | 10.0%                            |
| Construction and Development                            | \$908,460               | 8.7%                             |
| Multifamily Residential                                 | \$808,145               | 7.8%                             |
| Total Other Loans                                       | \$401,715               | 3.9%                             |
| Farmland  | \$277,005               | 2.7%                             |
| Farm Loans  | \$64,686                | 0.6%                             |
| <b>TOTAL</b>  | <b>\$10,405,480</b>     | <b>100%</b>                      |

The table shows that a significant portion of the bank’s lending resources is directed to commercial real estate loans, loans secured by 1–4 family residential properties, and commercial and industrial loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. Given the subsequent sale of these loans on the secondary market, this activity would not be captured in the table.

While farmland and farm loans do not represent a significant portion of the bank’s loan portfolio by dollar volume, these products are nevertheless an important product line in several of the bank’s assessment areas and are thus included for review where applicable.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on October 1, 2018.

## **SCOPE OF EXAMINATION**

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) large bank procedures, which entail three performance tests: the Lending Test, Investment Test, and Service Test. The bank’s performance under these tests is rated at the institution level, as well as by state and multistate MSA. For this evaluation, the bank received a rating for three states and two multistate MSAs, along with an overall institution rating. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. The rated areas are listed in order of significance towards the overall institution rating. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2021.

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| State/Multistate<br>MSA | Offices    |             | Deposits as of<br>June 30, 2021 |             | Assessment Area Reviews |                  |           |
|-------------------------|------------|-------------|---------------------------------|-------------|-------------------------|------------------|-----------|
|                         | #          | %           | \$ (000s)                       | %           | Full<br>Scope           | Limited<br>Scope | TOTAL     |
| Missouri                | 77         | 50.0%       | 9,484,341                       | 62.0%       | 2                       | 3                | 5         |
| Kansas City             | 49         | 31.8%       | 3,391,976                       | 22.2%       | 1                       | -                | 1         |
| St. Louis               | 16         | 10.4%       | 1,812,063                       | 11.8%       | 1                       | -                | 1         |
| Oklahoma                | 9          | 5.8%        | 595,595                         | 3.9%        | 1                       | 1                | 2         |
| Colorado                | 3          | 1.9%        | 14,271                          | 0.1%        | 1                       | 2                | 3         |
| <b>OVERALL</b>          | <b>154</b> | <b>100%</b> | <b>\$13,619,382</b>             | <b>100%</b> | <b>6</b>                | <b>6</b>         | <b>12</b> |

The bank's overall institution rating is a composite of these five rated areas, which are weighted according to the significance of the bank's operations in each area. Based on branch structure and loan and deposit activity, primary emphasis (in order of significance) was placed on performance in the state of Missouri, Kansas City, and St. Louis. As a combined group, these three rated areas represent 82.2 percent of the bank's total branches and 96.0 percent of total deposits.

### Lending Test

Under the Lending Test, the bank's performance is evaluated using specific criteria and time periods that cover lending activity since the prior CRA examination. Once evaluated, lending activity may not be used in any other CRA examination. To uphold this requirement, the period of time used to conduct the Lending Test varies by assessment area, according to the applicable affiliate's most recent CRA examination. Further, data sources used in this test vary by assessment area as four of the affiliate banks were not CRA and/or Home Mortgage Disclosure Act (HMDA) data reporters at the time of the most recent performance evaluation. The below set of charts identifies the time periods used for each assessment area in this evaluation.

| Lending Test<br>Performance Criterion    | Products Selected for Review  |
|--|---|
| Level of Lending Activity                | <ul style="list-style-type: none"> <li>Loans reportable under the HMDA</li> <li>Small business and small farm loans reportable under the CRA</li> </ul> |
| Assessment Area Concentration            |   |
| Loan Distribution by Borrower's Profile  |   |
| Geographic Distribution of Loans         |   |
| Community Development Lending Activities |   |
| Product Innovation <sup>1</sup>          |   |

<sup>1</sup> Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.



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| Assessment Area  | Time Periods Used for Lending Test   |   |
|------------------|--|---|
|                  | Small Business, HMDA, and Small Farm Lending   | Community Development Activities  |
| Jefferson City   | 1/1/2019 – 12/31/2020  | 10/1/2018 – 12/31/2021  |
| Springfield      | 1/1/2019 – 12/31/2020  | 10/1/2018 – 12/31/2021  |
| Mid-Missouri     | <ul style="list-style-type: none"> <li>1/1/2020 – 12/31/2020 (Pettis, Randolph, and Audrain Counties)</li> <li>1/1/2019 – 12/31/2020 (Camden, Miller, Morgan, and Johnson Counties)</li> </ul> | <ul style="list-style-type: none"> <li>11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties)</li> <li>7/27/2020 – 12/31/2021 (Pettis County)</li> <li>10/7/2020 – 12/31/2021 (Randolph and Audrain Counties)</li> <li>10/1/2018 – 12/31/2021 (Johnson County)</li> </ul> |
| Columbia         | 1/1/2020 – 12/31/2020  | 12/6/2020 – 12/31/2021  |
| Branson          | 1/1/2019 – 12/31/2020  | 7/15/2019 – 12/31/2021  |
| Kansas City      | 1/1/2020 – 12/31/2020  | 11/2/2020 – 12/31/2021  |
| St. Louis        | 1/1/2019 – 12/31/2020  | 10/1/2018 – 12/31/2021  |
| Tulsa            | 1/1/2019 – 12/31/2020  | 3/11/2019 – 12/31/2021  |
| Oklahoma City    | 1/1/2019 – 12/31/2020  | 3/11/2019 – 12/31/2021  |
| Colorado Springs | 1/1/2019 – 12/31/2020  | 10/18/2018 – 12/31/2021   |
| Denver           | 1/1/2019 – 2/25/2020   | 2/25/2020 – 12/31/2021  |
| Durango          | 1/1/2019 – 12/31/2020  | 5/21/2021 – 12/31/2021  |

As previously described, HMDA, small business, and small farm loans are used to evaluate the bank's lending performance. Given the bank's strategic focus on commercial and residential real estate lending, along with needs noted by community contacts, small business and HMDA loans are generally given more weight than small farm loans. When possible, equal emphasis is placed on performance in 2019 and 2020, though adjustments to this weighting are made according to exceptional circumstances, such as the limitations on data as identified in the table above and the unique circumstances surrounding COVID-19 that impacted 2020 data.

Under the Lending Test criteria previously noted, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation:

- Assessment area demographics are based on 2015 American Community Survey (ACS) data, and business demographics are based on 2019 and 2020 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC's 2019 and 2020 annual estimates. The 2020 estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.
- Industry demographics are sourced from the 2020 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.
- Unemployment data is sourced from the U.S. Department of Labor, Bureau of Labor Statistics and is not seasonally adjusted.

- In order to evaluate the bank's lending performance to borrowers of different income levels, borrowers are classified as low-, moderate-, middle-, or upper-income. In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses and farms of different revenue sizes, the demographic figure refers to the percentage of families in that assessment area who are classified as either low or moderate income or the percentage of businesses and farms with annual revenues of \$1 million or less.
- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units in that assessment area that are located in either low- or moderate-income census tracts or the percentage of businesses and farms located in LMI census tracts.

When analyzing bank performance, greater emphasis is placed on annually updated aggregate lending data, which is expected to describe many factors impacting lenders and to predict more relevant comparisons.

### **Investment Test**

The Investment Test considers community development investments, including grants and donations, made since the previous CRA examination. In addition, investments made prior to the date of the previous CRA examination, but still outstanding as of this review date, are considered. As with the Lending Test, the time periods used for the Investment Test varied by assessment area, according to the applicable affiliate's prior CRA examination as identified below.

| <b>Assessment Area</b> | <b>Time Periods</b>   |
|------------------------|---|
| Jefferson City         | 10/1/2018 – 12/31/2021  |
| Springfield            | 10/1/2018 – 12/31/2021  |
| Mid-Missouri           | <ul style="list-style-type: none"> <li>• 11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties)</li> <li>• 7/27/2020 – 12/31/2021 (Pettis County)</li> <li>• 10/7/2020 – 12/31/2021 (Randolph and Audrain Counties)</li> <li>• 10/1/2018 – 12/31/2021 (Johnson County)</li> </ul> |
| Columbia               | 12/6/2020 – 12/31/2021  |
| Branson                | 7/15/2019 – 12/31/2021  |
| Kansas City            | 11/2/2020 – 12/31/2021  |
| St. Louis              | 10/1/2018 – 12/31/2021  |
| Tulsa                  | 3/11/2019 – 12/31/2021  |
| Oklahoma City          | 3/11/2019 – 12/31/2021  |
| Colorado Springs       | 10/18/2018 – 12/31/2021   |
| Denver                 | 2/25/2020 – 12/31/2021  |
| Durango                | 5/21/2021 – 12/31/2021  |

Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

**Service Test**

The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

The review period for retail and community development services includes activity from the date of the previous CRA evaluation to the date of the current evaluation. As with the Lending and Investment Tests, the time periods used for this test vary by assessment area, according to the applicable affiliate's prior CRA examination as identified below.

| Assessment Area  | Time Periods  |   |
|------------------|---|---|
|                  | Community Development Services  | Retail Services   |
| Jefferson City   | 10/1/2018 – 12/31/2021  | 10/1/2018 – 5/16/2022   |
| Springfield      | 10/1/2018 – 12/31/2021  | 10/1/2018 – 5/16/2022   |
| Mid-Missouri     | <ul style="list-style-type: none"> <li>• 11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties)</li> <li>• 7/27/2020 – 12/31/2021 (Pettis County)</li> <li>• 10/7/2020 – 12/31/2021 (Randolph and Audrain Counties)</li> <li>• 10/1/2018 – 12/31/2021 (Johnson County)</li> </ul> | <ul style="list-style-type: none"> <li>• 11/5/2018 – 5/16/2022 (Camden, Miller, and Morgan Counties)</li> <li>• 7/27/2020 – 5/16/2022 (Pettis County)</li> <li>• 10/7/2020 – 5/16/2022 (Randolph and Audrain Counties)</li> <li>• 10/1/2018 – 5/16/2022 (Johnson County)</li> </ul> |
| Columbia         | 12/6/2020 – 12/31/2021  | 12/6/2020 – 5/16/2022   |
| Branson          | 7/15/2019 – 12/31/2021  | 7/15/2019 – 5/16/2022   |
| Kansas City      | 11/2/2020 – 12/31/2021  | 11/2/2020 – 5/16/2022   |
| St. Louis        | 10/1/2018 – 12/31/2021  | 10/1/2018 – 5/16/2022   |
| Tulsa            | 3/11/2019 – 12/31/2021  | 3/11/2019 – 5/16/2022   |
| Oklahoma City    | 3/11/2019 – 12/31/2021  | 3/11/2019 – 5/16/2022   |
| Colorado Springs | 10/18/2018 – 12/31/2021   | 10/18/2018 – 5/16/2022  |
| Denver           | 2/25/2020 – 12/31/2021  | 2/25/2020 – 5/16/2022   |
| Durango          | 5/21/2021 – 12/31/2021  | 5/21/2021 – 5/16/2022   |

**Community Contacts**

To augment this evaluation, nine community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions in the bank's assessment areas. These interviews were conducted with knowledgeable individuals residing or conducting business in the assessment areas. Key details from these interviews are included in the *Description of Assessment Area* section, applicable to the assessment area for which they were conducted.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The Central Trust Bank's performance under the Lending Test is rated High Satisfactory. The rating reflects an aggregation of the ratings for each rated area shown in the table below, with Missouri, Kansas City, and St. Louis carrying the most weight toward the overall rating. The bank's performance under each of the criteria of the Lending Test are shown in the tables that follow.

| Rated Area     | Lending Activity         |
|----------------|--------------------------|
| Missouri       | High Satisfactory        |
| Kansas City    | High Satisfactory        |
| St. Louis      | High Satisfactory        |
| Oklahoma       | Low Satisfactory         |
| Colorado       | Low Satisfactory         |
| <b>OVERALL</b> | <b>High Satisfactory</b> |

### Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas.

| Lending Inside and Outside of Assessment Areas (\$ 000s) |                         |              |                          |              |                    |             |
|--|-------------------------|--------------|--------------------------|--------------|--------------------|-------------|
| January 1, 2019 through December 31, 2020                |                         |              |                          |              |                    |             |
| Loan Type  | Inside Assessment Areas |              | Outside Assessment Areas |              | TOTAL              |             |
| HMDA   | 14,897                  | 81.3%        | 3,426                    | 18.7%        | <b>18,323</b>      | <b>100%</b> |
|  | \$3,417,625             | 78.3%        | \$949,231                | 21.7%        | <b>\$4,366,857</b> | <b>100%</b> |
| Small Business   | 20,228                  | 93.3%        | 1,442                    | 6.7%         | <b>21,670</b>      | <b>100%</b> |
|  | \$2,091,369             | 91.7%        | \$189,235                | 8.3%         | <b>\$2,280,604</b> | <b>100%</b> |
| Small Farm Loans   | 2,734                   | 83.0%        | 560                      | 17.0%        | <b>3,294</b>       | <b>100%</b> |
|  | \$191,877               | 83.7%        | \$37,490                 | 16.3%        | <b>\$229,367</b>   | <b>100%</b> |
| <b>TOTAL LOANS</b>                                       | <b>37,859</b>           | <b>87.5%</b> | <b>5,428</b>             | <b>12.5%</b> | <b>43,287</b>      | <b>100%</b> |
|  | <b>\$5,700,872</b>      | <b>82.9%</b> | <b>\$1,175,956</b>       | <b>17.1%</b> | <b>\$6,876,828</b> | <b>100%</b> |

A high percentage of loans were made in the bank's assessment areas. As shown above, 87.5 percent of the total loans were made inside the assessment areas, accounting for 82.9 percent of the dollar volume of total loans.

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### **Lending Activity**

| <b>Rated Area</b> | <b>Lending Activity</b> |
|-------------------|-------------------------|
| Missouri          | Excellent               |
| Kansas City       | Adequate                |
| St. Louis         | Excellent               |
| Oklahoma          | Good                    |
| Colorado          | Good                    |
| <b>OVERALL</b>    | <b>EXCELLENT</b>        |

Overall lending levels reflect excellent responsiveness to the credit needs of the bank's assessment areas. This conclusion is driven by performance in Missouri and St. Louis. The total number and dollar amount of loans were considered in arriving at lending activity conclusions, in addition to competitive factors and the bank's overall market share in the area. Additional details are discussed later for each assessment area reviewed under full-scope procedures.

### **Borrower and Geographic Distribution**

Overall, performance by borrower's income or revenue profile is good, as shown in the following table.

| <b>Rated Area</b> | <b>Loan Distribution by Borrower's Profile</b> |
|-------------------|--|
| Missouri          | Good   |
| Kansas City       | Good   |
| St. Louis         | Good   |
| Oklahoma          | Adequate                                       |
| Colorado          | Good   |
| <b>OVERALL</b>    | <b>GOOD</b>                                    |

The overall geographic distribution of loans reflects good penetration throughout the assessment areas, as displayed below.

| <b>Rated Area</b> | <b>Geographic Distribution of Loans</b> |
|-------------------|---|
| Missouri          | Good                                    |
| Kansas City       | Good                                    |
| St. Louis         | Adequate                                |
| Oklahoma          | Good                                    |
| Colorado          | Adequate                                |
| <b>OVERALL</b>    | <b>GOOD</b>                             |

The bank's geographic distribution of loans varied slightly between rated areas and is considered good overall, primarily driven by performance in Missouri and Kansas City.

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### **Community Development Lending Activity**

The bank makes a relatively high level of community development loans, as shown in the table below.

| <b>Rated Area</b> | <b>Community Development Lending Activity</b> |
|-------------------|---|
| Missouri          | Leader  |
| Kansas City       | Adequate                                      |
| St. Louis         | Relatively High                               |
| Oklahoma          | Adequate                                      |
| Colorado          | Low Level                                     |
| <b>OVERALL</b>    | <b>RELATIVELY HIGH</b>                        |

The overall performance conclusion is driven by Missouri, Kansas City, and St. Louis. Collectively, performance balances to a relatively high level. The bank made 182 qualified community development loans totaling \$217.5 million throughout its assessment areas. Included in these numbers are 38 Paycheck Protection Program (PPP) loans, totaling \$25.5 million, that had a community development purpose. These loans made to small businesses impacted by the COVID-19 pandemic (the pandemic) in 2020 helped to support and retain LMI jobs (see the *Product Innovation* section that follows for more information).

### **Product Innovation**

The Central Trust Bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.

| <b>Rated Area</b> | <b>Use of Product Innovation</b> |
|-------------------|----------------------------------|
| Missouri          | Makes extensive use              |
| Kansas City       | Makes extensive use              |
| St. Louis         | Makes extensive use              |
| Oklahoma          | Limited use                      |
| Colorado          | Limited use                      |
| <b>OVERALL</b>    | <b>MAKES EXTENSIVE USE</b>       |

Performance in Missouri, Kansas City, and St. Louis drives the overall performance conclusion. Following are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period, listed in order of uniqueness.

- **Home Turf Program**: The bank created this program specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas. Initially offered in Kansas City only, the bank expanded the reach of this program to include St. Louis and more recently, Colorado Springs. Through this program, eligible borrowers are allowed to make a reduced minimum down payment of 3.0 percent, using the borrowers' personal funds, government assistance programs, or a gift from a relative. From January 1, 2019, through December 31, 2021, the bank originated 439 mortgage loans under this program, totaling \$59.2 million in its Kansas City, St. Louis, and Colorado Springs assessment areas.

- Missouri Housing Development Commission Loan Program: This program helps with closing cost and down payment assistance for LMI families. From 2019 through 2021, the bank originated 148 loans, totaling \$17.8 million, primarily in its Missouri, Kansas City, and St. Louis assessment areas.
- Federal Home Loan Bank (FHLB) of Des Moines HomeStart Plus Program: This FHLB assistance program provides down payment assistance to LMI individuals funded through direct subsidies from member banks. The bank provided direct subsidies totaling \$2.8 million on 30 mortgage loans through this program in its Missouri assessment areas from 2019 through 2021.
- Small Business Administration (SBA) Loan Programs: As an approved financial institution, the bank participates in two SBA loan programs, the SBA-Certified Development Company (CDC)/504 Loan Program and the SBA 7(a) Loan Program. Through these programs, the bank offers loans that support small business operations and/or expansion. From 2019 through 2021, the bank originated a total of 149 loans totaling \$63.9 million in its Missouri, Kansas City, and St. Louis assessment areas.
- Fannie Mae HomeReady Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. From 2019 through 2021, the bank originated a total of 463 loans, totaling \$78.9 million, both inside and outside of its assessment areas.
- Freddie Mac HomePossible Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. From 2019 through 2021, the bank originated a total of 47 loans, totaling \$7.9 million, both inside and outside of its assessment areas.
- Farmer Mac Farm Credit System Loan Program: This program offers flexible terms and makes loans available to farmers and ranchers to allow them to improve operations and increase productivity. The bank originated seven loans totaling \$3.0 million from 2019 through 2021.
- U.S. Department of Agriculture (USDA) Programs: The USDA offers loan programs, including the Farm Service Agency (FSA) and Rural Development (RD) that are designed to assist farmers and ranchers obtain the financing needed to start, expand, or maintain a family farm. From 2019 to 2021, the bank originated 63 loans totaling \$29.6 million through these programs.
- Veterans Affairs (VA) Loan Program: This program, which is offered to veterans, provides flexible, long-term home financing to eligible borrowers with low or no down payments. The bank originated 1,175 loans totaling \$402.1 million from 2019 to 2021.

- Federal Housing Administration (FHA) Loan Program: This program offers flexible, long-term financing to eligible borrowers and has lower down payment and credit score requirements. From 2019 to 2021, the bank originated 1,038 loans totaling \$207.8 million, both in and outside of its assessment areas.
- USDA, RD Home Loans: This loan program is designed to assist LMI individuals in purchasing affordable housing in rural areas. There are no down payment requirements. During the review period, the bank originated 510 RD home loans totaling \$77.9 million.

### **Activities in Response to the COVID-19 Pandemic**

Pursuant to the joint statements issued by the federal financial institution regulatory agencies and state bank regulators in March 2020, retail banking services and retail lending activities that are responsive to the needs of LMI individuals, small businesses, and small farms affected by COVID-19 are given favorable consideration under the CRA. A summary of each of the bank's retail lending activities taken in response to the pandemic follows:

- SBA PPP: PPP loans are available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. The Central Trust Bank took quick, extensive measures to put new systems and processes in place to offer these loans. From 2020 through 2021, the bank originated 17,047 PPP loans totaling \$1.3 billion across the nation, with a significant majority of these loans originated in its assessment areas. According to metrics provided by the SBA, by number of originations, the bank ranked 66<sup>th</sup> (2020) and 73<sup>rd</sup> (2021) out of the over 4,500 lenders that participated in the program. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- Loan Forbearance and Modification Programs: Consideration was given to financial institutions offering payment accommodations, such as loan forbearance or payment modification plans, to consumer and commercial borrowers impacted by the pandemic. These activities had a significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues and eased cash flow pressures on businesses impacted by the pandemic. For consumer borrowers, The Central Trust Bank maintained an average of 537 mortgage loan accommodations, including forbearances and payment plans, between May 2020 and May 2021. For commercial borrowers, a significant number of loan deferrals were offered between April 2020 and October 2020, peaking at 2,195 loan deferrals in June 2020.



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Overall, the bank is rated Low Satisfactory under the Investment Test. Though the bank makes a significant level of community development investments and grants in two of its major assessment areas, it makes adequate and poor levels in its three other areas, driving the rating down to Low Satisfactory. The following table provides details on the total dollar volume of qualified community development investments, grants, and donations and the overall Investment Test rating for each rated area.

| Multistate MSA/State | Investments (\$)      | Donations/Grants (\$) | Investment Test Rating  |
|----------------------|-----------------------|-----------------------|-------------------------|
| Missouri             | \$21.2 million        | \$1,096,837           | High Satisfactory       |
| Kansas City          | \$5.9 million         | \$386,250             | Low Satisfactory        |
| St. Louis            | \$8.8 million         | \$217,550             | High Satisfactory       |
| Oklahoma             | \$1.7 million         | \$83,380              | Low Satisfactory        |
| Colorado             | -                     | \$5,000               | Needs to Improve        |
| <b>TOTAL</b>         | <b>\$37.7 million</b> | <b>\$1,789,017</b>    | <b>LOW SATISFACTORY</b> |

The \$37.7 million in investments largely consisted of mortgage-backed securities (MBS) made up of affordable housing loans to LMI borrowers, and municipal bonds that benefitted schools or municipal infrastructure projects in LMI areas in the bank's assessment areas. They included investments made in a prior period but still outstanding as of the date of this evaluation as well as investments made to broader statewide areas. Investments benefitting more than one of the bank's assessment areas within a state are detailed in the respective statewide section. Additional details of the bank's investment and donation/grant activity are discussed later in the evaluation of each rated area and assessment area.

## SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. Of the four criteria assessed in the Service Test, greater emphasis is placed on the level of community development services provided by the bank. Service Test ratings by rated area are shown in the table below, with performance under each of the four Service Test criteria detailed in the tables that follow.

| Rated Area     | Service Test Rating      |
|----------------|--------------------------|
| Missouri       | High Satisfactory        |
| Kansas City    | Low Satisfactory         |
| St. Louis      | High Satisfactory        |
| Oklahoma       | Low Satisfactory         |
| Colorado       | High Satisfactory        |
| <b>OVERALL</b> | <b>HIGH SATISFACTORY</b> |

While there is some variance in the bank's performance by rated area, the Service Test is rated High Satisfactory in three of its assessment areas; two of which are among those that are given the most weight in this evaluation (Missouri and St. Louis). Therefore, overall performance is High Satisfactory.

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### **Accessibility of Delivery Systems**

Overall, the bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels in the bank's assessment areas. Branch locations are given the most weight when determining performance conclusions; however, consideration was also given to the bank's network of ATMs, ITMs, and LPOs, as well as its online and mobile services. At the institution level, conclusions were primarily driven by performance in Missouri, Kansas City, and St. Louis, which balance out to reasonably accessible.

| <b>Rated Area</b> | <b>Accessibility of Delivery Systems</b> |
|-------------------|--|
| Missouri          | Accessible                               |
| Kansas City       | Reasonably Accessible                    |
| St. Louis         | Unreasonably Inaccessible to Portions    |
| Oklahoma          | Reasonably Accessible                    |
| Colorado          | Readily Accessible                       |
| <b>OVERALL</b>    | <b>REASONABLY ACCESSIBLE</b>             |

### **Changes in Branch Locations**

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.

| <b>Rated Area</b> | <b>Changes in Branch Locations</b>      |
|-------------------|---|
| Missouri          | Generally Not Adversely Affected        |
| Kansas City       | Generally Not Adversely Affected        |
| St. Louis         | Not Adversely Affected                  |
| Oklahoma          | Not Adversely Affected                  |
| Colorado          | Improved Accessibility                  |
| <b>OVERALL</b>    | <b>GENERALLY NOT ADVERSELY AFFECTED</b> |

When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. While these factors were considered, more weight was given to the changes in branch locations that were executed by The Central Trust Bank outside of the merger.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly to LMI geographies or individuals. The bank's branch locations are generally open between 8 a.m. to 5 p.m., with many locations operating extended hours and drive-through access with extended banking hours. Some of the bank's locations also offer Saturday hours from 9 a.m. to noon or Saturday drive-through hours. While the bank's hours vary between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas.

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| Rated Area     | Reasonableness of Business Hours and Services   |
|----------------|---|
| Missouri       | Do Not Vary in a Way That Inconveniences        |
| Kansas City    | Do Not Vary in a Way That Inconveniences        |
| St. Louis      | Do Not Vary in a Way That Inconveniences        |
| Oklahoma       | Do Not Vary in a Way That Inconveniences        |
| Colorado       | Do Not Vary in a Way That Inconveniences        |
| <b>OVERALL</b> | <b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b> |

### Community Development Services

Overall, the bank provides a relatively high level of community development services throughout its assessment areas, as displayed in the following table.

| Rated Area     | Community Development Services |
|----------------|--------------------------------|
| Missouri       | Relatively High                |
| Kansas City    | Adequate                       |
| St. Louis      | Relatively High                |
| Oklahoma       | Adequate                       |
| Colorado       | Limited                        |
| <b>OVERALL</b> | <b>RELATIVELY HIGH</b>         |

During the review period, 229 bank employees provided 13,122 hours of community development service activities to 143 organizations. Despite challenges posed by the pandemic, bank employees lent their expertise in various capacities, such as board member, financial service provider, and financial literacy instructor, to local community service and economic development organizations. The bank was also able to continue delivering its financial literacy and coaching services through its proprietary ProsperU program by offering virtual options.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Consumer Affairs examination included a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. Based on findings from that concurrent examination, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

## MISSOURI

**CRA RATING FOR MISSOURI:****The Lending Test is rated:****The Investment Test is rated:****The Service Test is rated:****Satisfactory****High Satisfactory****High Satisfactory****High Satisfactory**

Major factors supporting the institution's Missouri rating include the following.

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment areas.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment areas.
- The bank is a leader in making community development loans throughout the Missouri assessment areas.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes a significant level of qualified community development investments and grants.
- Delivery systems are accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals
- The bank provides a relatively high level of community development services.

**SCOPE OF EXAMINATION**

Scoping considerations applicable to the review of Missouri assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. In four of the five assessment areas, small business lending received the greatest weight in the analysis, followed by HMDA lending, then small farm lending. In one assessment area, Jefferson City, small business and HMDA lending received equal weighting, followed by small farm lending.

The bank operates five assessment areas throughout Missouri, located in three MSAs and two noncontiguous nonMSA portions of the state. Two of the bank's Missouri assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Jefferson City assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Missouri, three community contact interviews were leveraged. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI**

The Central Trust Bank operates 77 offices (50.0 percent of total branches) throughout the five CRA assessment areas in the state of Missouri. The following table gives additional detail regarding the bank's operations within Missouri.

| Assessment Area | Offices   |               | Deposits<br>As of June 30, 2021 |               | Review Procedures     |
|-----------------|-----------|---------------|---------------------------------|---------------|-----------------------|
|                 | #         | %             | \$                              | %             |                       |
| Jefferson City  | 16        | 20.8%         | 3,049,070                       | 32.1%         | Full Scope            |
| Springfield     | 21        | 27.3%         | 1,573,455                       | 16.6%         | Full Scope            |
| Mid-Missouri    | 20        | 26.0%         | 2,138,947                       | 22.6%         | Limited Scope         |
| Columbia        | 15        | 19.5%         | 2,251,623                       | 23.7%         | Limited Scope         |
| Branson         | 5         | 6.5%          | 471,246                         | 5.0%          | Limited Scope         |
| <b>TOTAL</b>    | <b>77</b> | <b>100.0%</b> | <b>9,484,341</b>                | <b>100.0%</b> | <b>2 – Full Scope</b> |

As shown above, the bank's deposits in Missouri total \$9.5 billion, which represents 62.0 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates two LPO locations, 61 stand-alone ATMs, and three stand-alone ITMs. The bank's operations in the state are heavily concentrated in Jefferson City, which carried the greatest weight toward determining statewide ratings.

Through the merger with its affiliates, The Central Trust Bank added 65 branches and three assessment areas in Missouri. Prior to the merger, the bank's affiliates opened one branch, closed three branches, and relocated one branch across the five assessment areas, resulting in a net reduction of two branches. There was no other branch activity completed by the bank.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

### LENDING TEST

The bank's Lending Test performance in Missouri is rated High Satisfactory. The test considers the following criteria.

#### Lending Activity

| Full-Scope Review Areas | Lending Activity |
|-------------------------|------------------|
| Jefferson City          | Excellent        |
| Springfield             | Excellent        |
| <b>OVERALL</b>          | <b>EXCELLENT</b> |

| Limited-Scope Review Areas | Lending Activity |
|----------------------------|------------------|
| Mid-Missouri               | Consistent       |
| Columbia                   | Consistent       |
| Branson                    | Consistent       |

The bank's overall level of lending reflects excellent responsiveness to the credit needs of the Missouri assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

#### Borrower and Geographic Distribution

As displayed in the following tables, the bank's performance by borrower's income and revenue profile is good in Missouri.

| Full-Scope Review Areas | Loan Distribution by Borrower's Profile |
|-------------------------|---|
| Jefferson City          | Good                                    |
| Springfield             | Good                                    |
| <b>OVERALL</b>          | <b>GOOD</b>                             |

| Limited-Scope Review Areas | Loan Distribution by Borrower's Profile |
|----------------------------|---|
| Mid-Missouri               | Consistent                              |
| Columbia                   | Consistent                              |
| Branson                    | Below                                   |

Likewise, the bank's geographic distribution of loans in Missouri reflects good penetration.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|-------------------------|----------------------------------|
| Jefferson City          | Good                             |
| Springfield             | Excellent                        |
| <b>OVERALL</b>          | <b>GOOD</b>                      |

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| Limited-Scope Review Areas | Geographic Distribution of Loans |
|----------------------------|----------------------------------|
| Mid-Missouri               | Consistent                       |
| Columbia                   | Consistent                       |
| Branson                    | Exceeds                          |

### **Community Development Lending Activities**

Overall, the bank is a leader in making community development loans in its Missouri assessment areas, as displayed below.

| Full-Scope Review Areas | Community Development Lending Activities |
|-------------------------|--|
| Jefferson City          | Leader                                   |
| Springfield             | Relatively High                          |
| <b>OVERALL</b>          | <b>LEADER</b>                            |

| Limited-Scope Review Areas | Community Development Lending Activities |
|----------------------------|--|
| Mid-Missouri               | Below                                    |
| Columbia                   | Below                                    |
| Branson                    | Below                                    |

The bank's level of community development lending varied between the two full-scope assessment areas. As performance in Jefferson City received primary consideration towards overall statewide conclusions, the bank is considered a leader in community development lending overall. Though performance in the limited-scope review areas was below the statewide conclusion, activity levels in those assessment areas were relatively high or adequate. During the review period, the bank made 114 community development loans totaling \$106.3 million in the state of Missouri, 31 of which were PPP loans with a community development purpose.

### **Product Innovation**

The bank makes extensive use of flexible lending practices in serving the credit needs of the Missouri assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance Tests* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Missouri is described below:

- Through the SBA's PPP, the bank originated 12,418 PPP loans totaling \$682.3 million in its Missouri assessment areas and nearby geographies. According to metrics provided by the SBA, the bank ranked first in number of originations in Missouri<sup>1</sup> out of all lenders that participated in the program. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.

<sup>1</sup> Includes loans originated in the Missouri geographies pertaining to Kansas City and St. Louis.

- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those located in the bank's Missouri assessment areas.
- Through the Missouri Housing Development Commission Loan Program, which helps LMI families with closing costs and down payment assistance, the bank originated 90 loans totaling \$10.5 million in its Missouri assessment areas from 2019 through 2021.
- The bank provided 30 direct subsidies, totaling \$2.8 million, to LMI borrowers through the FHLB of Des Moines HomeStart Plus Program.
- The bank originated a significant volume of mortgage loans through the Fannie Mae HomeReady Loan Program and the Freddie Mac HomePossible Loan Program. Each program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans. From 2019 through 2021, the bank originated 154 HomeReady loans, totaling \$19.2 million, and two HomePossible loans, totaling \$319,130, in its Missouri assessment areas.
- From 2019 through 2021, the bank originated 87 loans, totaling \$25.4 million through the SBA-CDC/504 Loan Program and the SBA 7(a) Loan Program in its Missouri assessment areas. Through these programs, the bank offered small business loans that support small business operations and/or expansion.
- Through various programs, including the Farmer Mac Farm Credit System Loan Program and USDA FSA and RD Programs, the bank originated 60 farm loans, totaling \$20.9 million, in its Missouri assessment areas from 2019 through 2021. These loans are tailored to the needs of farmers and ranchers, including those who own small farms.
- The bank also originated a significant volume of mortgage loans through government loan programs in its Missouri assessment areas, including 330 FHA loans (\$49.2 million), 356 RD home loans (\$49.4 million), and 253 VA loans (\$61.6 million).

## INVESTMENT TEST

Overall, the bank's performance in Missouri is rated High Satisfactory under the Investment Test. The following tables display investment and grant activity performance in Missouri.

| Full-Scope Review Areas | Investment and Grant Activity |
|-------------------------|-------------------------------|
| Jefferson City          | Significant                   |
| Springfield             | Significant                   |
| <b>OVERALL</b>          | <b>SIGNIFICANT</b>            |



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| Limited-Scope Review Areas | Investment and Grant Activity |
|----------------------------|-------------------------------|
| Mid-Missouri               | Consistent                    |
| Columbia                   | Consistent                    |
| Branson                    | Below                         |

As shown in the table below, the bank's total investment and grant activity included \$21.2 million in qualified investments and grants and \$1.1 million in donations. These activities consisted primarily of investments in MBS supporting affordable housing throughout the Missouri assessment areas, as well as municipal bonds supporting community service in LMI areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

| Missouri Assessment Area | Investments           | Donations/Grants     |
|--------------------------|-----------------------|----------------------|
| Jefferson City           | \$3.6 million         | \$387,086            |
| Springfield              | \$4.9 million         | \$442,526            |
| Mid-Missouri             | \$6.4 million         | \$187,850            |
| Columbia                 | \$4.3 million         | \$41,350             |
| Branson                  | \$2.1 million         | \$38,025             |
| <b>TOTAL</b>             | <b>\$21.2 million</b> | <b>\$1.1 million</b> |

## SERVICE TEST

The bank's performance in Missouri is rated High Satisfactory under the Service Test. This test considers the following criteria:

### Accessibility of Delivery Systems

As displayed in the following tables, the bank's service delivery systems are accessible to geographies and individuals of different income levels in Missouri.

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|-------------------------|-----------------------------------|
| Jefferson City          | Accessible                        |
| Springfield             | Readily Accessible                |
| <b>OVERALL</b>          | <b>ACCESSIBLE</b>                 |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|----------------------------|-----------------------------------|
| Mid-Missouri               | Exceeds                           |
| Columbia                   | Consistent                        |
| Branson                    | Exceeds                           |

### Changes in Branch Locations

Through the merger with its affiliates, The Central Trust Bank added branches in all five of the assessment areas. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. While these factors

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were considered, more weight was given to the changes in branch locations that were executed by The Central Trust Bank outside of the merger. Moreover, while the Jefferson City assessment area generally carried the greatest weight toward determining statewide ratings, aside from the merger, there was no other branching activity in Jefferson City by the bank or its affiliates; therefore, for this component the Springfield assessment area was weighted more heavily toward determining the overall conclusion. Given these considerations, the bank's record of opening and closing branches in the Missouri assessment areas has generally not adversely affected access to its service delivery systems.

| Full-Scope Review Areas | Changes in Branch Locations             |
|-------------------------|---|
| Jefferson City          | Not Adversely Affected                  |
| Springfield             | Generally Not Adversely Affected        |
| <b>OVERALL</b>          | <b>GENERALLY NOT ADVERSELY AFFECTED</b> |

| Limited-Scope Review Areas | Changes in Branch Locations |
|----------------------------|-----------------------------|
| Mid-Missouri               | Consistent                  |
| Columbia                   | Exceeds                     |
| Branson                    | Exceeds                     |

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs**

Business hours and banking services do not vary in a way that inconveniences certain portions of the Missouri assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services   |
|-------------------------|---|
| Jefferson City          | Do not vary in a way that inconveniences        |
| Springfield             | Do not vary in a way that inconveniences        |
| <b>OVERALL</b>          | <b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b> |

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|----------------------------|---|
| Mid-Missouri               | Below   |
| Columbia                   | Consistent                                    |
| Branson                    | Below   |

### **Community Development Services**

The bank provides a relatively high level of community development services in the Missouri assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Missouri assessment areas.

| Full-Scope Review Areas | Community Development Services |
|-------------------------|--------------------------------|
| Jefferson City          | Relatively High                |
| Springfield             | Relatively High                |
| <b>OVERALL</b>          | <b>RELATIVELY HIGH</b>         |

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| Limited-Scope Review Areas | Community Development Services |
|----------------------------|--------------------------------|
| Mid-Missouri               | Consistent                     |
| Columbia                   | Below                          |
| Branson                    | Below                          |

During the review period, 106 bank employees provided 7,331 hours of community development service activities to 81 organizations throughout the Missouri assessment areas and nearby geographies. Despite challenges posed by the pandemic, bank employees lent their expertise in various capacities, such as board member, financial service provider, and financial literacy instructor, to local community service and economic development organizations. The bank was also able to continue delivering its financial literacy and coaching services through its proprietary ProsperU program by offering virtual options. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

## JEFFERSON CITY, MISSOURI METROPOLITAN STATISTICAL AREA

*(Full-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JEFFERSON CITY ASSESSMENT AREA

#### **Bank Structure**

Through the merger with its affiliate banks, The Central Trust Bank added four branches located in middle- and upper-income census tracts. The bank operates 16 of its offices in the Jefferson City assessment area, representing 10.4 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Number of Delivery Systems by Census Tract Classification |            |                 |               |              |
|---|------------|-----------------|---------------|--------------|
|   | Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| Offices   | 3          | 0               | 7             | 6            |

In addition to branches, the bank operates one LPO, 19 standalone ATMs, and one standalone ITM in the assessment area. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

#### **General Demographics**

The assessment area comprises the entirety of the Jefferson City, Missouri MSA, which includes Cole, Callaway, Moniteau, and Osage Counties. The assessment area's population is shown in the following table.

| County                                  | Population     |
|---|----------------|
| Cole County, Missouri                   | 76,533         |
| Callaway County, Missouri               | 44,566         |
| Moniteau County, Missouri               | 15,801         |
| Osage County, Missouri                  | 13,758         |
| <b>TOTAL ASSESSMENT AREA POPULATION</b> | <b>150,658</b> |

The majority of the assessment area population of 150,658 is concentrated in Cole County (50.8%) where the state capital, Jefferson City, is located. As a capital city, Jefferson City's economy is largely based on the government; however, it also hosts manufacturing facilities, universities, and a state prison. The remaining counties are more rural in nature with Moniteau County being the most remote. Along with the population figures shown in the preceding table, the assessment area has 6,301 businesses, 5,616 of which are small businesses (89.1 percent).

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There is a moderate level of competition in this assessment area where 20 FDIC-insured depository institutions operate 62 offices. The Central Trust Bank dominates the assessment area with a deposit market share of 52.4 percent, while the institution that ranks second possesses only 9.4 percent. The bank is also the leading HMDA and CRA lender in the assessment area, further illustrating the bank's significant role in meeting the community's credit needs.

As a result of the factors described, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. Specifically, community contacts noted the need for home purchase loans, home improvement loans, and down payment assistance programs, as well as small dollar small business loans that apply nontraditional methods for determining creditworthiness. The contacts also stated that there are ample opportunities for financial institution involvement in community development efforts, though they would like to see an increase in the number of local community development financial institutions.

### **Income and Wealth Demographics**

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area in 2020.

| <b>Assessment Area Demographics by Geography Income Level</b> |             |                  |                |               |                 |               |
|---|-------------|------------------|----------------|---------------|-----------------|---------------|
| <b>Dataset</b>  | <b>Low-</b> | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>Unknown-</b> | <b>TOTAL</b>  |
| Census  | 1           | 3                | 22             | 5             | 0               | <b>31</b>     |
| Tracts  | 3.2%        | 9.7%             | 71.0%          | 16.1%         | 0.0%            | <b>100%</b>   |
| Family  | 461         | 3,255            | 25,546         | 7,833         | 0               | <b>37,095</b> |
| Population  | 1.2%        | 8.8%             | 68.9%          | 21.1%         | 0.0%            | <b>100%</b>   |

As shown in the preceding table, the majority of census tracts in the assessment area are middle-income (71.0 percent) while only 12.9 percent are LMI. Comparatively, 68.9 percent of the total families in the assessment area live in middle-income areas while 10.0 percent live in LMI census tracts. The LMI areas are primarily concentrated in Jefferson City in Cole County, while the remaining moderate-income census tract is in a rural portion of Callaway County. Community contacts noted that individuals in these areas find homeownership challenging to obtain due to low and aging affordable housing inventories. The contacts also identified challenges individuals face in starting new small businesses due to a lack of small dollar small business loan products and low credit scores.

According to 2015 ACS data, the median family income for the assessment area was \$62,506. In comparison, the median family income for the state of Missouri was below the assessment area at \$60,809. The following table displays the distribution of assessment area families by income level compared to all Missouri families.

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| Family Population by Income Level |         |           |         |         |                  |
|-----------------------------------|---------|-----------|---------|---------|------------------|
| Dataset                           | Low-    | Moderate- | Middle- | Upper-  | TOTAL            |
| Jefferson City                    | 6,788   | 6,469     | 9,357   | 14,481  | <b>37,095</b>    |
|                                   | 18.3%   | 17.4%     | 25.2%   | 39.0%   | <b>100%</b>      |
| Missouri                          | 327,271 | 274,380   | 319,267 | 609,088 | <b>1,530,006</b> |
|                                   | 21.4%   | 17.9%     | 20.9%   | 39.8%   | <b>100%</b>      |

As shown in the previous tables, 10.0 percent of families live in LMI census tracts, though 35.7 percent of families in the assessment area are LMI. This LMI family percentage is less than the 39.3 percent of LMI families in the state of Missouri. In addition, the percentage of families living below the poverty level in the assessment area (8.9 percent), is less than that of the state of Missouri (11.1 percent). This data conveys that the assessment area is more affluent than the state of Missouri. A review of county-level data shows consistent comparative affluence. Nevertheless, community contacts highlight that there are pockets of poverty throughout the assessment area.

### Housing Demographics

The following table displays key housing demographics for the assessment area and state of Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

| Housing Demographics |                      |                     |                             |  |
|----------------------|----------------------|---------------------|-----------------------------|--|
| Dataset              | Median Housing Value | Affordability Ratio | Median Gross Rent (Monthly) | Housing Cost Burden (Renters   Owners) |
| Jefferson City       | \$138,419            | 37.0%               | \$608                       | 32.0%   14.0%                          |
| Missouri             | \$138,400            | 34.8%               | \$746                       | 40.6%   18.0%                          |

Based on the affordability ratio and housing cost burden figures, housing is more affordable in the assessment area despite similar median housing values to the state. Though differences exist between counties, their comparative affordability to Missouri are consistently higher. The assessment area benefits from having a higher median family income, combined with a significantly lower median gross rent than the state of Missouri. Community contacts, however, noted that LMI residents struggle to obtain affordable housing. Jefferson City in particular has several LMI census tracts where affordable housing shortages have resulted in an overcrowding of housing units. In the rural areas, including Moniteau and Callaway Counties, housing is more affordable, but there is a need for home repairs. Overall, many LMI residents struggle to find loan products that meet their needs.

### Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 5,616, or 89.1 percent, of businesses in the assessment area have revenues under \$1 million. County business patterns indicate that there are 74,589 paid employees in the assessment area. According to community contacts, healthcare and

higher education are major employers in Cole County where the state capital serves as a regional economic engine. In Moniteau, Callaway, and Osage Counties, agricultural and manufacturing employers have a dominant presence. By percentage of employees, the largest job category in the assessment area is by far the government at 31.2 percent. The next largest job categories are retail trade (11.4 percent), manufacturing (9.4 percent), and healthcare and social assistance (8.1 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

| <b>Unemployment Data</b> |                            |                            |                            |
|--------------------------|----------------------------|----------------------------|----------------------------|
| <b>Dataset</b>           | <b>2019 Annual Average</b> | <b>2020 Annual Average</b> | <b>2021 Annual Average</b> |
| Jefferson City           | 2.7%                       | 4.3%                       | 3.2%                       |
| Missouri                 | 3.3%                       | 6.1%                       | 4.4%                       |

As shown in the preceding table, unemployment levels in the assessment area remained lower than the state of Missouri during the review period. Though differences exist between counties, their levels were consistently below that of Missouri. In 2020, unemployment levels significantly increased in line with the national unemployment trend resulting from the impact of the pandemic. The largest increase was in Cole County, where small businesses concentrated in that county were forced to lay off employees or close. As shown in the table, unemployment levels in 2021 declined, trending down toward their pre-pandemic levels.

### **Community Contact Information**

For this assessment area, three community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. Two interviews were with individuals specializing in affordable housing, while the third was with an individual specializing in economic development.

Contacts identified the need for affordable housing in all four counties of the assessment area with some noteworthy differences. In the more urban areas, namely Cole County, contacts highlighted the need for more affordable housing stock. While this has been a need in the county in the past, it has become more pronounced given the recent housing supply shortage, increased cost of materials and home maintenance, and rising home prices. Jefferson City in particular has several LMI census tracts where affordable housing shortages have resulted an overcrowding of housing units as multiple families consolidate into a single unit. In the rural areas, including Moniteau and Callaway Counties, housing is more affordable, but there is a need for home repairs, which are challenging for homeowners to fund due to the high costs of materials, maintenance, and labor. Homeowners also struggle to find loan products that meet their needs.

To assist LMI borrowers in obtaining needed housing, contacts suggested banks provide closing cost assistance, small dollar and low interest loans to respond to their unique needs, and alternative means to determining credit worthiness.

Regarding economic development, contacts noted a rise in new start-up businesses since the pandemic. However, start-up and existing businesses are challenged with finding affordable capital and access to credit. The contact shared that some business owners have poor credit histories. Others were not eligible for federal funding like the PPP loans and SBA's Economic Injury Disaster Loans due to credit score thresholds. Contacts also shared that most of these businesses seek small dollar loans, between \$10,000 to \$20,000 to start or scale their business, which are not always available or affordable.

Similar to the suggestions regarding affordable housing, contacts suggested banks offer small dollar business loans to small business owners and use alternative methods for determining creditworthiness.



**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JEFFERSON CITY ASSESSMENT AREA****LENDING TEST**

Lending levels reflect excellent responsiveness to the credit needs of the Jefferson City assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Additionally, the bank is a leader in making community development loans in this assessment area.

**Lending Activity**

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

| <b>Summary of Lending Activity<br/>January 1, 2019 through December 31, 2020</b> |              |               |                  |               |
|--|--------------|---------------|------------------|---------------|
| <b>Loan Type</b>   | <b>#</b>     | <b>%</b>      | <b>\$ (000s)</b> | <b>%</b>      |
| Home Improvement   | 42           | 0.6%          | 2,532            | 0.3%          |
| Home Purchase  | 1,427        | 20.3%         | 237,401          | 26.2%         |
| Multifamily Housing  | 19           | 0.3%          | 9,465            | 1.0%          |
| Refinancing  | 1,756        | 25.0%         | 318,062          | 35.1%         |
| Other  | 40           | 0.6%          | 4,374            | 0.5%          |
| <b>TOTAL HMDA</b>  | <b>3,284</b> | <b>46.8%</b>  | <b>571,834</b>   | <b>63.2%</b>  |
| <b>Small Business</b>  | <b>3,309</b> | <b>47.2%</b>  | <b>301,835</b>   | <b>33.4%</b>  |
| <b>Small Farm</b>  | <b>423</b>   | <b>6.0%</b>   | <b>31,229</b>    | <b>3.5%</b>   |
| <b>TOTAL LOANS</b>   | <b>7,016</b> | <b>100.0%</b> | <b>904,898</b>   | <b>100.0%</b> |

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 24.3 percent by number and 14.1 percent by dollar were made in the Jefferson City assessment area in 2019 and 16.4 percent by number and 14.5 percent by dollar in 2020. These percentages are closely aligned with the percentage of total bank deposits held in the assessment area (19.9 percent by dollar) and higher than the percentage of total bank branches located in the Jefferson City assessment area (10.4 percent). Additionally, the bank's lending levels were compared to those of the other lenders in the assessment area. In 2019 and 2020 years, the bank ranked first in number of originations by wide margins across all HMDA and CRA products, demonstrating the key role the bank plays in meeting the area's credit needs. Finally, the bank's concentration on HMDA and small business lending helps meet the greatest credit needs identified by community contacts.

**Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the Jefferson City assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining

overall conclusions, HMDA and small business loans are given more weight than small farm loans.  
*HMDA Lending*

In both 2019 and 2020, the bank's HMDA lending reflects good penetration among individuals of different income levels, particularly LMI individuals.

In 2019, the percentage of loans to low-income borrowers (10.4 percent) was slightly below the percentage of aggregate HMDA loans (12.0 percent) and the percentage of families in the assessment area that are low income (18.3 percent), reflecting adequate performance. The distribution of loans to moderate-income borrowers (19.9 percent) was above the aggregate (17.4 percent) and in line with the demographic (20.1 percent) figures, which is considered excellent. Therefore, overall distribution in 2019 is considered good.

In 2020, the percentage of loans to low-income borrowers (6.7 percent) was equal to the percentage of aggregate HMDA loans (6.7 percent) and under the percentage of families in the assessment area that are low income (18.3 percent), reflecting good performance. The distribution of loans to moderate-income borrowers (19.0 percent) was above both the aggregate (18.7 percent) and the demographic (17.4 percent) figures, which is considered excellent. Therefore, overall distribution in 2020 is considered good.

#### *Small Business Lending*

In both years, the bank's small business lending reflects a good distribution to businesses of different sizes. In 2019, the bank made 70.0 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance exceeded that of peer institutions in the assessment area at 50.1 percent but was significantly below the demographic estimate of assessment area businesses with this revenue profile at 89.1 percent, reflecting good performance.

In 2020, the bank made 40.4 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is slightly under the aggregate at 42.3 percent and significantly under the demographic at 89.1 percent. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. The analysis revealed that 83.4 percent of total PPP loans had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, as community contacts specializing in economic development noted the need for small dollar, small business loans. Therefore, overall distribution of loans to businesses of different revenue sizes is good.

*Small Farm Lending*

Small farm lending to farms of different sizes in the assessment area is excellent in both years. In 2019, the bank originated 90.2 percent of its small farm loans to farms with annual revenues of \$1 million or less, which is significantly higher than the aggregate lending level of 76.4 percent and near the demographic figure of 98.8 percent. Likewise, the bank's level of lending to farms with this revenue profile in 2020 (80.4 percent) also exceeded aggregate lending performance (72.9 percent) and approached the demographic figure (98.7 percent). Therefore, overall distribution remains excellent in 2020.

**Geographic Distribution of Loans**

Overall, the geographic distribution of loans in the assessment area is good based on all three products reviewed, with HMDA and small business lending receiving primary consideration and small farm lending weighted least heavily.

*HMDA Lending*

The geographic distribution of HMDA loans during the review period is considered good overall. In 2019, the bank's percent of HMDA loans originated in low-income census tracts (1.1 percent) was above the 0.6 percent originated by peer institutions in the assessment area and the percentage of owner-occupied housing units that are in low-income census tracts (0.4 percent), reflecting excellent performance. The bank's distribution of HMDA loans in moderate-income census tracts (4.8 percent) is slightly below the aggregate (6.2 percent) and the demographic (6.9 percent), which is considered adequate. Therefore, combined distribution in LMI census tracts in 2019 is good.

In 2020, the volume of HMDA lending and the distribution of loans in low-income census tracts declined, placing the bank's distribution (0.3 percent) more in line with the aggregate (0.5 percent) and the demographic (0.4 percent), reflecting good performance. The bank originated 4.2 percent of its HMDA loans in moderate-income census tracts, which is slightly below the 5.2 percent aggregate performance and the 6.9 percent demographic figure. When considering home purchase loans exclusively (a significant credit need), data shows bank distribution (6.0 percent) is fractions of a percent from the aggregate (6.2 percent) and near the demographic (6.9 percent). Therefore, distribution in moderate-income census tracts is good, resulting in overall good distribution in LMI census tracts in 2020

### *Small Business Lending*

The distribution of small business loans by geography income level is good overall. In 2019 and 2020, the bank's level of small business lending in low-income census tracts (6.3 percent in both years) was similar to aggregate lending levels (6.2 percent in 2019 and 6.6 percent in 2020). The bank was below the demographic figure in both years (8.1 percent in 2019 and 8.3 percent in 2020), though the margin was small. Therefore, in both years, the bank's performance in low-income census tracts is good.

Bank performance in moderate-income census tracts was consistent in 2019 and 2020, with the bank outperforming both the aggregate and demographic each year. Bank distribution in 2019 and 2020 (15.0 percent and 12.9 percent, respectively) was above the aggregate (12.0 percent and 12.2 percent, respectively) and the demographic (13.2 percent and 12.8 percent, respectively), therefore, distribution in moderate-income census tracts is excellent both years. The bank's overall distribution in the combined LMI areas outperforms the aggregate and is slightly below the demographic and is, therefore, considered good.

### *Small Farm Lending*

Based on the low number of farms in low-income census tracts, opportunities for small farm lending in low-income census tracts are de minimis in this assessment area; therefore, the bank's performance was based entirely on small farm lending in moderate-income census tracts.

In 2019, the bank's percentage of small farm loans in moderate-income census tracts (3.3 percent) was lower than both the aggregate percentage (10.0 percent) and demographic percentage (12.8 percent) and is considered poor. Similarly, in 2020, the bank's small farm loan distribution in moderate-income census tracts (4.3 percent) remained under the aggregate (8.9 percent) and the demographic (13.5 percent), reflecting poor performance. When evaluating both years of data, overall geographic distribution of small farm loans is poor.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure, and no conspicuous lending gaps in LMI areas were noted.

### **Community Development Lending Activities**

The Central Trust Bank is a leader in making community development loans in the Jefferson City assessment area. During the review period, the bank originated or renewed 34 community development loans totaling \$35.5 million, including 11 PPP loans with a community development purpose totaling \$4.4 million. This amount is above the performance of peer banks operating in the assessment area and is also an increase in number and amount since the bank's previous CRA examination, when the bank was also considered a leader. Noteworthy loans are discussed following the table below.

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| Community Development Lending |                    |              |                    |              |                               |               |                      |              |           |               |
|-------------------------------|--------------------|--------------|--------------------|--------------|-------------------------------|---------------|----------------------|--------------|-----------|---------------|
|                               | Affordable Housing |              | Community Services |              | Revitalization/ Stabilization |               | Economic Development |              | TOTAL     |               |
|                               | #                  | \$ (000s)    | #                  | \$ (000s)    | #                             | \$ (000s)     | #                    | \$ (000s)    | #         | \$ (000s)     |
| Community Development Loans   | 11                 | 6,237        | 7                  | 1,504        | 5                             | 23,400        | 0                    | 0            | 23        | 31,141        |
| PPP Loans                     | 2                  | 50           | 6                  | 591          | 1                             | 1,188         | 2                    | 2,563        | 11        | 4,393         |
| <b>TOTAL</b>                  | <b>13</b>          | <b>6,288</b> | <b>13</b>          | <b>2,095</b> | <b>6</b>                      | <b>24,588</b> | <b>2</b>             | <b>2,563</b> | <b>34</b> | <b>35,534</b> |

- Two originations totaling \$11.5 million for the purchase and renovation of office buildings to be leased out for commercial space in LMI census tracts, which are also designated as empowerment zones.
- Five revolving lines of credit totaling \$9.2 million to two healthcare facilities located in moderate-income census tracts to be used for working capital and renovations.
- Thirteen loan originations or extensions totaling \$6.3 million to build or improve affordable housing for LMI residents, including a 29-unit apartment building located in the low-income census tract.
- Eleven PPP loans totaling \$4.4 million qualified as community development, which helped sustain businesses and nonprofits during the pandemic and are considered particularly responsive to assessment area credit needs.

## INVESTMENT TEST

The Central Trust Bank makes a significant level of qualified community development investments and grants in the Jefferson City assessment area. During the review period, the bank had 17 investments and 72 donations totaling \$4.0 million in the Jefferson City assessment area. Of that total, \$3.5 million were current-period investments, \$155,100 were prior-period investments still outstanding, and \$387,086 were in donations to various community development organizations. Overall investments and donations were slightly higher than performance at the bank's previous examination.

| Community Development Investments |                    |              |                    |                |                               |           |                      |                |           |                |
|-----------------------------------|--------------------|--------------|--------------------|----------------|-------------------------------|-----------|----------------------|----------------|-----------|----------------|
|                                   | Affordable Housing |              | Community Services |                | Revitalization/ Stabilization |           | Economic Development |                | TOTAL     |                |
|                                   | #                  | \$ (000s)    | #                  | \$ (000s)      | #                             | \$ (000s) | #                    | \$ (000s)      | #         | \$ (000s)      |
| Investments                       | 5                  | \$553        | 10                 | \$1,495        |                               |           | 2                    | \$1,600        | 17        | \$3,648        |
| Donations                         | 9                  | \$66         | 62                 | \$319          | -                             | -         | 1                    | \$3            | 72        | \$387          |
| <b>TOTAL</b>                      | <b>14</b>          | <b>\$619</b> | <b>72</b>          | <b>\$1,804</b> | <b>-</b>                      | <b>-</b>  | <b>3</b>             | <b>\$1,603</b> | <b>89</b> | <b>\$4,035</b> |

Investments and donations deemed most responsive in the Jefferson City assessment area include:

- Ten municipal bonds, totaling \$1.5 million, that fund school districts where the majority of the students are LMI.
- Two investments, totaling \$1.6 million, into SBA loan funds that support small businesses in the area and promote economic development.
- Ten donations, totaling \$136,761, to a community service organization that provides the majority of its services to LMI children and families.

## SERVICE TEST

Service delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Jefferson City assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides a relatively high level of community development services in the Jefferson City assessment area.

### Accessibility of Delivery Systems

The bank operates 16 branches in the Jefferson City assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

| Branch Distribution by Geography Income Level |                        |           |            |            |           |                          |
|---|------------------------|-----------|------------|------------|-----------|--------------------------|
| Dataset                                       | Geography Income Level |           |            |            |           | TOTAL                    |
|   | Low-                   | Moderate- | Middle-    | Upper-     | Unknown-  |                          |
| Branches                                      | 3<br>18.8%             | 0<br>0.0% | 7<br>43.8% | 6<br>37.5% | 0<br>0.0% | <b>16</b><br><b>100%</b> |
| Census Tracts                                 | 3.2%                   | 9.7%      | 71.0%      | 16.1%      | 0.0%      | <b>100%</b>              |
| Household Population                          | 2.2%                   | 10.0%     | 67.1%      | 20.7%      | 0.0%      | <b>100%</b>              |

As shown in the previous table, the bank operates three branches (18.8 percent) in the low-income geography, which is well above demographic data used for comparison. While the bank does not have any branches located in moderate-income geographies, several branches are located on or very near a moderate-income census tract border. Overall, the bank's service delivery systems are accessible to geographies and individuals of different income levels.

### Changes in Branch Locations

At the start of the review period, the bank operated 12 branches in this assessment area. As a result of the merger with its affiliate banks, the bank added one branch in a middle-income census tract

and three branches in an upper-income census tract. No new branches were opened, and no branches were closed during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches. As such, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the Jefferson City assessment area. Branches are typically open from 8:30 a.m. to 4:30 p.m. Monday through Friday or similar, and 13 branches, including one branch in an LMI census tract, have open lobby hours on Saturday mornings. Ten branches have drive-up access, including one branch in an LMI area; seven branches have ITM access with extended hours Monday through Saturday, including one branch in an LMI area; and 7 branches have loan officers on site, including two branches in LMI areas. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provided a relatively high level of community development services in the assessment area during the review period. In total, 21 employees provided 3,320 hours of community development services to 20 different organizations benefitting the assessment area. Despite challenges posed by the pandemic, bank employees provided services to organizations promoting affordable housing, community services for LMI families and children, and economic development. Impactful services are described below:

- Fifteen employees offered 2,049 hours of service as board members of 12 community service, affordable housing, and economic development organizations in the assessment area.
- Five employees provided 662 hours of technical expertise to various affordable housing and community service organizations, serving in a human resource capacity (105 hours) or as treasurer (557 hours).

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## SPRINGFIELD, MISSOURI METROPOLITAN STATISTICAL AREA

*(Full-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD ASSESSMENT AREA

#### **Bank Structure**

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates 21 of its offices in the Springfield assessment area, representing 13.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Number of Delivery Systems by Census Tract Classification |            |                 |               |              |
|---|------------|-----------------|---------------|--------------|
|   | Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| Offices   | 0          | 7               | 11            | 3            |

In addition to branches, the bank operates 15 standalone ATMs. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to the entire assessment area.

#### **General Demographics**

The assessment area includes the Springfield, Missouri MSA in its entirety, which includes Christian, Dallas, Greene, Polk, and Webster Counties. The assessment area has a total population of 448,471, most of which is concentrated in Greene County (63.1 percent) where the city of Springfield is located. The city is the urban core of the assessment area and home to universities, including Missouri State University with a student population of over 23,000, and corporate headquarters for multiple national retailers. The second largest county, Christian County (18.0 percent), hosts a large suburban population, and the remaining counties are more rural in nature.

| County                                  | Population     |
|---|----------------|
| Greene County, Missouri                 | 283,206        |
| Christian County, Missouri              | 80,904         |
| Webster County, Missouri                | 36,690         |
| Polk County, Missouri                   | 31,107         |
| Dallas County, Missouri                 | 16,564         |
| <b>TOTAL ASSESSMENT AREA POPULATION</b> | <b>448,471</b> |

The Springfield assessment area has a highly competitive banking market to the point where community contacts suggest the market may be over-saturated. There are 32 FDIC-insured depository institutions operating 185 offices in the assessment area. The Central Trust Bank holds 10.8 percent of the deposit market share, ranking third behind two institutions that hold 13.5 percent



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and 11.0 percent. Though third in deposit market share, compared to other HMDA and CRA data reporters, the bank is ranked first in CRA lending, with significantly higher lending levels than the second-ranked institution, and sixth in HMDA lending.

Along with the population figures shown in the preceding table, the assessment area has 19,641 businesses, 17,911 of which are small businesses (91.2 percent). Within the city of Springfield, there is a concentration of small businesses in the downtown area that include restaurants and boutiques. As a result, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. More specifically, community contacts noted particular needs for affordable owner-occupied housing, home improvement loans, and small dollar small business loans.

### **Income and Wealth Demographics**

The following table summarizes the assessment area's distribution of census tracts by income level and the family population within those tracts.

| <b>Assessment Area Demographics by Geography Income Level</b> |             |                  |                |               |                 |                |
|---|-------------|------------------|----------------|---------------|-----------------|----------------|
| <b>Dataset</b>  | <b>Low-</b> | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>Unknown-</b> | <b>TOTAL</b>   |
| Census Tracts   | 5           | 23               | 49             | 13            | 1               | <b>91</b>      |
|   | 5.5%        | 25.3%            | 53.8%          | 14.3%         | 1.1%            | <b>100%</b>    |
| Family Population   | 3,596       | 19,711           | 71,184         | 20,307        | 41              | <b>114,839</b> |
|   | 3.1%        | 17.2%            | 62.4%          | 17.4%         | 0.0%            | <b>100%</b>    |

As shown above, 30.8 percent of the census tracts in the assessment area are LMI geographies, but only 20.3 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of Springfield in Greene County. Further review of LMI tract information by county indicates all low-income tracts and 19 moderate-income tracts are located in Greene County; some of which include the student population of the nearby colleges. Furthermore, two moderate-income tracts are located in Dallas County, and the remaining two moderate-income tracts are located in Webster County.

According to 2015 ACS data, the median family income for the assessment area was \$54,507. At the same time, the median family income for the entire state of Missouri was \$60,809. The following table displays population percentages of assessment area families by income level compared to the state of Missouri.

| <b>Family Population by Income Level</b> |             |                  |                |               |                  |
|--|-------------|------------------|----------------|---------------|------------------|
| <b>Dataset</b>                           | <b>Low-</b> | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>TOTAL</b>     |
| Springfield                              | 23,291      | 21,519           | 24,283         | 45,746        | <b>114,839</b>   |
|  | 20.3%       | 18.7%            | 21.2%          | 39.8%         | <b>100%</b>      |
| Missouri                                 | 327,271     | 274,380          | 319,267        | 609,088       | <b>1,530,006</b> |
|  | 21.4%       | 17.9%            | 20.9%          | 39.8%         | <b>100%</b>      |

The table above reveals that 39.0 percent of the families in the assessment area are considered LMI, which is similar to the state of Missouri (39.3 percent). Furthermore, the percentage of families living below the poverty level in the assessment area (12.0 percent) is just above the percentage of Missouri families (11.1 percent). Some differences in income exist between counties; for example, the portion of LMI families in Christian County is 32.5 percent, while in Dallas County it is 52.7 percent. However, the consolidated LMI percentages indicate that the overall assessment area is similar in affluence to the state of Missouri.

### **Housing Demographics**

The following table displays key housing demographics for the assessment area and state of Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

| <b>Housing Demographics</b> |                             |                            |                                    |   |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|---|
| <b>Dataset</b>              | <b>Median Housing Value</b> | <b>Affordability Ratio</b> | <b>Median Gross Rent (Monthly)</b> | <b>Housing Cost Burden (Renters   Owners)</b> |
| Springfield                 | \$129,482                   | 33.3%                      | \$696                              | 43.0%   16.6%                                 |
| Missouri                    | \$138,400                   | 34.8%                      | \$746                              | 40.6%   18.0%                                 |

The data indicates that homeownership is similarly affordable in the assessment area compared to the state of Missouri. For homeowners, the housing cost burden (16.6 percent) is less than that of Missouri (18.0 percent), suggesting that homeownership is more affordable in the assessment area. In contrast, the housing cost burden for renters is higher in Springfield (43.0 percent) than the state (40.6 percent), signaling that renting is less affordable in the assessment area when considering household income. Community contacts explained that rental costs in comparison to area wages make it challenging for many households to transition to homeownership. According to 2015 ACS data, a higher percentage of low-income renters (78.4 percent) and moderate-income renters (37.5 percent) are paying greater than 30.0 percent of their income toward housing costs as compared to the state of Missouri (74.0 percent and 31.5 percent, respectively). Contacts also indicate that many homes in the city of Springfield are of older stock and are, therefore, more difficult for LMI individuals to acquire, considering the funds needed for down payment, updates, and renovation. To address housing needs in the area, contacts cite the need for more affordable housing so that LMI residents may transition from renting to owning.

### **Industry and Employment Demographics**

The assessment area maintains a large and diverse business community. County business patterns indicate there are 204,527 paid employees in the assessment area. By percentage of employees, the three largest job categories are healthcare and social assistance (18.0 percent), government (13.7 percent), and retail trade (12.4 percent). Though major employers, such as hospitals, the city of Springfield, and large national retailers, account for much of the area's employment, the small business sector is also strong with 17,911 (91.2 percent) of businesses reporting annual revenues

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of \$1 million or less. Community contacts describe the area as having a culture of entrepreneurship where resources for start-ups are readily available.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri.

| <b>Unemployment Data</b> |                            |                            |                            |
|--------------------------|----------------------------|----------------------------|----------------------------|
| <b>Dataset</b>           | <b>2019 Annual Average</b> | <b>2020 Annual Average</b> | <b>2021 Annual Average</b> |
| Springfield              | 2.9%                       | 5.2%                       | 3.4%                       |
| Missouri                 | 3.3%                       | 6.1%                       | 4.4%                       |

Overall unemployment levels in the assessment area remained lower than the state of Missouri during the review period. Dallas County was the only geography with unemployment rates that were consistently above the state of Missouri. This aligns with data showing that the majority of employers are located closer to the assessment area's urban core, presenting a transportation challenge for individuals in rural Dallas County.

As generally seen nationwide, unemployment levels significantly increased in 2020 resulting from the impact of the pandemic. The largest increase was in Greene County where there is a large concentration of small businesses that were forced to lay off employees or close. As shown in the table, unemployment levels in 2021 declined, trending downward toward their pre-pandemic levels.

### **Community Contact Information**

For this assessment area, two community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. One interview was with a representative from an economic development organization that promotes affordable housing and small business development. The other was with an individual representing an organization that advocates for businesses in the area. The contacts described the overall economy as growing in size and diversity, citing healthcare, education, government, and manufacturing as the major industries. Contacts suggested that the mix of industries provides insulation from recession and limits dependency on individual corporations for employment. Regarding banking, contacts affirmed that there is significant competition in the area, with one contact suggesting the area may be saturated. Nevertheless, there are ample opportunities for banks to invest in the community.

Regarding small businesses, contacts stated that many are concentrated in the city of Springfield, particularly downtown. One contact described Springfield as having a strong entrepreneur culture with many small business partnerships and resources available to interested entrepreneurs. During the pandemic, many of the small businesses were forced to close, namely restaurants and boutiques, but have since begun to reopen. Business has increased, though labor and supply shortages have limited the return to pre-pandemic levels. Credit needs for small businesses were identified as microloans and diverse credit offerings tailored to individual small businesses.

Affordable housing needs in the area were identified as down payment and closing cost assistance for home purchase and home improvement loans. One contact explained that insufficient collateral and challenges paying for closing costs have prevented LMI residents from obtaining much-needed loans. Springfield has an aging housing stock, especially in LMI census tracts in the city of Springfield, which require improvements to sustain. In addition to credit needs related to aging homes, more affordable housing options are needed in the area.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD ASSESSMENT AREA

### LENDING TEST

Lending levels reflect excellent responsiveness to the credit needs of the Springfield assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects excellent penetration throughout the assessment area. Additionally, the bank makes a relatively high level of community development loans in this assessment area.

### Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

| <b>Summary of Lending Activity</b>               |              |               |                  |               |
|--|--------------|---------------|------------------|---------------|
| <b>January 1, 2019 through December 31, 2020</b> |              |               |                  |               |
| <b>Loan Type</b>                                 | <b>#</b>     | <b>%</b>      | <b>\$ (000s)</b> | <b>%</b>      |
| Home Improvement                                 | 13           | 0.3%          | 1,147            | 0.2%          |
| Home Purchase                                    | 825          | 17.1%         | 155,536          | 25.4%         |
| Multifamily Housing                              | 23           | 0.5%          | 19,079           | 3.1%          |
| Refinancing                                      | 748          | 15.5%         | 145,694          | 23.8%         |
| Other  | 5            | 0.1%          | 616              | 0.1%          |
| <b>Total HMDA</b>                                | <b>1,614</b> | <b>33.5%</b>  | <b>322,072</b>   | <b>52.6%</b>  |
| <b>Small Business</b>                            | <b>2,754</b> | <b>57.1%</b>  | <b>254,555</b>   | <b>41.6%</b>  |
| <b>Small Farm</b>                                | <b>451</b>   | <b>9.4%</b>   | <b>35,373</b>    | <b>5.8%</b>   |
| <b>TOTAL LOANS</b>                               | <b>4,819</b> | <b>100.0%</b> | <b>612,000</b>   | <b>100.0%</b> |

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 16.3 percent by number and 12.9 percent by dollar were made in the Springfield assessment area in 2019 and 11.4 percent by number and 9.6 percent by dollar in 2020. These percentages are closely aligned with the percentage of total bank deposits held in the assessment area (10.3 percent by dollar) and the percentage of total bank branches located in the Springfield assessment area (13.6 percent). Additionally, the bank's lending levels were compared to those of the other lenders in the assessment area. Consistent with the bank's concentration of commercial lending in its loan portfolio, the bank ranked first in CRA lending by a wide margin in 2019 and 2020. Related, the bank ranked sixth and eleventh in HMDA lending out of over 300 reporters in 2019 and 2020, respectively. As community contacts noted that both loan types were a significant need in the area, this level of lending compared to peer performance is especially significant.

### **Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the Springfield assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining overall conclusions, small business loans are given the most weight, followed by HMDA loans. Small farm lending is given the least weight.

#### *HMDA Lending*

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. The percentage of loans to low-income borrowers in 2019 and 2020 (6.8 percent and 7.0 percent, respectively) is above the percentage of aggregate HMDA loans to low-income borrowers in the assessment area over the same period (6.2 percent and 6.1 percent, respectively). Bank performance was below the percentage of families in the assessment area that are low income (20.3 percent, both years); however, a large portion of these families (59.4 percent in both years) are below the assessment area's poverty level, presenting a significant barrier to homeownership. Given this context, distribution of lending to low-income borrowers is considered good in both years.

The bank's performance in lending to moderate-income borrowers in 2019 is excellent as the percentage of HMDA loans originated to moderate-income borrowers (19.8 percent) is higher than the aggregate HMDA lending levels (17.2 percent) and the percentage of moderate-income families in the assessment area (18.7 percent). In 2020, the bank's distribution of HMDA loans to moderate-income borrowers (15.7 percent) dropped below the aggregate level (16.5 percent) and the demographic (18.7 percent). This represents adequate performance in 2020, yielding overall good performance in lending to moderate-income borrowers across both years. Thus, overall distribution to LMI borrowers in 2019 and 2020 is considered good.

#### *Small Business Lending*

The bank's small business lending reflects good distribution to businesses of different sizes overall. In 2019, the bank made 72.4 percent of its small business loans to businesses with annual revenues of \$1 million or less, which far exceeded that of peer institutions (47.4 percent) but was below the demographic estimate of assessment area businesses with this revenue profile (90.9 percent), reflecting good performance.

In 2020, the bank made 30.5 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is slightly under the aggregate at 36.2 percent and significantly under the demographic at 91.2 percent. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 84.1 percent of total PPP loans had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness

to the needs of the small business community, as community contacts specializing in economic development noted the need for small dollar, small business loans. Therefore, distribution of loans to businesses of different revenue sizes is good in 2020, resulting in overall good performance across both years.

#### *Small Farm Lending*

Small farm lending to farms of different sizes in the assessment area is excellent in both years. In 2019, the bank originated 94.7 percent of its small farm loans to farms with annual revenues of \$1 million or less, which is significantly higher than aggregate lending level of 80.2 percent and near the demographic figure of 98.9 percent.

The bank's level of lending to small farms fell to 85.2 percent in 2020; however, it continued to exceed aggregate lending performance (79.3 percent) and approach the demographic figure (98.7 percent). Therefore, overall distribution remains excellent in 2020, resulting in excellent performance across both years.

#### **Geographic Distribution of Loans**

Overall, the geographic distribution of loans in the assessment area is excellent based on all three products reviewed, with small business lending receiving primary consideration, followed by HMDA then small farm lending.

#### *HMDA Lending*

The geographic distribution of HMDA loans during the review period is considered good in both years. In 2019, the bank originated the same percent of HMDA loans in low-income census tracts as the aggregate (2.1 percent) and a similar level to the area's owner-occupied units (2.2 percent), representing excellent performance. In moderate-income census tracts, the bank's distribution of HMDA loans (10.4 percent) is moderately lower than the aggregate performance (11.8 percent) as well as the demographic figure (14.7 percent); therefore, performance is adequate. Overall, distribution is good in LMI census tracts.

In 2020, the bank maintained good performance. In low-income census tracts, bank distribution (1.8 percent) moved slightly above that of the aggregate (1.7 percent) and slightly under the demographic figure (2.2 percent). Therefore, performance is good in low-income census tracts. In moderate-income census tracts, the distribution of HMDA loans at 9.1 percent is moderately lower than that of the aggregate percentage (10.0 percent) as well as the demographic figure (14.7 percent). Therefore, distribution remained adequate in moderate-income census tracts. Overall, the bank's combined HMDA lending performance to borrowers in LMI geographies is good.

#### *Small Business Lending*

The bank's small business lending reflects an excellent distribution to businesses by geography income level in both years. In 2019, the bank's distribution of small business loans in LMI census

tracts (3.2 percent and 25.1 percent, respectively) was greater than that of the aggregate figures (1.6 percent and 23.6 percent, respectively) as well as the percentage of businesses located in these tracts (2.2 percent and 24.4 percent, respectively). This reflects excellent distribution in both income categories.

This comparative performance was similar in 2020 where the bank's distribution in LMI census tracts (2.4 percent and 25.5 percent) was greater than the aggregate figures (1.8 percent and 23.6 percent) as well as the demographic figures (2.2 percent and 24.5 percent). This is especially noteworthy as community contacts cited small business loans as a credit need for the area, especially considering the significant presence of small businesses. Therefore, the bank's combined lending performance to small businesses in LMI geographies is excellent.

### *Small Farm Lending*

Based on the small number of farms in low-income census tracts, opportunities for small farm lending in low-income census tracts are de minimis in this assessment area; therefore, the bank's performance was based entirely on small farm lending in moderate-income census tracts.

The bank's lending reflects excellent distribution of small farm loans in LMI census tracts overall. In 2019, the bank originated 16.7 percent of its small farm loans in moderate-income census tracts, which is similar to the percentage of small farms in the area (16.4 percent) and aggregate performance (17.2 percent). Given the bank's performance compared to the demographic, distribution in moderate-income areas, and overall, is considered excellent.

In 2020, the bank's performance in moderate-income geographies (15.2 percent) was above the percentage of small farms in moderate-income areas (14.1 percent) and in line with the aggregate lending in moderate-income census tracts (15.8 percent). As a result, performance is also considered excellent in 2020. In light of its performance in comparison to the demographic in both years, overall distribution of small farm loans during the review period is excellent.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure and no conspicuous lending gaps in LMI areas were noted.

### **Community Development Lending Activities**

The Central Trust Bank makes a relatively high level of community development loans in the Springfield assessment area. During the review period, the bank originated or renewed 34 community development loans totaling \$51.7 million, including nine PPP loans with a community development purpose totaling \$4.5 million. When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination. Noteworthy loans are discussed following the table below.



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| Community Development Lending |                    |               |                    |              |                               |               |                      |              |           |               |
|-------------------------------|--------------------|---------------|--------------------|--------------|-------------------------------|---------------|----------------------|--------------|-----------|---------------|
|                               | Affordable Housing |               | Community Services |              | Revitalization/ Stabilization |               | Economic Development |              | Total     |               |
|                               | #                  | \$ (000s)     | #                  | \$ (000s)    | #                             | \$ (000s)     | #                    | \$ (000s)    | #         | \$ (000s)     |
| Community Development Loans   | 6                  | 10,696        | 4                  | 1,830        | 13                            | 32,230        | 2                    | 2,510        | 25        | 47,266        |
| PPP Loans                     | -                  | -             | 7                  | 2,659        | 2                             | 1,803         | -                    | -            | 9         | 4,462         |
| <b>TOTAL</b>                  | <b>6</b>           | <b>10,696</b> | <b>11</b>          | <b>4,489</b> | <b>15</b>                     | <b>34,033</b> | <b>2</b>             | <b>2,510</b> | <b>34</b> | <b>51,728</b> |

- The bank made 12 originations targeting revitalization and stabilization efforts in moderate-income census tracts in the city of Springfield that are also designated as empowerment zones, including one loan, totaling \$12.9 million, for the construction of a hotel and parking lot, which will create numerous permanent LMI jobs.
- Nine PPP loans totaling \$4.5 million qualified as community development and helped sustain businesses and nonprofits during the pandemic. These loans are considered particularly responsive to assessment area credit needs.
- Three revolving lines of credit totaling \$1.5 million were extended to an organization serving homeless youth.

## INVESTMENT TEST

The Central Trust Bank makes a significant level of qualified community development investments and grants in the Springfield assessment area. During the review period, the bank had 11 investments and 51 donations totaling \$5.3 million. Of that total, \$1.9 million were current-period investments, \$3.0 million were prior-period investments still outstanding, and \$442,526 were donations to various community development organizations. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were previously evaluated in an affiliate bank's CRA examination. Noteworthy loans are discussed following the table below.

| Community Development Investments |                    |              |                    |            |                               |           |                      |              |           |              |
|-----------------------------------|--------------------|--------------|--------------------|------------|-------------------------------|-----------|----------------------|--------------|-----------|--------------|
|                                   | Affordable Housing |              | Community Services |            | Revitalization/ Stabilization |           | Economic Development |              | Total     |              |
|                                   | #                  | \$ (000s)    | #                  | \$ (000s)  | #                             | \$ (000s) | #                    | \$ (000s)    | #         | \$ (000s)    |
| Investments                       | 8                  | 3,723        | 1                  | 100        |                               |           | 2                    | 1,069        | 11        | 4,892        |
| Donations                         | 3                  | 25           | 43                 | 385        | 3                             | 22        | 2                    | 11           | 51        | 443          |
| <b>TOTAL</b>                      | <b>11</b>          | <b>3,748</b> | <b>44</b>          | <b>485</b> | <b>3</b>                      | <b>22</b> | <b>4</b>             | <b>1,079</b> | <b>62</b> | <b>5,334</b> |

- A \$2.3 million investment was made in a low-income housing tax credit project that provides housing for LMI individuals with disabilities.
- Two investments in SBA loan funds were made, totaling \$1.1 million.

- Ten donations totaling \$163,500 were made to four organizations providing shelter and housing services for LMI individuals, including youth.
- Three donations totaling \$32,000 were made to organizations supporting small businesses in Springfield, including the downtown area, which was identified by community contacts as an area of need.

## SERVICE TEST

Service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Springfield assessment area, particularly LMI geographies and individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

### Accessibility of Delivery Systems

The bank operates 21 branches in the Springfield assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

| Branch Distribution by Geography Income Level |                        |            |             |            |           |            |
|---|------------------------|------------|-------------|------------|-----------|------------|
| Dataset                                       | Geography Income Level |            |             |            |           | TOTAL      |
|   | Low-                   | Moderate-  | Middle-     | Upper-     | Unknown-  |            |
| Branches                                      | 0<br>0.0%              | 7<br>33.3% | 11<br>52.4% | 3<br>14.3% | 0<br>0.0% | 21<br>100% |
| Census Tracts                                 | 5.5%                   | 25.3%      | 53.8%       | 14.3%      | 1.1%      | 100%       |
| Household Population                          | 4.3%                   | 20.7%      | 58.4%       | 16.2%      | 0.4%      | 100%       |

As shown in the previous table, the bank operates seven branches (33.3 percent) in moderate-income geographies, which is above the demographic data used for comparison. While the bank does not have any branches located in low-income geographies, only 4.3 of assessment area households live in low-income census tracts. In addition, the bank operates a standalone ATM in a low-income census tract. Overall, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels.

### Changes in Branch Locations

The bank added this assessment area and all branches therein as part of a merger with its affiliate banks during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. In the Springfield assessment area, an affiliate bank opened one new branch in an upper-income census tract and closed two branches (one in a middle-income and one in an upper-income geography). Therefore, the bank's

record of opening and closing branches in the assessment area has generally not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the Springfield assessment area. Branches are typically open from 9:00 a.m. to 5:00 p.m. Monday through Friday or similar, and all branches have open lobby hours on Saturday mornings, along with drive-up accessibility during those hours and loans officers on site. Lastly, eight branches have ITMs with availability Monday through Saturday from 7:00 a.m. to 7:00 p.m. (including three of seven LMI branches). Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provided a relatively high level of community development services in the assessment area during the review period. Despite challenges posed by the pandemic, 25 employees provided 849 hours of community development services to 22 different organizations benefitting the bank's assessment area. Services were provided to organizations promoting affordable housing, community services for LMI families and children, and economic development. As with the Lending Test, consideration was given to the exclusion of certain community development services that were previously evaluated in an affiliate bank's CRA examination. Impactful services are described below the following table:

| <b>Community Development Services</b> |                           |                           |                                      |                             |              |
|---------------------------------------|---------------------------|---------------------------|--------------------------------------|-----------------------------|--------------|
|                                       | <b>Affordable Housing</b> | <b>Community Services</b> | <b>Revitalization/ Stabilization</b> | <b>Economic Development</b> | <b>Total</b> |
| Service Hours                         | 72                        | 594                       | 79                                   | 105                         | <b>849</b>   |
| Organizations Benefitted              | 1                         | 15                        | 2                                    | 4                           | <b>22</b>    |

- Nine employees provided 310 hours of service as board members of eight organizations that specialize in providing community services, such as shelter, food, and education.
- Three senior officers dedicated 136 hours serving as president or vice president of organizations providing clothing, housing, and academic support to LMI children.
- In various capacities, four employees lent 118 hours of financial expertise to organizations that promote economic development.

## MID-MISSOURI NONMETROPOLITAN STATISTICAL AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MID-MISSOURI NONMSA ASSESSMENT AREA

The bank's Mid-Missouri assessment area is composed of Audrain, Camden, Johnson, Miller, Morgan, Pettis, and Randolph Counties. The bank's branch network consists of 20 offices, all of which are full-service facilities. This represents a net increase of 19 branches since the previous CRA exam as a result of a merger with its affiliate banks and the closure of one branch in a middle-income census tract post-merger. In addition to branches, the bank operates one LPO, 16 standalone ATMs, and one standalone ITM. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

| <b>Assessment Area Demographics by Population Income Level</b> |                                |                  |                 |                 |                              |
|--|--------------------------------|------------------|-----------------|-----------------|------------------------------|
| <b>Demographic Type</b>  | <b>Population Income Level</b> |                  |                 |                 | <b>TOTAL</b>                 |
|  | <b>Low-</b>                    | <b>Moderate-</b> | <b>Middle-</b>  | <b>Upper-</b>   |                              |
| Family Population  | 10,663<br>18.2%                | 9,841<br>16.8%   | 11,856<br>20.2% | 26,331<br>44.9% | <b>58,700</b><br><b>100%</b> |
| Household Population   | 18,499<br>21.1%                | 13,848<br>15.8%  | 15,321<br>17.4% | 40,169<br>45.7% | <b>87,837</b><br><b>100%</b> |

| <b>Assessment Area Demographics by Geography Income Level</b> |                               |                  |                 |                 |                 |                              |
|---|-------------------------------|------------------|-----------------|-----------------|-----------------|------------------------------|
| <b>Dataset</b>  | <b>Geography Income Level</b> |                  |                 |                 |                 | <b>TOTAL</b>                 |
|   | <b>Low-</b>                   | <b>Moderate-</b> | <b>Middle-</b>  | <b>Upper-</b>   | <b>Unknown-</b> |                              |
| Census Tracts   | 1<br>1.9%                     | 5<br>9.3%        | 35<br>64.8%     | 13<br>24.1%     | 0<br>0.0%       | <b>54</b><br><b>100%</b>     |
| Family Population   | 494<br>0.8%                   | 4,753<br>8.1%    | 36,185<br>61.6% | 17,268<br>29.4% | 0<br>0.0%       | <b>58,700</b><br><b>100%</b> |
| Household Population  | 743<br>0.9%                   | 8,214<br>9.4%    | 54,917<br>62.5% | 23,963<br>27.3% | 0<br>0.0%       | <b>87,837</b><br><b>100%</b> |
| Business Institutions   | 53<br>0.5%                    | 1,153<br>11.8%   | 60,43<br>61.8%  | 2,524<br>25.8%  | 0<br>0.0%       | <b>9,773</b><br><b>100%</b>  |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MID-MISSOURI NONMSA ASSESSMENT AREA****LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope assessment areas, as displayed in the following table. When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| <b>Lending Test Criteria</b>                | <b>Performance</b> |
|---|--------------------|
| Lending Activity                            | Consistent         |
| Distribution of Loans by Borrower's Profile | Consistent         |
| Geographic Distribution of Loans            | Consistent         |
| Community Development Lending Activity      | Below              |
| <b>OVERALL</b>                              | <b>Consistent</b>  |

During the review period, the bank made 34 community development loans totaling \$13.1 million, including ten PPP loans with a community development purpose totaling \$5.8 million. These loans qualified for a community development purpose of affordable housing (16), economic development (8), revitalization/stabilization of LMI geographies (6), and community services (4).

**INVESTMENT TEST**

The bank's Investment Test performance in the Mid-Missouri nonMSA assessment area is consistent with the investment performance in the full-scope assessment areas. The bank made 19 total qualified investments totaling \$6.4 million. These loans qualified for a community development purpose of affordable housing (3) economic development (2), and community services (14). In addition, the bank made 56 donations totaling \$187,850 with a mix of community development purposes. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were evaluated as part of an affiliate bank's prior CRA examination.

**SERVICE TEST**

The bank's Service Test performance in this assessment area is consistent with the Service Test performance in the Missouri full-scope assessment areas, as detailed in the following table:

| <b>Service Test Criteria</b>                  | <b>Performance</b> |
|---|--------------------|
| Accessibility of Delivery Systems             | Exceeds            |
| Changes in Branch Locations                   | Consistent         |
| Reasonableness of Business Hours and Services | Below              |
| Community Development Services                | Consistent         |
| <b>OVERALL</b>                                | <b>Consistent</b>  |

Despite challenges posed by the pandemic, 22 employees provided 2,071 hours of community development services to 22 organizations during the review period. Fourteen bank employees served as board members of various organizations that provide housing to LMI individuals or promote economic development in LMI areas. Other employees lent their financial expertise to organizations that provide financial literacy training or education assistance to LMI children. As with the Lending and Investment Tests, consideration was given to the exclusion of certain community development services that were evaluated as part of an affiliate bank's prior CRA examination.

## COLUMBIA, MISSOURI METROPOLITAN STATISTICAL AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA ASSESSMENT AREA

This assessment area and all branches therein were added during the review period as part of a merger with an affiliate bank. The assessment area is composed of the entire Columbia, Missouri MSA, which includes Boone, Cooper, and Howard Counties. The bank's branch network consists of 15 offices, all of which are full-service facilities. In addition to branches, the bank operates seven stand-alone ATMs and one stand-alone ITM. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

| Assessment Area Demographics by Population Income Level |                         |                 |                 |                 |                              |
|---|-------------------------|-----------------|-----------------|-----------------|------------------------------|
| Demographic Type  | Population Income Level |                 |                 |                 | TOTAL                        |
|   | Low-                    | Moderate-       | Middle-         | Upper-          |                              |
| Family Population                                       | 9,516<br>21.1%          | 7,478<br>16.6%  | 9,835<br>21.8%  | 18,249<br>40.5% | <b>45,078</b><br><b>100%</b> |
| Household Population                                    | 20,279<br>26.3          | 11,607<br>15.0% | 12,401<br>16.1% | 32,910<br>42.6% | <b>77,197</b><br><b>100%</b> |

| Assessment Area Demographics by Geography Income Level |                        |                |                 |                 |               |                              |
|--|------------------------|----------------|-----------------|-----------------|---------------|------------------------------|
| Dataset  | Geography Income Level |                |                 |                 |               | TOTAL                        |
|  | Low-                   | Moderate-      | Middle-         | Upper-          | Unknown-      |                              |
| Census Tracts  | 3<br>8.1%              | 6<br>16.2%     | 18<br>48.6%     | 7<br>18.9%      | 3<br>8.1%     | <b>37</b><br><b>100%</b>     |
| Family Population                                      | 1048<br>2.3%           | 5185<br>11.5%  | 26354<br>58.5%  | 12194<br>27.1%  | 297<br>0.7%   | <b>45,078</b><br><b>100%</b> |
| Household Population                                   | 3,119<br>4.0%          | 9,884<br>12.8% | 41,749<br>54.1% | 19,621<br>25.4% | 2,824<br>3.7% | <b>77,197</b><br><b>100%</b> |
| Business Institutions                                  | 823<br>9.9%            | 1,034<br>12.4% | 3,946<br>47.4%  | 2,110<br>25.3%  | 414<br>5.0%   | <b>8,327</b><br><b>100%</b>  |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA****LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope assessment areas, as displayed in the following table. For this review period, a significant amount of retail lending data and community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| <b>Lending Test Criteria</b>                | <b>Performance</b> |
|---|--------------------|
| Lending Activity                            | Consistent         |
| Distribution of Loans by Borrower's Profile | Consistent         |
| Geographic Distribution of Loans            | Consistent         |
| Community Development Lending Activity      | Below              |
| <b>OVERALL</b>                              | <b>Consistent</b>  |

During the review period, the bank made eight community development loans totaling \$4.7 million, including one PPP loan for \$295,024. These loans qualified with a community development purpose of affordable housing (7) and community services (1). Noteworthy loans include the PPP loan made to an organization that provides housing and foster care services to the area's children.

**INVESTMENT TEST**

The bank's Investment Test performance in the Columbia assessment area is consistent with the investment performance in the full-scope assessment areas. The bank's qualified investments included four MBS supporting affordable housing and one investment in low-income housing tax credits, totaling \$4.3 million. These investments were made prior to the review period, but are still outstanding. The bank also made 26 qualified donations totaling \$41,350. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were previously evaluated in an affiliate bank's CRA examination.



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## SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the Service Test performance in the Missouri full-scope assessment areas, as detailed in the following table:

| <b>Service Test Criteria</b>                  | <b>Performance</b> |
|---|--------------------|
| Accessibility of Delivery Systems             | Consistent         |
| Changes in Branch Locations                   | Exceeds            |
| Reasonableness of Business Hours and Services | Consistent         |
| Community Development Services                | Below              |
| <b>OVERALL</b>                                | <b>Consistent</b>  |

During the review period, seven bank employees provided 234 hours of community development service activities to seven different organizations. Despite challenges posed by the pandemic, bank employees served in various roles, such as treasurer and board member, for several community service and nonprofit organizations throughout the assessment area. In addition to these activities, the bank offers free financial education classes and one-on-one financial counseling through its proprietary training program, ProsperU, based out of its Columbia classroom. During the pandemic, the bank continued offering training and one-on-one counseling sessions virtually. In 2021, the bank provided 268 one-on-one, hour-long counseling sessions, as well as a total of 203 classroom training hours benefitting 2,216 classroom attendees. As with the Lending and Investment Tests, consideration was given to the exclusion of certain community development services that were previously evaluated in an affiliate bank's CRA examination.

## BRANSON, MISSOURI NONMETROPOLITAN STATISTICAL AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BRANSON, MISSOURI NONMSA ASSESSMENT AREA

This assessment area and all branches therein were added during the review period as part of a merger with its affiliate banks. The Branson nonMSA assessment area is composed of Stone and Taney Counties, and the bank's branch network consists of five full-service offices. In addition to branches, the bank operates four standalone ATMs. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

| Assessment Area Demographics by Population Income Level |                         |           |         |        |               |
|---|-------------------------|-----------|---------|--------|---------------|
| Demographic Type  | Population Income Level |           |         |        | TOTAL         |
|   | Low-                    | Moderate- | Middle- | Upper- |               |
| Family  | 4,209                   | 4,698     | 5,456   | 8,835  | <b>23,198</b> |
| Population  | 18.1%                   | 20.3%     | 23.5%   | 38.1%  | <b>100%</b>   |
| Household   | 7,192                   | 6,029     | 6,844   | 14,071 | <b>34,136</b> |
| Population  | 21.1%                   | 17.7%     | 20.1%   | 41.2%  | <b>100%</b>   |

| Assessment Area Demographics by Geography Income Level |                        |           |         |        |          |               |
|--|------------------------|-----------|---------|--------|----------|---------------|
| Dataset  | Geography Income Level |           |         |        |          | TOTAL         |
|  | Low-                   | Moderate- | Middle- | Upper- | Unknown- |               |
| Census Tracts  | 0                      | 1         | 14      | 1      | 0        | <b>16</b>     |
|  | 0.0%                   | 6.3%      | 87.5%   | 6.3%   | 0.0%     | <b>100%</b>   |
| Family   | 0                      | 1,922     | 20,221  | 1,055  | 0        | <b>23,198</b> |
| Population   | 0.0%                   | 8.3%      | 87.2%   | 4.6%   | 0.0%     | <b>100%</b>   |
| Household  | 0                      | 2,942     | 29,753  | 1,441  | 0        | <b>34,136</b> |
| Population   | 0.0%                   | 8.6%      | 87.2%   | 4.2%   | 0.0%     | <b>100%</b>   |
| Business   | 0                      | 279       | 3,716   | 238    | 0        | <b>4,233</b>  |
| Institutions   | 0.0%                   | 6.6%      | 87.8%   | 5.6%   | 0.0%     | <b>100%</b>   |

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BRANSON, MISSOURI NONMSA ASSESSMENT AREA

### LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| <b>Lending Test Criteria</b>                | <b>Performance</b> |
|---|--------------------|
| Lending Activity                            | Consistent         |
| Distribution of Loans by Borrower's Profile | Below              |
| Geographic Distribution of Loans            | Exceeds            |
| Community Development Lending Activity      | Below              |
| <b>OVERALL</b>                              | <b>Consistent</b>  |

During the review period, the bank made four community development loans totaling \$1.3 million. These loans qualified for a community development purpose of affordable housing (3) and revitalization/stabilization of LMI geographies (1). When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination.

### INVESTMENT TEST

The bank's investment performance in this assessment area is below the investment performance in the Missouri full-scope assessment areas. During the review period, the bank made six qualified community development investments totaling \$2.1 million. Three of the investments were made during the current period and supported local school districts. The remaining three were made prior to this review period but had remaining balances that qualified this period. In addition, the bank made 14 community development donations totaling \$38,025. These donations supported multiple school districts where majority of the students are LMI and an organization dedicated to economic development in moderate-income and distressed or underserved middle-income areas. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were previously evaluated in an affiliate bank's CRA examination.

### SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance in the Missouri full-scope assessment areas, as detailed in the following table:

| <b>Service Test Criteria</b>                  | <b>Performance</b> |
|---|--------------------|
| Accessibility of Delivery Systems             | Exceeds            |
| Changes in Branch Locations                   | Exceeds            |
| Reasonableness of Business Hours and Services | Below              |
| Community Development Services                | Below              |
| <b>OVERALL</b>                                | <b>Consistent</b>  |

Despite challenges posed by the pandemic, eight employees provided 333 hours to nine organizations during the review period. Six bank employees served as board members or as the president of various organizations that provide housing to LMI individuals or promote economic development in LMI areas. Other employees lent their financial expertise to organizations that provide financial literacy training to LMI individuals. As with the Lending and Investment Tests, consideration was given to the exclusion of certain community development services that were previously evaluated in an affiliate bank's CRA examination.

## KANSAS CITY, MISSOURI – KANSAS – LAWRENCE, KANSAS COMBINED MULTISTATE METROPOLITAN STATISTICAL AREA<sup>2</sup>

### CRA RATING FOR KANSAS CITY:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**Satisfactory**

**High Satisfactory**

**Low Satisfactory**

**Low Satisfactory**

Major factors supporting the institution's Kansas City rating include the following.

- The bank's lending levels reflect adequate responsiveness to the credit needs of its assessment area.
- The distribution of loans by borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment area.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment area.
- The bank makes an adequate level of qualified community development investments and grants.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.
- Record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services.

<sup>2</sup> This rating reflects performance within the multistate MSA. The Missouri and Kansas statewide evaluations are adjusted and do not reflect performance in the multistate MSA.

**SCOPE OF EXAMINATION**

Scoping considerations applicable to the review of the Kansas City assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Based on loan demand and the bank's lending activity, small business and HMDA lending received the greatest weight in the analysis, followed by small farm lending.

The Kansas City assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contacts were used to ascertain specific community credit needs and provide context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the section that follows.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KANSAS CITY ASSESSMENT AREA****Bank Structure**

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates 49 of its offices in its Kansas City assessment area, representing 31.8 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| <b>Number of Delivery Systems by Census Tract Classification</b> |                   |                        |                      |                     |
|--|-------------------|------------------------|----------------------|---------------------|
|  | <b>Low-Income</b> | <b>Moderate-Income</b> | <b>Middle-Income</b> | <b>Upper-Income</b> |
| Offices  | 0                 | 15                     | 25                   | 9                   |

In addition to branches, the bank operates two LPOs, 21 standalone ATMs, and one standalone ITM. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area.

**General Demographics**

The bank's Kansas City assessment area consists of the Missouri counties of Cass, Clay, Clinton, Jackson, Lafayette, Platte, and Ray, and the Kansas counties of Douglas, Johnson, and Wyandotte, ten of the 22 counties that make up with the Kansas City – Overland Park – Kansas City, Missouri – Kansas Combined Statistical Area (CSA). While the bank has designated two assessment areas, they are combined as the Kansas City assessment area for purposes of this evaluation.

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The assessment area's population as of the 2015 U.S. Census is shown in the following table:

| State                                   | County                     | Population       | Percent Change |
|---|----------------------------|------------------|----------------|
| Missouri                                | Cass County, Missouri      | 100,781          | 1.31%          |
|   | Clay County, Missouri      | 230,361          | 3.79%          |
|   | Clinton County, Missouri   | 20,498           | -1.18%         |
|   | Jackson County, Missouri   | 680,905          | 1.00%          |
|   | Lafayette County, Missouri | 32,916           | -1.39%         |
|   | Platte County, Missouri    | 93,394           | 4.56%          |
|   | Ray County, Missouri       | 23,031           | -1.97%         |
| Kansas                                  | Johnson County, Kansas     | 566,814          | 4.16%          |
|   | Wyandotte County, Kansas   | 160,806          | 2.10%          |
|   | Douglas County, Kansas     | 114,967          | 3.74%          |
| <b>TOTAL ASSESSMENT AREA POPULATION</b> |                            | <b>1,975,025</b> | <b>2.43%</b>   |

Concentrations of residents are found in Jackson County, Missouri, and Johnson County, Kansas, where each state's most populous cities are located, Kansas City and Overland Park, respectively. The assessment area is largely urban, though several of the outlying counties are more rural in nature.

The bank's Kansas City assessment area is a highly competitive banking market with 122 FDIC-insured financial institutions in the area operating 661 offices. According to the FDIC's Deposit Market Share Report of June 30, 2021, The Central Trust Bank is ranked sixth among these financial institutions, holding 4.1 percent of the assessment area's deposit market share.

Along with the population figures shown in the preceding table, the assessment area has 94,774 businesses, 85,705 of which are small businesses (90.4 percent). As the assessment area covers a wide metropolitan area, and the demographics reflect an economically diverse population, credit needs in the area are significant and varied. Community contacts noted particular needs for affordable owner-occupied housing, down payment assistance programs for consumers, microloans for small businesses, and financial literacy and small businesses counseling services.

### **Income and Wealth Demographics**

The following table summarizes the assessment area's distribution of census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level |        |           |         |         |          |                |
|--|--------|-----------|---------|---------|----------|----------------|
| Dataset  | Low-   | Moderate- | Middle- | Upper-  | Unknown- | TOTAL          |
| Census Tracts  | 80     | 118       | 168     | 135     | 19       | <b>520</b>     |
|  | 15.4%  | 22.7%     | 32.3%   | 26.0%   | 3.7%     | <b>100%</b>    |
| Family Population                                      | 39,251 | 102,651   | 195,458 | 168,301 | 988      | <b>506,649</b> |
|  | 7.8%   | 20.3%     | 38.6%   | 33.2%   | 0.2%     | <b>100%</b>    |

As shown above, 38.1 percent of the census tracts in the assessment area are LMI geographies, but only 28.0 percent of the family population resides in these tracts. A significant portion of the LMI census tracts are concentrated in downtown Kansas City and the Lawrence MSA (Douglas County).

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According to 2015 ACS data, the median family income for the assessment area was \$72,589. At the same time, the median family incomes for the state of Missouri and state of Kansas were \$60,809 and \$66,389, respectively. The following table displays population percentages of assessment area families by income level compared to the states of Kansas and Missouri.

| Family Population by Income Level |         |           |         |         |                  |
|-----------------------------------|---------|-----------|---------|---------|------------------|
| Dataset                           | Low-    | Moderate- | Middle- | Upper-  | TOTAL            |
| Kansas City                       | 107,719 | 89,025    | 103,430 | 206,475 | <b>506,649</b>   |
|                                   | 21.3%   | 17.6%     | 20.4%   | 40.8%   | <b>100%</b>      |
| Kansas                            | 137,650 | 128,930   | 154,601 | 308,287 | <b>729,468</b>   |
|                                   | 18.9%   | 17.7%     | 21.2%   | 42.3%   | <b>100%</b>      |
| Missouri                          | 327,271 | 274,380   | 319,267 | 609,088 | <b>1,530,006</b> |
|                                   | 21.4%   | 17.9%     | 20.9%   | 39.8%   | <b>100%</b>      |

The table above shows that a significantly higher percentage of families in the assessment area are LMI (38.9 percent) than reside in LMI geographies (28.0 percent). Overall, the percentage of families in the assessment area that are considered LMI is marginally lower than in Missouri (39.3 percent) and slightly higher than in Kansas (36.6 percent). Furthermore, the percentage of families living below the poverty level in the assessment area (9.1 percent) is the same as that of Kansas and lower than that of Missouri (11.1 percent). These LMI percentages indicate that the assessment area is similar in affluence to Kansas and marginally more affluent than Missouri. However, affluence differs among the counties comprising the assessment area, with Wyandotte and Jackson Counties reporting the highest level of families that are LMI and living below poverty, and Johnson and Platte Counties reporting the lowest levels.

### Housing Demographics

The following table displays key housing demographics for the assessment area and the states of Kansas and Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

| Housing Demographics |                      |                     |                             |  |
|----------------------|----------------------|---------------------|-----------------------------|--|
| Dataset              | Median Housing Value | Affordability Ratio | Median Gross Rent (Monthly) | Housing Cost Burden (Renters   Owners) |
| Kansas City          | \$161,061            | 35.5%               | \$848                       | 40.6%   17.1%                          |
| Kansas               | \$132,000            | 39.6%               | \$757                       | 38.8%   16.3%                          |
| Missouri             | \$138,400            | 34.8%               | \$746                       | 40.1%   17.4%                          |

Across all measures of affordability, housing is less affordable in the assessment area than in the state of Kansas and similarly affordable in the state of Missouri. As with income levels, housing affordability varies by county. Based on affordability ratios, housing is most affordable in Wyandotte and Ray Counties (45.0 percent and 43.7 percent, respectively), though income data indicates homeownership may be out of reach for some individuals, namely residents of Wyandotte, due to high poverty rates. In addition, the aging housing stock in Wyandotte (55 years



old) creates the need for home improvement loans to maintain housing, which many LMI families cannot afford. Conversely, the ratios show that housing is least affordable in Douglas and Johnson counties (28.3 percent and 35.3 percent, respectively).

Community contacts explain that there is a high percentage of rental properties in Douglas County, partly due to student renters attending the University of Kansas. They also note that Johnson County has experienced significant growth in its housing market as affluent families move further from the city, which has impacted housing affordability. Across the assessment area, the largest barrier to home ownership is the rising cost of homes. Given the large percentage of people working in the service industry, many residents simply do not have the income to purchase homes at current prices. The pandemic has further exacerbated a tight housing market, making home purchase even more difficult for LMI individuals.

### **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data that estimates 90.4 percent of businesses in the area have gross annual revenues of less than \$1 million. Community contacts note that downtown Kansas City, Missouri, and Johnson County, Kansas, are especially supportive of small businesses, benefitting from a supportive ecosystem with governmental, private sector, and financial institutions working together to meet the needs of entrepreneurs. In addition, Johnson County is one of the faster-growing and more affluent areas in the assessment area with access to capital and potential business. County business patterns indicate there are 980,156 paid employees in the assessment area. By percentage of employees, the three largest job categories are government (13.6 percent), healthcare and social assistance (13.3 percent), and retail trade (10.6 percent). Community contacts point to universities and hospitals as some of the major employers in the area.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

| <b>Unemployment Data</b> |                            |                            |                            |
|--------------------------|----------------------------|----------------------------|----------------------------|
| <b>Dataset</b>           | <b>2019 Annual Average</b> | <b>2020 Annual Average</b> | <b>2021 Annual Average</b> |
| Kansas City              | 3.2%                       | 6.1%                       | 4.4%                       |
| Kansas                   | 3.2%                       | 5.9%                       | 3.2%                       |
| Missouri                 | 3.3%                       | 6.1%                       | 4.4%                       |

As shown in the preceding table, unemployment levels in the assessment area were similar to those of Kansas and Missouri states during the review period. Again, the levels varied by county with highest unemployment found in Wyandotte and Jackson Counties (4.4 percent and 3.7 percent, respectively) both years and the lowest levels found in Johnson and Platte Counties (2.8 percent and 2.7 percent, respectively) in 2019 and Johnson and Lafayette Counties (5.1 percent and 5.3 percent, respectively) in 2020. Across all counties, unemployment levels significantly increased in 2020 in line with the national unemployment trend resulting from the impact of the pandemic. The largest increase was in Wyandotte and Jackson Counties where service industry jobs are more

prevalent and were unavailable due to business closures. As shown in the table, unemployment levels in 2021 trended downward toward their pre-pandemic levels.

The community contacts indicated that credit needs for small businesses in the area include start-up capital, microloans, and financial education. In addition, contacts noted that while many LMI families seem to earn livable wages, they continue to struggle financially due to the costs of childcare and transportation. Barriers for small business are funding and small dollar startup loans (\$5,000 or less) to get business off the ground.

### **Community Contact Information**

For this assessment area, two community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. One interview was with a representative from an economic development organization that is knowledgeable about affordable housing. The other was with an individual representing an organization that advocates for small businesses in the area.

The contacts described the overall economy as growing in size and diversity, citing transportation, professional services, education, and health services as the major industries. Contacts explained that COVID-19 has impacted the community similarly to how other areas of the country were impacted, most notably in the fact that service industry jobs have struggled due to shutdowns and trying to meet the evolving needs and expectations of customers. Overall, the area has been fortunate in that very few businesses had to close permanently due to the pandemic, and there has not been a major loss of job opportunities as a result. Though the economy has remained strong, contacts noted that there are still pockets of concentrated poverty and lower-income areas throughout Kansas City that have not experienced the same growth rates as the rest of the assessment area. These areas tend to be concentrated in the southeast portion of the assessment area and in eastern Wyandotte and Johnson Counties.

Regarding small businesses, contacts described the economic environment as good. A lot of effort has been put toward building up small businesses, including the establishment of a new technical school aimed at equipping future entrepreneurs to open their own businesses upon graduation. In addition, traditional colleges and universities, the Small Business Development Center, the SBA, and the Chamber of Commerce are also valuable resources to small business owners, offering services such as business plan development and management training. These resources are essential to entrepreneurs, and community contacts identify them as a continued top need for the area. In addition to educational support, funding is also a top need. Small business owners can find funding through microlenders and private investors, though contacts cite the need for more small dollar loans in the assessment area, specifically in amounts of \$2,500 to \$250,000. They also believe that businesses with \$50,000 or less in sales need the most support in the area.

Regarding affordable housing, contacts stated that conditions are good, though LMI individuals find it more challenging to obtain affordable housing in some areas over others. Newer affordable housing is limited, and there is an overall shortage of affordable housing to adequately meet their needs. Contacts state that the largest barrier to home ownership is the rising cost of homes. Given the large percentage of people working in the service industry, many residents simply do not have

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the income to purchase homes at current prices. The pandemic has further exacerbated a tight housing market, making home purchase even more difficult for LMI individuals. Contacts believe that more partnerships with financial institutions and affordable housing development commissions would benefit the area.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY ASSESSMENT AREA****LENDING TEST**

The bank's Lending Test rating in the Kansas City assessment area is High Satisfactory. Lending levels reflect adequate responsiveness to the credit needs of the Kansas City assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Additionally, the bank makes an adequate level of community development loans in this assessment area.

For this review period, the majority of 2019 lending data and community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance.

**Lending Activity**

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume. As the majority of 2019 data was evaluated in an affiliate's prior CRA examination, the displayed data is largely from 2020.

| <b>Summary of Lending Activity<br/>January 1, 2019 through December 31, 2020</b> |              |               |                  |               |
|--|--------------|---------------|------------------|---------------|
| <b>Loan Type</b>   | <b>#</b>     | <b>%</b>      | <b>\$ (000s)</b> | <b>%</b>      |
| Home Improvement   | 15           | 0.3%          | 1,621            | 0.2%          |
| Home Purchase  | 421          | 8.6%          | 89,771           | 13.0%         |
| Multifamily Housing  | 18           | 0.4%          | 49,550           | 7.2%          |
| Refinancing  | 601          | 12.2%         | 135,732          | 19.7%         |
| Other  | 17           | 0.3%          | 2,412            | 0.4%          |
| <b>TOTAL HMDA</b>  | <b>1,064</b> | <b>21.6%</b>  | <b>278,620</b>   | <b>40.4%</b>  |
| <b>Small Business</b>  | <b>3,537</b> | <b>71.8%</b>  | <b>388,648</b>   | <b>56.4%</b>  |
| <b>Small Farm</b>  | <b>322</b>   | <b>6.5%</b>   | <b>21,685</b>    | <b>3.1%</b>   |
| <b>TOTAL LOANS</b>   | <b>4,923</b> | <b>100.0%</b> | <b>688,953</b>   | <b>100.0%</b> |

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The 2019 data used in this evaluation shows that of the bank's total HMDA and CRA loans made in its combined assessment areas, 2.5 percent by number and 15.9 percent by dollar were made in the Kansas City assessment area, which is significantly lower than the percentage of total bank deposits held (22.2 percent by dollar) and the percentage of total bank branches located in the assessment area (31.8 percent). However, due to the exclusion of the majority of 2019 data, 2020 data is considered a more accurate representation of bank performance, which reveals that of the bank's total HMDA and CRA loans made in the bank's combined assessment areas, 16.9 percent by number and 15.9 percent by dollar were made in Kansas City. In addition, reportable lending data in 2020 shows that the bank ranked 40<sup>th</sup> out of 661 HMDA aggregate lenders and 5<sup>th</sup> out of

232 CRA aggregate lenders. In light of this level of lending compared to its significant branch presence and deposits held in the area, the bank's responsiveness to area needs is considered adequate.

### **Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the Kansas City assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining overall conclusions, HMDA and small business loans are given more weight than small farm lending.

#### *HMDA Lending*

In both 2019 and 2020, the bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals.

A review of the applicable 2019 data shows that the percentage of loans to low-income borrowers (8.8 percent) was above the percentage of aggregate HMDA loans (8.2 percent) and below the percentage of families in the assessment area that are low income (21.3 percent), reflecting good performance. The distribution of loans to moderate-income borrowers (20.6 percent) was higher than both the aggregate (18.4 percent) and demographic (17.6 percent) figures, which is considered excellent. Given the high percentage of low-income families in the assessment area, more weight is given to the bank's performance relative to borrowers with that income level; therefore, overall distribution in 2019 is good.

In 2020, the bank's distribution of loans to low-income borrowers (8.8 percent) remained above the aggregate level (6.5 percent) and below the demographic figure (21.3 percent), demonstrating good performance. The distribution of loans to moderate-income borrowers (14.8 percent) fell slightly below the aggregate and demographic figures (17.6 percent each), which is considered adequate. As a larger percentage of families are low income versus moderate income, more weight is given to performance with respect to low-income borrowers. Therefore, overall distribution in 2020 is considered good.

#### *Small Business Lending*

When considering performance from both years, the bank's overall distribution of small business loans to businesses of different sizes is adequate.

In 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less (81.6 percent) exceeded that of peer institutions (46.2 percent) and neared the estimated percentage of businesses with this revenue profile (90.2 percent) in this assessment area. Therefore, overall distribution in 2019 is good.

In 2020, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less (22.0 percent) was below both the aggregate (37.4 percent) and demographic

(90.4 percent) figures. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 65.7 percent of total PPP loans had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, as community contacts noted the need for small dollar, small business loans. Therefore, distribution of loans to businesses of different revenue sizes is adequate in 2020.

Given the exclusion of the majority of 2019 lending data, the bank's performance in 2020 is given more weight and is, therefore, considered adequate.

#### *Small Farm Lending*

Small farm lending to farms of different sizes in the assessment area is good overall. In 2019, the bank's percentage of small farm loans to farms with annual revenues of \$1 million or less (93.9 percent) was significantly higher than aggregate lending level (57.5 percent) and near the demographic figure (97.7 percent), demonstrating excellent performance.

The bank's level of lending to farms with this revenue profile fell to 74.0 percent in 2020; however, it continued to exceed aggregate lending performance (56.6 percent) and approach the demographic figure (97.6 percent). Therefore, overall distribution is considered good in 2020.

Given the exclusion of the majority of 2019 lending data, the bank's performance in 2020 is given more weight and the overall borrower distribution for small farms is, therefore, considered good.

#### **Geographic Distribution of Loans**

The bank's geographic distribution of loans in the Kansas City assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining overall conclusions, HMDA and small business loans are given more weight than small farm lending.

#### *HMDA Lending*

The geographic distribution of HMDA loans during the review period is considered good. In 2019, the bank originated 7.4 percent of its HMDA loans in low-income census tracts as compared to 2.7 percent originated by peer institutions in the assessment area and the percentage of owner-occupied housing units that are in low-income census tracts (5.7 percent), reflecting excellent performance. The bank's distribution of HMDA loans in moderate-income census tracts (11.8 percent) is lower than the aggregate (15.0 percent) and the demographic (18.0 percent) figures, reflecting adequate performance. Therefore, overall distribution in LMI census tracts in 2019 is good.

In 2020, the bank's distribution of loans in low-income census tracts (3.2 percent) fell below the demographic figure (5.7 percent), but remained above the aggregate level (2.3 percent), demonstrating good performance. In moderate-income census tracts, the bank's distribution of HMDA loans increased to 12.4 percent, which is in line with the aggregate (12.8 percent) and below the demographic (18.0 percent), and is considered good. Therefore, overall distribution in LMI census tracts in 2020 is good.

### *Small Business Lending*

Overall, the distribution of small business loans in LMI census tracts is good. In 2019, the bank's level of small business lending in low- and moderate-income census tracts (3.9 percent and 11.8 percent, respectively) was lower than the aggregate level (6.5 percent and 18.1 percent, respectively) as well as the percentage of small businesses located in LMI income census tracts (7.0 percent and 20.1 percent, respectively), reflecting poor performance in both income categories. However, as previously explained, the majority of the bank's 2019 data is excluded from this evaluation; therefore, limited weight is given performance in 2019.

In 2020, the bank's percentage of loans originated in low-income census tracts (4.1 percent) was slightly lower than the aggregate (6.5 percent) and demographic (7.0 percent) figures, indicating adequate performance. In moderate-income census tracts, the bank's distribution (22.8 percent) was greater than that of the aggregate (18.9 percent) and demographic (20.2 percent) figures, which is considered excellent. Therefore, overall distribution in 2020 is good. Given the exclusion of portions of 2019 data, 2020 performance is given more weight; therefore, overall distribution of small business loans in LMI census tracts is good.

### *Small Farm Lending*

Overall, the bank's lending reflects good distribution of small farm loans in LMI census tracts. In 2019, the bank did not originate any small farm loans in the low-income census tracts, while aggregate lenders originated 1.2 percent of small farm loans in these tracts where 1.4 percent of all small farms in the assessment area are located. Though the bank lacked small farm loan originations in low-income census tracts, there are limited opportunities available for small farm lending in those areas; therefore, performance is considered adequate. In moderate-income census tracts, the bank originated a higher percentage of small farm loans (17.5 percent) than both the aggregate level (11.9 percent) and the demographic figure (12.4 percent), reflecting excellent performance. As a result, overall performance in 2019 is considered good.

In 2020, the bank originated one small farm loan (0.5 percent of small farm loans originated in the assessment area) in low-income census tracts, which is in line with the aggregate level (0.8 percent) and slightly below the demographic figure (1.3 percent). Given the limited opportunities for small farm lending, this distribution is considered adequate. In moderate-income census tracts, the bank's small farm loan distribution (10.1 percent) was in line with the aggregate figure (10.6 percent) and approached the demographic figure (12.2 percent), reflecting good performance. With more opportunities for small farm lending in moderate-income census tracts, more weight is given to performance in those areas; therefore, overall distribution in 2020 is considered good.

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Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure, and no conspicuous lending gaps in LMI areas were noted.

### **Community Development Lending Activities**

The Central Trust Bank makes an adequate level of community development loans in the Kansas City assessment area. During the review period, the bank originated or renewed 14 community development loans for \$54.4 million, including one PPP loan for \$111,667. When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination. The most notable loans are discussed following the table below.

| <b>Community Development Lending</b> |                           |                  |                           |                  |                                      |                  |                             |                  |              |                  |
|--------------------------------------|---------------------------|------------------|---------------------------|------------------|--------------------------------------|------------------|-----------------------------|------------------|--------------|------------------|
|                                      | <b>Affordable Housing</b> |                  | <b>Community Services</b> |                  | <b>Revitalization/ Stabilization</b> |                  | <b>Economic Development</b> |                  | <b>TOTAL</b> |                  |
|                                      | <b>#</b>                  | <b>\$ (000s)</b> | <b>#</b>                  | <b>\$ (000s)</b> | <b>#</b>                             | <b>\$ (000s)</b> | <b>#</b>                    | <b>\$ (000s)</b> | <b>#</b>     | <b>\$ (000s)</b> |
| Community Development Loans          | 6                         | \$3,015          | 1                         | \$3,835          | 5                                    | \$44,470         | 1                           | \$3,001          | 13           | \$54,322         |
| PPP Loans                            | -                         | -                | 1                         | \$112            | -                                    | -                | -                           | -                | 1            | 112              |
| <b>TOTAL</b>                         | <b>6</b>                  | <b>\$3,015</b>   | <b>2</b>                  | <b>\$3,947</b>   | <b>5</b>                             | <b>\$44,470</b>  | <b>1</b>                    | <b>\$3,001</b>   | <b>14</b>    | <b>\$54,433</b>  |

- One construction loan totaling \$30.7 million to build an apartment in a moderate-income census tract designated as an exclusive economic zone (EEZ) in Kansas City, which will serve to attract and retain residents in the area.
- Two loans totaling \$9.5 million for the purchase or renovation of commercial properties located in low-income census tracts that are designated EEZs in Kansas City, which will serve to attract and retain businesses.
- One PPP loan for \$111,667 qualified as community development and helped sustain a nonprofit that provides services to homeless and high-risk youth.

### **Product Innovation**

The bank makes extensive use of flexible lending practices in serving the credit needs of the Kansas City assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Kansas City is described below:



- Through the SBA's PPP, the bank originated 4,062 PPP loans totaling \$369.5 million in its Kansas City assessment area and nearby geographies. According to metrics provided by the SBA, the bank ranked first in 2020 and fourth in 2021 in number of originations among all lenders participating in the program. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those in Kansas City.
- Specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas, the bank's Home Turf Program allows eligible borrowers to make a reduced minimum down payment using flexible sources of payment. From January 1, 2019, through December 31, 2021, the bank originated 45 mortgage loans, totaling \$4.7 million in the assessment area.
- Through the Missouri Housing Development Commission Loan Program, which helps LMI families with closing cost and down payment assistance, the bank originated 24 loans totaling \$3.3 million in Kansas City from 2019 through 2021.
- The bank originated a significant volume of mortgage loans through the Fannie Mae HomeReady Loan Program, which targets LMI individuals and offers lower down payment requirements than traditional conventional loans. From 2019 through 2021, the bank originated 14 HomeReady loans, totaling \$2.4 million, in Kansas City.
- From 2019 through 2021, the bank originated 52 loans, totaling \$31.5 million through the SBA-CDC/504 Loan Program and the SBA 7(a) Loan Program in its Kansas City assessment area. Through these programs, the bank offered small business loans that support small business operations and/or expansion.
- Though various programs, including the USDA FSA and RD Programs, the bank originated nine farm loans, totaling \$11.7 million, in Kansas City from 2019 through 2021. These loans are tailored to the needs of farmers and ranchers, including those who own small farms.
- The bank also originated a significant volume of mortgage loans through government loan programs in Kansas City, including 81 FHA loans, totaling \$13.9 million, nine RD home loans (\$1.2 million), and 29 VA loans (\$7.6 million).

## INVESTMENT TEST

The bank's Investment Test rating in the Kansas City assessment area is Low Satisfactory. The Central Trust Bank made an adequate level of qualified community development investments and grants in the assessment area. For this review period, the majority of 2019 community development

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activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. During the applicable review period, the bank made 17 investments and 45 donations totaling \$6.3 million that benefitted the assessment area. Of that, \$3.7 million were current-period investments, \$2.2 million were prior-period investments still outstanding, and \$386,250 were donations to various community development organizations. Noteworthy investments are discussed following the table below.

| Community Development Investments |                    |                |                    |                |                                  |           |                         |                |           |                |
|-----------------------------------|--------------------|----------------|--------------------|----------------|----------------------------------|-----------|-------------------------|----------------|-----------|----------------|
|                                   | Affordable Housing |                | Community Services |                | Revitalization/<br>Stabilization |           | Economic<br>Development |                | TOTAL     |                |
|                                   | #                  | \$ (000s)      | #                  | \$ (000s)      | #                                | \$ (000s) | #                       | \$ (000s)      | #         | \$ (000s)      |
| Investments                       | 8                  | \$1,210        | 4                  | \$1,000        | -                                | -         | 5                       | \$3,737        | 17        | \$5,948        |
| Donations                         | 7                  | \$265          | 31                 | \$107          | -                                | -         | 7                       | \$15           | 45        | \$386          |
| <b>TOTAL</b>                      | <b>15</b>          | <b>\$1,475</b> | <b>35</b>          | <b>\$1,107</b> | <b>-</b>                         | <b>-</b>  | <b>12</b>               | <b>\$3,752</b> | <b>62</b> | <b>\$6,334</b> |

- Three investments totaling \$3.2 million funding small businesses in Jackson County.
- Four municipal bonds totaling \$1.0 million that fund school districts where the majority of the students are LMI.

## SERVICE TEST

The bank's Service Test rating in the Kansas City assessment area is Low Satisfactory. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Kansas City assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides an adequate level of community development services in the assessment area.

### Accessibility of Delivery Systems

The bank operates 49 branches in the Kansas City assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

| Branch Distribution by Geography Income Level |                        |             |             |            |           |                          |
|---|------------------------|-------------|-------------|------------|-----------|--------------------------|
| Dataset                                       | Geography Income Level |             |             |            |           | TOTAL                    |
|   | Low-                   | Moderate-   | Middle-     | Upper-     | Unknown-  |                          |
| Branches                                      | 0<br>0.0%              | 15<br>30.6% | 25<br>51.0% | 9<br>18.4% | 0<br>0.0% | <b>49</b><br><b>100%</b> |
| Census Tracts                                 | 15.4%                  | 22.7%       | 32.3%       | 26.0%      | 3.7%      | <b>100%</b>              |
| Household Population                          | 9.4%                   | 22.7%       | 38.4%       | 29.2%      | 0.3%      | <b>100%</b>              |

As shown in the previous table, the bank maintains 15 branches (30.6 percent) in moderate-income geographies, which is above demographic data used for comparison. Conversely, the bank does not have any branches located in low-income geographies. In addition to the branches included in the table above, the bank also operates a commercial LPO in an upper-income census tract, and through a partnership with a local affordable housing organization, the bank maintains a mortgage LPO in a low-income census tract. Overall, the bank's distribution of branches is in line with the distribution of assessment area census tracts and household population; therefore, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels, particularly to those that are LMI.

### **Changes in Branch Locations**

The bank added this assessment area and all branches therein as part of the merger with its affiliate banks during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. In the Kansas City assessment area, an affiliate bank closed a branch in a moderate-, middle-, and upper-income census tract for a total of three closures. No branch openings were completed by the bank or its affiliates in this assessment area during the review period. Therefore, the bank's record of opening and closing branches in the assessment area has generally not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the Kansas City assessment area. All branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday, or similar, plus Saturday morning lobby access; in addition, all branches have drive-up accessibility and loan officers on site. Lastly, ten branches have ITM access with extended hours Monday through Saturday. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provides an adequate level of community development services in the assessment area. For this review period, the majority of 2019 community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. During the applicable review period, a total of 16 employees provided 1,214 hours of community development services to 25 different organizations benefitting the bank's assessment areas. Despite challenges posed by the pandemic, bank employees provided services to organizations promoting local economic development as well as affordable housing and education services for LMI families and individuals.

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Impactful services are described below the following table:

| <b>Community Development Services</b> |                           |                           |                                      |                             |              |
|---------------------------------------|---------------------------|---------------------------|--------------------------------------|-----------------------------|--------------|
|                                       | <b>Affordable Housing</b> | <b>Community Services</b> | <b>Revitalization/ Stabilization</b> | <b>Economic Development</b> | <b>TOTAL</b> |
| Service Hours                         | 400                       | 449                       | 0                                    | 365                         | 1,214        |
| Organizations Benefitted              | 5                         | 7                         | 0                                    | 13                          | 25           |

- Bank employees provided 388 service hours to four organizations that provide housing and supportive services to individuals and families in unstable housing or homeless situations.
- During the review period, 11 employees lent financial expertise to 12 organizations that provide small business counseling and area workforce development.

## ST. LOUIS, MISSOURI-ILLINOIS MULTISTATE METROPOLITAN STATISTICAL AREA<sup>3</sup>

### CRA RATING FOR ST. LOUIS:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

Satisfactory

**High Satisfactory**

**High Satisfactory**

**High Satisfactory**

Major factors supporting the institution's St. Louis rating include the following.

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment area.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects adequate dispersion throughout the assessment area.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment area.
- The bank makes a significant level of qualified community development investments and grants.
- Delivery systems are unreasonably inaccessible to portions of its assessment area and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of community development services.

<sup>3</sup> This rating reflects performance within the multistate MSA. The Missouri and Illinois statewide evaluations are adjusted and do not reflect performance in the multistate MSA.

**SCOPE OF EXAMINATION**

Scoping considerations applicable to the review of the St. Louis assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, as the bank's small farm loan activity is minimal in this assessment area, this lending category did not play a material role in the evaluation of St. Louis MSA lending performance. Consequently, small farm lending activity is not included in the borrower and geographic discussions. Based on loan demand and the bank's lending activity, HMDA lending received the greatest weight in the analysis, followed by small business lending.

The St. Louis assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contacts were used to ascertain specific community credit needs and provide context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the section that follows.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. LOUIS ASSESSMENT AREA****Bank Structure**

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates 16 of its offices in the St. Louis assessment area, representing 10.4 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Number of Delivery Systems by Census Tract Classification |            |                 |               |              |         |
|---|------------|-----------------|---------------|--------------|---------|
|   | Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown |
| Offices   | 0          | 2               | 3             | 11           | 0       |

In addition to branches, the bank operates one LPO and two standalone ATMs. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to its entire assessment area.

**General Demographics**

The assessment area is composed of the independent city of St. Louis and four of the 15 counties that make up the St. Louis MSA, including the Missouri counties of St. Louis and St. Charles, and the Illinois counties of Monroe and St. Clair. The assessment area's population is shown in the following table:

| County                                  | Population       |
|---|------------------|
| St. Louis City, Missouri                | 317,850          |
| St. Louis County, Missouri              | 1,001,327        |
| St. Charles, Missouri                   | 374,805          |
| Monroe, Illinois                        | 33,539           |
| St. Clair, Illinois                     | 267,029          |
| <b>TOTAL ASSESSMENT AREA POPULATION</b> | <b>1,994,550</b> |

Along with the population figures shown in the preceding table, the assessment area has 94,076 businesses, 84,211 of which are small businesses (89.5 percent). The majority of the assessment area's population is concentrated in Missouri, particularly in St. Louis County. The assessment area hosts strong manufacturing and commercial industries and is anchored by several large national corporations with headquarters in the area. The assessment area is also home to numerous universities and colleges, most notably Washington University and St. Louis University, in the city of St. Louis.

The bank's assessment area is a highly competitive banking market with 76 FDIC-insured financial institutions in the area operating 583 offices. According to the FDIC's Deposit Market Share Report of June 30, 2021, The Central Trust Bank is ranked 12<sup>th</sup> among these financial institutions, holding 22.2 percent of the assessment area's deposit market share.

The assessment area covers a wide metropolitan area with a diverse population and demographic composition. As such, credit needs in the area are numerous and varied. Particular credit needs noted by community contacts include microloan funds for small businesses, homeownership counseling and down payment assistance for consumers, and affordable home purchase and home improvement loans. In addition, the St. Louis assessment area has high community development needs mixed with a large network of community development organizations. As such, there are significant opportunities for financial institution involvement in community development activities.

### **Income and Wealth Demographics**

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

| <b>Assessment Area Demographics by Geography Income Level</b> |             |                  |                |               |                 |                |
|---|-------------|------------------|----------------|---------------|-----------------|----------------|
| <b>Dataset</b>  | <b>Low-</b> | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>Unknown-</b> | <b>TOTAL</b>   |
| Census  | 74          | 87               | 131            | 154           | 4               | <b>450</b>     |
| Tracts  | 16.4%       | 19.3%            | 29.1%          | 34.2%         | 0.9%            | <b>100%</b>    |
| Family  | 48,145      | 84,673           | 161,582        | 208,298       | 1439            | <b>504,137</b> |
| Population  | 9.6%        | 16.8%            | 32.1%          | 41.3%         | 0.3%            | <b>100%</b>    |

As shown in the preceding table, 35.7 percent of the assessment area geographies are LMI, but only 26.4 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the city of St. Louis in Missouri and the city of East St. Louis in Illinois, which is located in St. Clair County. Community contacts indicated North St. Louis, North County, and East St. Louis combined have the highest concentrated poverty rate in the respective state and rank among the poorest in the country. In addition, St. Clair County, Illinois, faces poverty challenges in its large rural areas due to lack of economic opportunities. In the county's urban core, poverty and disinvestment are pervasive and persistent, mirroring challenges faced by low-income communities in the Missouri side of St. Louis.

According to 2015 ACS data, the median family income for the assessment area was \$73,474. In comparison, the median family income for the state of Illinois (\$71,546) and the state of Missouri (\$60,809) were below the assessment area. These levels represent declines over 2010 data.

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The following table displays the distribution of assessment area families by income level compared to all Illinois and Missouri families.

| Family Population by Income Level |         |           |         |           |                  |
|-----------------------------------|---------|-----------|---------|-----------|------------------|
| Dataset                           | Low-    | Moderate- | Middle- | Upper-    | TOTAL            |
| St. Louis                         | 108,683 | 81,855    | 95,605  | 217,994   | <b>504,137</b>   |
|                                   | 21.6%   | 16.2%     | 19.0%   | 43.2%     | <b>100%</b>      |
| Illinois                          | 706,235 | 526,032   | 608,217 | 1,284,199 | <b>3,124,683</b> |
|                                   | 22.6%   | 16.8%     | 19.5%   | 41.1%     | <b>100%</b>      |
| Missouri                          | 327,271 | 274,380   | 319,267 | 609,088   | <b>1,530,006</b> |
|                                   | 21.4%   | 17.9%     | 20.9%   | 39.8%     | <b>100%</b>      |

The data in the table above shows that the percentage of families who are LMI in the assessment area (37.8 percent) is less than that of the families living in the states of Illinois and Missouri (39.4 percent and 39.3 percent, respectively). Furthermore, the percentage of families living below the poverty level in the assessment area (9.9 percent) is slightly below the percentages in Illinois and Missouri (10.5 percent and 11.1 percent, respectively). This data indicates that the assessment area is slightly more affluent than the states of Illinois and Missouri. However, the level of affluence varies significantly among the assessment area's four counties and independent city when considering percentages of LMI families and those living below the poverty line. For example, the city of St. Louis and St. Clair County have the highest levels of LMI families (58.2 percent and 44.2 percent, respectively) and families living below the poverty level (21.7 percent and 14.7 percent, respectively).

### Housing Demographics

The following table displays key housing demographics for the assessment area and the states of Illinois and Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

| Housing Demographics |                      |                     |                             |  |
|----------------------|----------------------|---------------------|-----------------------------|--|
| Dataset              | Median Housing Value | Affordability Ratio | Median Gross Rent (Monthly) | Housing Cost Burden (Renters   Owners) |
| St. Louis            | \$165,901            | 33.8%               | \$836                       | 43.5%   19.3%                          |
| Illinois             | \$173,800            | 33.1%               | \$907                       | 43.8%   23.4%                          |
| Missouri             | \$138,400            | 34.8%               | \$746                       | 40.6%   18.0%                          |

Based on affordability ratios and housing cost burden figures, housing is less affordable in the assessment area compared to the state of Missouri. These same ratios suggest that housing in the assessment area is less burdensome for homeowners and similarly affordable for both owners and renters compared to the state of Illinois. As with income levels, housing affordability varies by county and city. Affordability ratios suggest that when considering income levels, St. Clair County and St. Charles County (41.4 percent and 38.5 percent, respectively) offer the most affordable housing in the assessment area, while the city of St. Louis and St. Louis County (29.6 percent and 34.5 percent, respectively) are less affordable. However, community contacts indicated that St. Clair County, namely East St. Louis, is an area where LMI families find it especially challenging



to own a home. Though home prices are low, contacts explained that it is still unaffordable for LMI residents due to lack of income and credit. In addition, a portion of the housing stock in this area is old, vacant, or in disrepair, requiring significant investment in home improvement. Therefore, the strongest housing demand is for affordable housing, home improvement loans and grants, and affordable rental units.

### **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 89.5 percent of businesses in the assessment area have revenues under \$1 million. Community contacts note that small businesses are concentrated on the Missouri side of the St. Louis assessment area where there is a growing entrepreneurship ecosystem with biotech and agrotechnology leading the way. Small businesses are primarily concentrated in the city and county of St. Louis, and expanding to St. Charles County. County business patterns indicate that there are 1,024,805 paid employees in the assessment area. By percentage of employees, the largest job category in the assessment area is healthcare and social assistance (17.5 percent), followed by government (10.0 percent) and retail trade (9.9 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

| <b>Unemployment Data</b> |                            |                            |                            |
|--------------------------|----------------------------|----------------------------|----------------------------|
| <b>Dataset</b>           | <b>2019 Annual Average</b> | <b>2020 Annual Average</b> | <b>2021 Annual Average</b> |
| St. Louis                | 3.2%                       | 6.7%                       | 4.7%                       |
| Illinois                 | 4.0%                       | 9.5%                       | 6.1%                       |
| Missouri                 | 3.3%                       | 6.1%                       | 4.4%                       |

As shown in the preceding table, unemployment levels in the assessment area were significantly lower than the state of Illinois and similar to those of the state of Missouri during the review period. Again, the levels varied by county with St. Clair and St. Louis City having the highest levels and St. Charles and Monroe counties having the lowest levels both years. Across all counties, unemployment levels significantly increased in 2020 in line with the national unemployment trend resulting from the impact of the pandemic. The largest increase was in St. Clair County and St. Louis City, where small businesses concentrated in that county were forced to lay off employees or close. As shown in the table, unemployment levels in 2021 declined, trending down toward their pre-pandemic levels.

### **Community Contact Information**

For this assessment area, two community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. One contact represented an organization that promotes community development in the assessment area, and the other was from an economic and workforce development organization.

According to community contacts, St. Louis is one of the three largest economic engines in the state of Missouri. There are several multinational companies, large regional corporations, and elite universities in the area who serve as the largest employers. However, the wealth and opportunity are not evenly spread throughout the area. Contacts indicated North St. Louis City, North County, and East St. Louis combined have the highest concentrated poverty rate in the state and among the highest in the country. They also noted that the large, rural portions of St. Clair County, Illinois, also faces poverty challenges due to lack of economic opportunities. Regarding COVID-19, contacts explained that the impact further deteriorated the economic fabric of these areas.

Regarding small businesses, contacts identified the Missouri side of the assessment area as the center of the area's market, with most small businesses concentrated in St. Louis City, St. Louis County, and eastern portions of St. Charles County. They indicated many of the start-ups need loans for operating capital and inventory, making lower-rate, small dollar small business loans a top need in the area. Along with providing more flexible products, banks also have the opportunity to build stronger relationships with local small business owners, namely those located in the underserved areas of St. Louis, as many of them are unbanked. According to contacts, banks focus solely on providing financial literacy to meet CRA obligations but need to take a more holistic approach to outreach programs and credit access to better align resources and partnerships. Furthering the point, they indicated credit eligibility and a lack of trust in traditional banks are the two main reasons most LMI individuals choose nonbank financial providers.

Regarding affordable housing, contacts identified challenges that LMI residents face to obtaining affordable housing. On the Illinois side of the assessment area, contacts explain that although prices are low, they are still unaffordable for the residents in LMI census tracts area due to lack of income and credit. This situation yields a high demand for affordable rental units, which carries its own challenges. Many rental properties in LMI areas are aging, and poorly maintained, while the housing stock is newer and better maintained in middle- and upper- income areas. On the Missouri side of the assessment area, contacts described how housing trends have impacted the affordable housing options in the city of St. Louis. The city of St. Louis has lost a significant amount of population as more people are moving to St. Louis County through the Department of Housing and Urban Development (HUD) Section 8 Voucher Programs. The main reason for outward migration is the availability of higher-quality affordable housing. A priority for these areas is more affordable housing options, small dollar mortgage loans, home improvement loans, and innovative programs through which individuals may improve their credit scores.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS ASSESSMENT AREA****LENDING TEST**

The bank's Lending Test rating in the St. Louis assessment area is High Satisfactory. Lending levels reflect excellent responsiveness to the credit needs of the St. Louis assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects adequate penetration throughout the assessment area. The bank makes a relatively high level of community development loans in this assessment area. Lastly, the bank makes extensive use of flexible and/or innovative lending practices in meeting the credit needs of the St. Louis assessment area.

**Lending Activity**

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

| <b>Summary of Lending Activity</b>               |              |               |                  |               |
|--|--------------|---------------|------------------|---------------|
| <b>January 1, 2019 through December 31, 2020</b> |              |               |                  |               |
| <b>Loan Type</b>                                 | <b>#</b>     | <b>%</b>      | <b>\$ (000s)</b> | <b>%</b>      |
| Home Improvement                                 | 11           | 0.2%          | 1,267            | 0.1%          |
| Home Purchase                                    | 1,389        | 26.5%         | 354,953          | 31.3%         |
| Multifamily Housing                              | 20           | 0.4%          | 10,110           | 0.9%          |
| Refinancing                                      | 1,704        | 32.5%         | 437,839          | 38.7%         |
| Other  | 17           | 0.3%          | 2,412            | 0.2%          |
| <b>TOTAL HMDA</b>                                | <b>3,141</b> | <b>59.8%</b>  | <b>806,581</b>   | <b>71.2%</b>  |
| <b>Small Business</b>                            | <b>2,089</b> | <b>39.8%</b>  | <b>322,237</b>   | <b>28.5%</b>  |
| <b>Small Farm</b>                                | <b>20</b>    | <b>0.4%</b>   | <b>3,506</b>     | <b>0.3%</b>   |
| <b>TOTAL LOANS</b>                               | <b>5,250</b> | <b>100.0%</b> | <b>1,132,324</b> | <b>100.0%</b> |

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 15.3 percent by number and 13.2 percent by dollar were made in the St. Louis assessment area in 2019 and 13.4 percent by number and 18.5 percent by dollar in 2020. These percentages are higher than the percentage of total bank deposits held in the assessment area (11.8 percent by dollar) and the percentage of total bank branches located in the St. Louis assessment area (10.4 percent). Additionally, the bank's lending levels were compared to those of the other lenders in the assessment area. The bank ranked 27th in originations out of 585 HMDA aggregate lenders and 16<sup>th</sup> out of 154 CRA aggregate lenders. Finally, community contacts noted that both of these loan types are needed in the area, further demonstrating excellent responsiveness to assessment area credit needs.

### **Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the St. Louis assessment area is considered good overall based on the performance of each of the two loan products reviewed. When determining overall conclusions, HMDA loans are given the most weight, followed by small business loans.

#### *HMDA Lending*

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. In 2019, the percentage of loans to low-income borrowers (8.6 percent) was above the percentage of aggregate HMDA loans (7.6 percent) and below the percentage of families in the assessment area that are low income (21.6 percent), reflecting good performance. This is especially significant given the challenges low-income individuals have in achieving homeownership as described by community contacts. The distribution of loans to moderate-income borrowers (14.7 percent) was slightly under the aggregate (16.8 percent) and demographic (16.2 percent) figures, which is considered adequate. Given the high percentage of low-income families in the assessment area, more weight is given to the bank's performance relative to borrowers with that income level; therefore, overall distribution in 2019 is good.

In 2020, the bank's distribution of loans to low-income borrowers (3.6 percent) fell slightly under the aggregate level (5.8 percent) and remained below the demographic figure (21.6 percent), demonstrating adequate performance. The distribution of loans to moderate-income borrowers (15.3 percent) increased to a level in line with the aggregate performance (15.5 percent) and remained under the demographic figure (16.2 percent). This performance is especially impactful at the product level, which shows that the distribution of home purchase loans (22.2 percent) was above both the aggregate (21.7 percent) and demographic (16.2 percent), reflecting good performance. As a larger percentage of families are low income versus moderate income, more weight is given to performance with respect to low-income borrowers. Therefore, overall distribution in 2020 is considered adequate.

Due to the unique circumstance surrounding COVID-19 and the housing boom in 2020, more weight is given to performance in 2019, as it is considered more reflective of the bank's typical performance. Therefore, overall distribution for the review period is considered good.

#### *Small Business Lending*

The bank's small business lending reflects good distribution to businesses of different sizes overall. In 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less (49.0 percent) exceeded that of peer institutions (47.2 percent) but was significantly below the estimated percentage of businesses with this revenue profile (89.2 percent) in this assessment area, reflecting good performance.

In 2020, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less (21.2 percent) was below both the aggregate (40.1 percent) and demographic

(89.5 percent) figures. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 83.5 percent of total PPP loans had loan sizes of \$100,00 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, as community contacts noted the need for small dollar, small business loans.. Therefore, distribution of loans to businesses of different revenue sizes is adequate in 2020.

Given the impact of PPP lending in 2020, more weight is given to the bank's performance in 2019; therefore, overall performance for the review period is considered good.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans in the St. Louis assessment area is considered adequate overall based on the performance of each of the two loan products reviewed. When determining overall conclusions, HMDA loans are given the most weight, followed by small business loans.

#### *HMDA Lending*

The geographic distribution of HMDA loans during the review period is considered adequate in both years. In 2019 and 2020, the percentage of the HMDA loans that the bank originated in low-income census tracts (1.7 percent and 0.8 percent, respectively) was marginally lower than the aggregate level (2.0 percent and 1.5 percent, respectively) and lower than the percentage of families living in low-income census tracts (6.4 percent in both years). Considering that a low percentage of housing in low-income areas is owner occupied (29.4 percent), the bank's lending level reflects adequate performance. In moderate-income census tracts, the bank's distribution of HMDA loans in 2019 (11.2 percent) was above the aggregate (10.5 percent) and below the demographic (15.4 percent), which is considered good. In 2020, distribution in moderate-income census tracts (6.5 percent) fell slightly below the aggregate level (8.5 percent) and remained under the demographic figure (15.4 percent), reflecting adequate performance. With adequate performance in LMI census tracts over 2019 and 2020, the bank's HMDA lending performance is adequate overall.

#### *Small Business Lending*

The distribution of small business loans by geography income level is good overall. In 2019, the bank's level of small business lending in LMI census tracts (10.1 percent and 17.2 percent, respectively) was higher than the aggregate level (6.1 percent and 15.8 percent, respectively), as well as the percentage of small businesses located in low-income census tracts (6.9 percent and 16.5 percent, respectively), reflecting excellent performance. In 2020, the bank's percentage of loans originated in LMI census tracts (5.8 percent and 12.4 percent, respectively) was slightly under the aggregate (6.2 percent and 15.5 percent, respectively) and the demographic (7.1 percent

and 16.7 percent, respectively), reflecting adequate performance. Considering performance in both years, overall distribution is good.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. The bank made loans in 46.4 percent of assessment area census tracts in 2019 and 64.9 percent in 2020. Concentrations of census tracts with no lending are located in the northern portion of the city of St. Louis in Missouri and the western portions of St. Clair and Madison Counties in Illinois. These census tracts are mostly LMI where community contacts noted significant lending challenges exist. In addition, aggregate HMDA and CRA small business lending data also indicate that lending in these areas is difficult. In 2019, only 2.0 percent of aggregate HMDA loans and 5.4 percent of aggregate CRA small business loans in the St. Louis assessment area were made in those areas. Aggregate penetration in these areas was similar in 2020. While it is clear that lending in these areas is difficult, there is opportunity for the bank to increase its level of lending; thus, overall geographic distribution of loans is considered adequate.

### **Community Development Lending Activities**

The Central Trust Bank makes a relatively high level of community development loans in the St. Louis assessment area. During the review period, the bank originated or renewed 43 community development loans for \$29.3 million, including five PPP loans totaling \$2.2 million. This level is within range of peer banks in the assessment area. Noteworthy loans are discussed following the table below.

| <b>Community Development Lending</b> |                           |                  |                           |                  |                                      |                  |                             |                  |              |                  |
|--------------------------------------|---------------------------|------------------|---------------------------|------------------|--------------------------------------|------------------|-----------------------------|------------------|--------------|------------------|
|                                      | <b>Affordable Housing</b> |                  | <b>Community Services</b> |                  | <b>Revitalization/ Stabilization</b> |                  | <b>Economic Development</b> |                  | <b>TOTAL</b> |                  |
|                                      | <b>#</b>                  | <b>\$ (000s)</b> | <b>#</b>                  | <b>\$ (000s)</b> | <b>#</b>                             | <b>\$ (000s)</b> | <b>#</b>                    | <b>\$ (000s)</b> | <b>#</b>     | <b>\$ (000s)</b> |
| Community Development Loans          | 27                        | 14,163           | 6                         | 3,800            | 4                                    | 9,112            | 1                           | 50               | 38           | 27,125           |
| PPP Loans                            | 1                         | 185              | 3                         | 629              | 1                                    | 1,383            | -                           | -                | 5            | 2,196            |
| <b>TOTAL</b>                         | <b>28</b>                 | <b>14,348</b>    | <b>9</b>                  | <b>4,429</b>     | <b>5</b>                             | <b>10,495</b>    | <b>1</b>                    | <b>50</b>        | <b>43</b>    | <b>29,321</b>    |

- Thirteen originations for \$10.0 million for affordable rental properties located in LMI census tracts in the city of St. Louis and St. Clair County where community contacts identified the need for affordable rental housing.
- Four non-PPP loans totaling \$9.1 million that fund revitalization and stabilization efforts in moderate-income census tracts in the city of St. Louis that are also designated as empowerment zones.
- Five PPP loans totaling \$2.2 million qualified as community development and helped sustain businesses and nonprofits during the pandemic.
- Participation in a microloan program, funding small businesses in the city of St. Louis and St. Louis County impacted by COVID-19, totaling \$50 thousand.

**Product Innovation**

The bank makes extensive use of flexible lending practices in serving the credit needs of the St. Louis assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance Tests* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in St. Louis is described below:

- Through the SBA's PPP, the bank originated 1,517 PPP loans totaling \$207.5 million in its St. Louis assessment area and nearby geographies. According to metrics provided by the SBA, the bank ranked 11<sup>th</sup> in 2020 and 25<sup>th</sup> in 2021 in number of originations among all lenders participating in the program. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those in St. Louis.
- Specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas, the bank's Home Turf Program allows eligible borrowers to make a reduced minimum down payment using flexible sources of payment. From January 1, 2019, to December 31, 2021, the bank originated 393 mortgage loans, totaling \$54.1 million in St. Louis.
- Through the Missouri Housing Development Commission Loan Program, which helps LMI families with closing cost and down payment assistance, the bank originated 28 loans totaling \$3.2 million in St. Louis.
- The bank originated a significant volume of mortgage loans through the Fannie Mae HomeReady Loan Program and the Freddie Mac HomePossible Loan Program. Each program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans. From 2019 through 2021, the bank originated 131 HomeReady loans, totaling \$21.4 million, and 36 HomePossible loans, totaling \$5.8 million in St. Louis.
- From 2019 through 2021, the bank originated a total of five loans totaling \$1.5 million through the SBA-CDC/504 Loan Program and the SBA 7(a) Loan Program. Through these programs, the bank offered small business loans that support small business operations and/or expansion.
- The bank also originated a significant volume of mortgage loans through government loan programs, including 186 FHA loans, totaling \$32.1 million, two RD home loans, totaling \$598,856, and 137 VA loans, totaling \$43.5 million.

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## INVESTMENT TEST

The bank's Investment Test rating in the St. Louis assessment area is High Satisfactory. The Central Trust Bank makes a significant level of qualified community development investments and grants in the St. Louis assessment area. During the review period, the bank had 39 investments and 50 donations totaling \$9.1 million. Of that total, \$3.4 million were current-period investments, \$5.5 million were prior-period investments still outstanding, and \$217,550 were donations to various community development organizations. Overall investments and donations were within range of peer banks in the area. Noteworthy investments are discussed following the table below.

| Community Development Investments |                    |              |                    |              |                                  |           |                         |           |           |              |
|-----------------------------------|--------------------|--------------|--------------------|--------------|----------------------------------|-----------|-------------------------|-----------|-----------|--------------|
|                                   | Affordable Housing |              | Community Services |              | Revitalization/<br>Stabilization |           | Economic<br>Development |           | TOTAL     |              |
|                                   | #                  | \$ (000s)    | #                  | \$ (000s)    | #                                | \$ (000s) | #                       | \$ (000s) | #         | \$ (000s)    |
| Investments                       | 32                 | 6,510        | 7                  | 2,325        | -                                | -         | -                       | -         | 39        | 8,835        |
| Donations                         | 10                 | 26           | 40                 | 192          | -                                | -         | -                       | -         | 50        | 218          |
| <b>TOTAL</b>                      | <b>42</b>          | <b>6,536</b> | <b>47</b>          | <b>2,517</b> | <b>-</b>                         | <b>-</b>  | <b>-</b>                | <b>-</b>  | <b>89</b> | <b>9,053</b> |

- Two MBS investments totaling \$1.3 million for affordable, multi- and single-family housing.
- Seven municipal bonds totaling \$2.3 million that fund a school district where majority of the students are LMI.

## SERVICE TEST

The bank's Service Test rating in the St. Louis assessment area is High Satisfactory. Service delivery systems are unreasonably inaccessible to portions of the St. Louis assessment area. However, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the area, particularly LMI geographies and LMI individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

### Accessibility of Delivery Systems

The bank operates 16 branches in the St. Louis assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.



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| <b>Branch Distribution by Geography Income Level</b> |                               |                  |                |               |                 |                          |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------------------|
| <b>Dataset</b>                                       | <b>Geography Income Level</b> |                  |                |               |                 | <b>TOTAL</b>             |
|  | <b>Low-</b>                   | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>Unknown-</b> |                          |
| Branches   | 0<br>0.0%                     | 2<br>12.5%       | 3<br>18.8%     | 11<br>68.8%   | 0<br>0.0%       | <b>16</b><br><b>100%</b> |
| Census Tracts  | 16.4%                         | 19.3%            | 29.1%          | 34.2%         | 0.9%            | <b>100%</b>              |
| Household Population                                 | 10.8%                         | 18.5%            | 33.3%          | 37.1%         | 0.3%            | <b>100%</b>              |

The bank's distribution of branches in LMI areas is well below demographic data used for comparison, and none of the bank's 16 branches are located in a low-income geography. Conversely, the substantial majority of bank branches are in upper-income census tracts, as are the bank's only LPO and two stand-alone ATMs in this assessment area. Therefore, the bank's service delivery systems are unreasonably inaccessible to portions of this assessment area.

### **Changes in Branch Locations**

The bank added this assessment area and all branches therein as part of a merger with its affiliate banks during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. In the St. Louis assessment area, an affiliate bank opened one new, limited-service branch in an upper-income geography prior to the merger. No branch closures were completed by the bank or its affiliates in this assessment area during the review period. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the St. Louis assessment area with the exception of a limited-service branch in an upper-income census tract that only provides access to residents of a senior living community. Branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday, or similar. Fourteen branches have open lobby hours on Saturday mornings, 15 branches have drive-up access, and 10 branches have loan officers on site, all of which include the two branches in moderate-income census tracts. In addition, three branches have ITM access with extended hours Monday through Saturday. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

**Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. In total, 75 employees provided 3,165 hours of community development services to 28 different organizations benefitting the assessment area. Despite challenges posed by the pandemic, bank employees provided services to organizations promoting local economic development as well as affordable housing and education services for LMI families, children, and individuals with intellectual and developmental disabilities. Impactful services are described below the following table:

| <b>Community Development Services</b> |                           |                           |                                      |                             |              |
|---------------------------------------|---------------------------|---------------------------|--------------------------------------|-----------------------------|--------------|
|                                       | <b>Affordable Housing</b> | <b>Community Services</b> | <b>Revitalization/ Stabilization</b> | <b>Economic Development</b> | <b>TOTAL</b> |
| Service Hours                         | 308                       | 2,719                     | 0                                    | 139                         | 3,165        |
| Organizations Benefitted              | 7                         | 19                        | 0                                    | 2                           | 28           |

- Sixty-one employees lent their financial expertise by delivering 313 hours of financial education sessions to children in LMI school districts.
- Two bank officers provided 1,037 hours of service providing income tax preparation and support services to LMI individuals.
- Thirteen employees dedicated 1,449 hours serving as board members of 18 organizations that provide affordable housing, community services, and economic development services to the assessment area.

## OKLAHOMA

### CRA RATING FOR OKLAHOMA:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**Satisfactory**

**Low Satisfactory**

**Low Satisfactory**

**Low Satisfactory**

Major factors supporting the institution's Oklahoma rating include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.
- The distribution of borrowers' income/revenue profile reflects adequate penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment areas.
- The bank makes an adequate level of community development loans.
- The bank makes limited use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services.

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Oklahoma assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the Oklahoma assessment areas due to lack of volume.

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Small business lending carried the most weight in this evaluation as it was the strategic focus for the bank and comprised the majority of the bank's loan portfolio.

Through the merger with its affiliate banks on October 1, 2021, The Central Trust Bank added two assessment areas in Oklahoma and all of the branches therein. When developing ratings, consideration was given to the bank's historical affiliation with the acquired banks and its associated operations. The two assessment areas are located in MSAs, one of which was reviewed under full-scope procedures.

To augment the evaluation of the full-scope review assessment area, one community contact interview was leveraged. The interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from this interview is included in the *Description of Institution's Operations* sections, as applicable to the assessment area in which the community contact was made.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA

The Central Trust Bank operates nine offices (5.8 percent of total branches) in its two CRA assessment areas in Oklahoma. The following table gives additional detail regarding the bank's operations in the state.

| Assessment Area | Offices  |               | Deposits<br>As of June 30, 2021 |               | Review Procedures     |
|-----------------|----------|---------------|---------------------------------|---------------|-----------------------|
|                 | #        | %             | \$                              | %             |                       |
| Tulsa           | 6        | 66.7%         | \$567,153                       | 95.2%         | Full Scope            |
| Oklahoma City   | 3        | 33.3%         | \$28,442                        | 4.8%          | Limited Scope         |
| <b>TOTAL</b>    | <b>9</b> | <b>100.0%</b> | <b>\$595,595</b>                | <b>100.0%</b> | <b>1 – Full Scope</b> |

As shown above, the bank's deposits in Oklahoma total \$595.6 million, which represent 3.9 percent of total bank deposits. The bank's operations in the state are heavily concentrated in the Tulsa MSA, which drove the statewide rating as the lone full-scope review.

Through the merger with its affiliates, The Central Trust Bank added eight branches and two assessment areas in Oklahoma. Prior to the merger, the bank's affiliates opened one branch in Oklahoma City, and post-merger, the bank opened an additional branch in the same assessment area. The information in the table above is discussed in more detail within each of the respective assessment area sections.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

The bank's Lending Test performance in Oklahoma is rated Low Satisfactory. The test considers the following criteria.

#### Lending Activity

| Full-Scope Review Areas | Lending Activity |
|-------------------------|------------------|
| Tulsa                   | Good             |

| Limited-Scope Review Areas | Lending Activity |
|----------------------------|------------------|
| Oklahoma City              | Consistent       |

The bank's overall level of lending reflects good responsiveness to the credit needs of the Oklahoma assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

#### Borrower and Geographic Distribution

As displayed in the following tables, the bank's performance by borrower's income and revenue profile is adequate in Oklahoma.

| Full-Scope Review Areas | Loan Distribution by Borrower's Profile |
|-------------------------|---|
| Tulsa                   | Adequate                                |

| Limited-Scope Review Areas | Loan Distribution by Borrower's Profile |
|----------------------------|---|
| Oklahoma City              | Exceeds                                 |

Overall, the bank's geographic distribution of loans reflects good penetration throughout Oklahoma.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|-------------------------|----------------------------------|
| Tulsa                   | Good                             |

| Limited-Scope Review Areas | Geographic Distribution of Loans |
|----------------------------|----------------------------------|
| Oklahoma City              | Consistent                       |

#### Community Development Lending Activities

Overall, the bank makes an adequate level of community development loans in its Oklahoma assessment areas, as displayed below.

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| Full-Scope Review Areas | Community Development Lending Activities |
|-------------------------|--|
| Tulsa                   | Adequate                                 |

| Limited-Scope Review Areas | Community Development Lending Activities |
|----------------------------|--|
| Oklahoma City              | Consistent                               |

During the review period, the bank made ten community development loans totaling \$26.8 million, one of which was a PPP loan with a community development purpose for \$8.2 million.

### **Product Innovation**

The bank makes limited use of flexible lending practices in serving the credit needs of the Oklahoma assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance Tests* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Oklahoma is described below:

- Through the SBA's PPP, the bank originated 488 PPP loans totaling \$50.9 million across the state. In 2020, the bank ranked 18<sup>th</sup> in Tulsa and 61<sup>st</sup> in Oklahoma City among all lenders that participated in the program. Its position fell in 2021; however, the bank remained above the 50<sup>th</sup> percentile in both assessment areas. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those located in the bank's Oklahoma assessment areas.
- From January 1, 2019, to December 31, 2021, the bank originated two HomeReady loans, totaling \$230,375 in its Oklahoma assessment areas. The HomeReady program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans.
- The bank originated one small dollar farm loan for \$1,560 through the USDA FSA program in its Tulsa assessment area. Loans through this program are tailored to the needs of farmers and ranchers, including those who own small farms.
- The bank also originated mortgage loans through government loan programs, including two FHA loans, totaling \$455,436, and six VA loans, totaling \$1,534,061.

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## INVESTMENT TEST

Overall, the bank's performance in Oklahoma is rated Low Satisfactory under the Investment Test. The following tables display investment and grant activity performance in Oklahoma.

| Full-Scope Review Areas | Investment and Grant Activity |
|-------------------------|-------------------------------|
| Tulsa                   | Adequate                      |

| Limited-Scope Review Areas | Investment and Grant Activity |
|----------------------------|-------------------------------|
| Oklahoma City              | Consistent                    |

As shown in the table below, the bank's total investment and grant activity included \$1.7 million in qualified investments and grants and \$83,380 in donations. These activities consisted primarily of investments in MBS supporting affordable housing in the Oklahoma assessment areas as well as one investment supporting economic development at a statewide level. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

| Oklahoma Assessment Area | Investments        | Donations/Grants |
|--------------------------|--------------------|------------------|
| Tulsa                    | \$566,560          | \$80,910         |
| Oklahoma City            | \$133,242          | \$2,470          |
| Statewide                | \$1,000,000        | -                |
| <b>TOTAL</b>             | <b>\$1,699,802</b> | <b>\$83,380</b>  |

## SERVICE TEST

The bank's performance in Oklahoma is rated Low Satisfactory under the Service Test. This test considers the following criteria:

### Accessibility of Delivery Systems

As displayed in the following tables, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in Oklahoma.

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|-------------------------|-----------------------------------|
| Tulsa                   | Reasonably Accessible             |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|----------------------------|-----------------------------------|
| Oklahoma City              | Consistent                        |

### Changes in Branch Locations

Through the merger with its affiliates, The Central Trust Bank added the two Oklahoma assessment areas and related branches. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. The bank's

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record of opening and closing branches in the Oklahoma assessment areas has not adversely affected accessibility to its service delivery systems.

| Full-Scope Review Areas | Changes in Branch Locations |
|-------------------------|-----------------------------|
| Tulsa                   | Not Adversely Affected      |

| Limited-Scope Review Areas | Changes in Branch Locations |
|----------------------------|-----------------------------|
| Oklahoma City              | Exceeds                     |

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs**

Business hours and banking services do not vary in a way that inconveniences certain portions of the Oklahoma assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|-------------------------|---|
| Tulsa                   | Do not vary in a way that inconveniences      |

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|----------------------------|---|
| Oklahoma City              | Exceeds                                       |

### **Community Development Services**

The bank provides an adequate level of community development services in the Oklahoma assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Oklahoma assessment areas.

| Full-Scope Review Areas | Community Development Services |
|-------------------------|--------------------------------|
| Tulsa                   | Adequate                       |

| Limited-Scope Review Areas | Community Development Services |
|----------------------------|--------------------------------|
| Oklahoma City              | Below                          |

During the review period, 30 bank employees provided 1,374 hours of community development service activities to seven organizations throughout the Oklahoma assessment areas. Despite challenges posed by the pandemic, bank employees lent their expertise in various capacities, such as board member and financial literacy instructor, to local community service and economic development organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.



# TULSA, OKLAHOMA METROPOLITAN STATISTICAL AREA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULSA ASSESSMENT AREA

### Bank Structure

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates six of its offices in the Tulsa assessment area, representing 3.9 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Number of Delivery Systems by Census Tract Classification |            |                 |               |              |
|---|------------|-----------------|---------------|--------------|
|   | Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| Offices   | 0          | 2               | 2             | 2            |

Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area. However, it may experience challenges serving the outermost portions of its assessment area, namely northwest Osage County, given the geographical distance from the bank's nearest branch.

### General Demographics

The bank's Tulsa assessment area includes the full counties of Tulsa, Rogers, Creek, and Osage, four of the seven counties that comprise the Tulsa – Broken Arrow – Owasso, Oklahoma MSA.

The assessment area's population as of the 2015 ACS and its land area are shown in the following table:

| County                       | Population     | Land Area          |
|------------------------------|----------------|--------------------|
| Tulsa County                 | 623,335        | 587 square miles   |
| Rogers County                | 89,190         | 711 square miles   |
| Creek County                 | 70,761         | 970 square miles   |
| Osage County                 | 48,054         | 2,304 square miles |
| <b>TOTAL ASSESSMENT AREA</b> | <b>831,340</b> |                    |

Tulsa County is the largest county by population in the assessment area and the second largest in the state. Its county seat, the city of Tulsa, is the economic hub of the Tulsa MSA and is home to prominent energy, aerospace, telecommunications, and manufacturing companies. It also hosts several community colleges and universities, including the University of Tulsa, which serves as a pipeline of industry talent, according to the community contact. In contrast, Osage County is the smallest county by population in the assessment area but the largest county by land. It is coextensive with the Osage Nation Reservation and consists of mostly open prairies as well as a large lake. Rogers and Creek Counties are similar in population and land area and are largely residential in nature.

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The Tulsa assessment area is the bank's primary operating market in Oklahoma and contains six of the bank's nine branches in the state. According to the FDIC Market Share Report as of June 30, 2021, the bank had 1.6 percent of the deposit market share in the Tulsa assessment area, ranking 15th out of 53 financial institutions within the assessment area. The bank operates with significant competition in this assessment area from large, nationally recognized financial institutions, regional banks, and local banks and credit unions.

The assessment area has 47,150 businesses, 42,864 of which are small businesses (90.9 percent). As a result, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. The community contact noted a substantive demand for small-dollar small business loans, especially in the more residential portions of the area where there is less access to small business credit and services.

### **Income and Wealth Demographics**

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

| <b>Assessment Area Demographics by Geography Income Level</b> |             |                  |                |               |                 |              |
|---|-------------|------------------|----------------|---------------|-----------------|--------------|
| <b>Dataset</b>  | <b>Low-</b> | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>Unknown-</b> | <b>TOTAL</b> |
| Census  | 17          | 67               | 88             | 63            | 0               | <b>235</b>   |
| Tracts  | 7.2%        | 28.5%            | 37.5%          | 26.8%         | 0.0%            | 100%         |
| Family  | 10,765      | 49,667           | 84,514         | 68,104        | 0               | 213,050      |
| Population  | 5.1%        | 23.3%            | 39.7%          | 32.0%         | 0.0%            | 100%         |

As shown above, 35.7 percent of census tracts in the assessment area are designated as LMI, and 28.4 percent of assessment area families reside within those tracts. Of the families living in LMI tracts, 23.8% are below the poverty line. All low-income census tracts are located in Tulsa County, primarily north and west of the city of Tulsa. Moderate-income census tracts are found in each county in the assessment area, most of which are also in Tulsa County.

According to 2015 ACS data, the median family income for the Tulsa assessment area was \$61,548, while the same figure for the state of Oklahoma as a whole was \$58,029. The following table displays the distribution of assessment area families by income level compared to all Oklahoma families.

| <b>Family Population by Income Level</b> |             |                  |                |               |              |
|--|-------------|------------------|----------------|---------------|--------------|
| <b>Dataset</b>                           | <b>Low-</b> | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>TOTAL</b> |
| Tulsa                                    | 45,660      | 37,178           | 42,911         | 87,301        | 213,050      |
|  | 21.4%       | 17.5%            | 20.1%          | 41.0%         | 100 %        |
| Oklahoma                                 | 208,222     | 170,327          | 195,424        | 392,036       | 966,009      |
|  | 21.6%       | 17.6%            | 20.2%          | 40.6%         | 100 %        |

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (38.9 percent) than reside in LMI geographies (35.7 percent). As displayed in the second table, the percentage of assessment area families that are LMI is similar to the figure for the state of Oklahoma as a whole (39.2 percent). Poverty levels in the assessment area (11.5 percent) are slightly lower than statewide levels (12.4 percent). Therefore, considering these statistics, the assessment area is slightly more affluent than the state of Oklahoma as a whole.

### **Housing Demographics**

The following table displays key housing demographics for the assessment area and state of Oklahoma. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

| <b>Housing Demographics</b> |                             |                            |                                    |   |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|---|
| <b>Dataset</b>              | <b>Median Housing Value</b> | <b>Affordability Ratio</b> | <b>Median Gross Rent (Monthly)</b> | <b>Housing Cost Burden (Renters   Owners)</b> |
| Tulsa                       | \$133,881                   | 37.4%                      | \$767                              | 39.7%   17.4%                                 |
| Oklahoma                    | \$117,900                   | 39.8%                      | \$727                              | 38.3%   16.7%                                 |

Housing in the assessment area is slightly less affordable than in the state of Oklahoma overall as evidenced by a lower affordability ratio. By county, housing in Tulsa County is least affordable (35.9 percent) and housing is most affordable in Osage County (45.4 percent). Rental costs in the assessment area are higher than in the state. The percentage of renters with rental costs exceeding 30.0 percent of their income in the assessment area (39.7 percent) is slightly above the statewide figure (38.3 percent). Of those renters, the highest percentage live in Tulsa County (40.7 percent), and the lowest percentage live in Creek County (32.9 percent). At an aggregate level, a community contact considers housing in Tulsa to be affordable, with more expensive homes located in the southern part of the MSA and more affordable housing in the northern and eastern parts of the area. The contact identified multifamily housing to be a need for the area.

### **Industry and Employment Demographics**

The assessment area economy is diversified and supports a large business community, including a strong small business sector. County business patterns data indicates that there are 397,283 paid employees in the assessment area. The three largest sectors of the assessment area economy by number of paid employees are healthcare and social assistance (14.3 percent), retail trade (11.6 percent), and government (11.5 percent). The assessment area also hosts a prominent professional and technical services sector, which accounts for only 5.2 percent of paid employees but 13.3 percent of business establishments.

The following chart displays annual unemployment rates (not seasonally adjusted) for each county in the Tulsa assessment area, the assessment area as a whole, and the state of Oklahoma.

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| <b>Unemployment Data</b>     |                            |                            |                            |
|------------------------------|----------------------------|----------------------------|----------------------------|
| <b>Dataset</b>               | <b>2019 Annual Average</b> | <b>2020 Annual Average</b> | <b>2021 Annual Average</b> |
| Tulsa County                 | 3.0%                       | 6.6%                       | 4.0%                       |
| Rogers County                | 2.9%                       | 5.8%                       | 3.5%                       |
| Creek County                 | 3.5%                       | 6.5%                       | 4.2%                       |
| Osage County                 | 3.6%                       | 6.4%                       | 4.2%                       |
| <b>Tulsa Assessment Area</b> | <b>3.0%</b>                | <b>6.5%</b>                | <b>4.0%</b>                |
| <b>Oklahoma</b>              | <b>3.1%</b>                | <b>6.1%</b>                | <b>3.8%</b>                |

As shown in the preceding table, the unemployment rates for Tulsa and Rogers Counties were comparable to the assessment area and state averages in 2019. Creek and Osage Counties generally had higher rates than the assessment area and state figures. These counties are more rural in nature and lack the level of manufacturing and industry that is most prevalent in the more densely populated assessment area counties. In 2020, unemployment levels significantly increased in line with the national unemployment trend resulting from the impact of the pandemic. Tulsa County experienced the greatest increase at 3.6 percent as the small businesses concentrated in that county were forced to lay off employees or close. As shown in the data, unemployment levels in 2021 trended back downward, nearing their 2019 annual averages by county and the state as a whole.

### **Community Contact Information**

For this assessment area, a community contact interview was used to ascertain specific credit needs, opportunities, and local market conditions. The contact was a representative from an economic development organization that promotes affordable housing and small business development. According to the contact, oil/gas, energy technology, aerospace/aviation, education, and healthcare are the primary industries, which outside of energy technology, have had a long history in Tulsa. Major employers have invested time and energy into the area economy, and the city and local industries also work closely with area tribal nations, including the Osage, Creek, and Cherokee Nations. The contact states that the area benefits from a diverse intersection of people as the region has a substantive Native American population, with a portion of the region's land area being deemed tribal land.

Regarding small businesses, the community contact explained that opportunities for small businesses vary by county. According to the individual, the northern part of Tulsa is primarily residentially zoned and thus prevents the building of industrial parks where businesses and employment may be found. Additionally, most small business development resources are in the core of the city, requiring many individuals to have transportation to access them. In East Tulsa, the community contact described a very entrepreneurial area with many new restaurants and businesses in the service industry. The contact suggested that the population is very eager to start businesses and often seeks out business support services to accommodate the demand. Across the assessment area, the contact sees the need for banks to offer or fund technical assistance programs that equip entrepreneurs with the skills to run a business, as well as microloans and SBA products. According to the contact, housing in the area is generally affordable with differences by region. For example, in southern Tulsa, housing is generally more expensive, whereas in northern and eastern Tulsa, more affordable housing may be found. The contact mentioned that several

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organizations offer homebuyer education, down payment assistance, and other things to make housing more accessible. The individual suggested banks fund or join coalitions aimed at building or redeveloping affordable housing in the region, namely workforce-centered multifamily properties for rent or purchase.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA ASSESSMENT AREA****LENDING TEST**

Lending levels reflect good responsiveness to the credit needs of the Tulsa assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Additionally, the bank made an adequate level of community development loans in this assessment area.

**Lending Activity**

The following table displays the combined 2019 and 2020 lending volume in this assessment area by number and dollar volume.

| <b>Summary of Lending Activity</b>               |              |              |                  |              |
|--|--------------|--------------|------------------|--------------|
| <b>January 1, 2019 through December 31, 2020</b> |              |              |                  |              |
| <b>Loan Type</b>                                 | <b>#</b>     | <b>%</b>     | <b>\$ (000s)</b> | <b>%</b>     |
| Home Improvement                                 | 4            | 0.4%         | 345              | 0.2%         |
| Home Purchase                                    | 73           | 7.2%         | 17,958           | 10.8%        |
| Multifamily Housing                              | 4            | 0.4%         | 5942             | 3.6%         |
| Refinancing                                      | 78           | 7.7%         | 16,425           | 9.9%         |
| <b>TOTAL HMDA</b>                                | <b>159</b>   | <b>15.7%</b> | <b>40,670</b>    | <b>24.4%</b> |
| <b>Small Business</b>                            | <b>845</b>   | <b>83.6%</b> | <b>56,328</b>    | <b>75.4%</b> |
| <b>Small Farm</b>                                | <b>7</b>     | <b>0.7%</b>  | <b>399</b>       | <b>0.2%</b>  |
| <b>TOTAL LOANS</b>                               | <b>1,011</b> | <b>100%</b>  | <b>166,632</b>   | <b>100%</b>  |

The bank's lending levels reflect good responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 3.9 percent by number and 6.6 percent by dollar were made in the Tulsa assessment area in 2019, which is closely aligned with the percentage of total bank deposits held (3.7 percent by dollar) and branches located (3.9 percent) in the assessment area. In addition, the bank's lending levels were compared to those of the other lenders in the assessment area. Only HMDA-reported data was available and shows that the bank ranked 67<sup>th</sup> out of 428 HMDA aggregate lenders in 2019. In 2020, the bank's percentage of HMDA and CRA loans made in the assessment area (2.2 percent by number and 2.4 percent by dollar) dropped slightly below the percentage of deposits held and branches located in the area. When comparing the bank's lending levels to that of other lenders, data shows that the bank remained 67<sup>th</sup> out of 444 HMDA aggregate lenders and ranked 57<sup>th</sup> out of 158 CRA aggregate lenders. The bank's small business lending in the assessment area is considered especially responsive as the community contact cites small business loans as a key need in the area as identified by the community contact. Given the bank's relatively small share of deposits held and branches located in the Tulsa assessment area, its level of lending is considered good.

### **Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the Tulsa assessment area is considered adequate overall based on the performance of both of the loan products reviewed. When determining overall conclusions, small business loans are given more weight than HMDA loans.

#### *HMDA Lending*

Overall, the bank's loan distribution of HMDA loans is poor for both years of data reviewed. In 2019, the bank made no HMDA loans to low-income borrowers compared to 21.4 percent of families with that income designation, and aggregate lenders made 6.6 percent of HMDA loans to low-income borrowers. HMDA volumes were low for the bank overall; therefore, distribution is considered poor. To moderate-income borrowers, the bank's percentage of loans (5.4 percent) was substantially below the aggregate level (17.3 percent) and the demographic figure (17.5 percent), also reflecting poor performance. A further review of the data showed that the majority of HMDA loans were made to borrowers with unknown income (57.1 percent), which significantly impacted the distribution analysis. This has been attributed to a high volume of nonowner-occupied investment properties, which are generally associated with rental properties. While these properties may meet housing needs, there are additional opportunities for the bank to enhance its responsiveness to LMI borrowers.

In 2020, the bank's distribution of HMDA loans to borrowers in low- and moderate-income census tracts (1.9 percent and 8.7 percent, respectively) were below the aggregate levels (4.1 percent and 14.8 percent, respectively) and the demographic figures (21.4 percent and 17.5 percent, respectively). The distribution of HMDA loans to borrowers with unknown revenues remained high (35.0 percent), thereby significantly impacting this analysis. However, lending in both low- and moderate-income census tracts remained poor, and overall distribution in 2020 is also considered poor.

#### *Small Business Lending*

Overall, the bank's loan distribution to businesses of different revenue sizes is good. In 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less (56.3 percent) exceeded that of peer institutions (45.3 percent) but landed below the estimated percentage of businesses with this revenue profile (90.7 percent), demonstrating good performance.

In 2020, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less (31.4 percent) fell slightly below the aggregate level (33.3 percent) and further below demographic figure (90.9 percent). Additional review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 49.4

percent of total PPP loans had loan sizes of \$100,00 or less. This analysis revealed an adequate responsiveness to credit needs.

Given the substantial impact of PPP lending on bank performance, 2019 data is given more weight; therefore, overall distribution for the review period is considered good.

### **Geographic Distribution of Loans**

Overall, the geographic distribution of loans in the assessment area is good based on the products reviewed, with small business lending receiving the most weight, followed by HMDA lending.

#### *HMDA Lending*

The geographic distribution of HMDA loans is good overall. The bank's performance lending in low-income census tracts in both 2019 and 2020 (1.8 percent and 1.9 percent, respectively) was above peer lending performance (0.9 percent and 0.8 percent, respectively) and below the demographic figure, which was 3.2 percent in both years, reflecting good performance in both years. In moderate-income areas, the bank's HMDA lending in 2019 (23.2 percent) exceeded that of the aggregate level (14.6 percent) and the demographic figure (19.4 percent), demonstrating excellent distribution. In 2020, the bank's lending level in moderate-income census tracts (11.7 percent) was in line with the aggregate level (11.8 percent) and under the demographic (19.4 percent), reflecting good distribution. Further consideration was given to the bank's performance in addressing credit needs noted by the community contact, who pointed to the need for affordable housing, particularly home purchase loans for 1–4 family units. In 2019, the bank originated 26.4 percent of its home purchase loans in LMI census tracts, exceeding that of the aggregate level (16.2 percent) and the demographic figure (22.6 percent), reinforcing the bank's excellent performance. In 2020, the bank's distribution of home purchase loans (12.8 percent) fell below both the aggregate level (14.9 percent) and the demographic figure (22.6 percent), demonstrating adequate responsiveness. Considering performance across both years, the bank's geographic distribution of HMDA loans is considered good.

#### *Small Business Lending*

The bank's small business lending reflects excellent distribution. In 2019, the bank's percentage of small business loans made in LMI census tracts (3.5 percent and 24.2 percent, respectively) was greater than that of the aggregate figures (2.7 percent and 20.1 percent, respectively) as well as the percentage of businesses located in these tracts (3.4 percent and 22.5 percent, respectively). This comparative performance was similar in 2020 where the bank's distribution in LMI census tracts (3.4 percent and 24.9 percent) was greater than the aggregate figures (2.6 percent and 20.9 percent) as well as the demographic figures (3.3 percent and 22.5 percent, respectively). Therefore, the bank's lending performance to small businesses in both low- and moderate-income geographies in both years is excellent.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. The bank made loans in 50.2 percent of assessment area census tracts in 2019 and



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63.8 percent in 2020. Concentrations of census tracts with no lending are located in the northern portion of Tulsa County where there are several LMI census tracts. A detailed review of the area and the bank's lending patterns showed that several factors contributed to this result. The community contact noted that this area is zoned as a residential area, which reduced the opportunities for the bank to originate small business loans—its strategic focus in this assessment area during the review period. In addition, contacts note that residents face transportation constraints, making it difficult for them to reach The Central Trust Bank's nearest branch, which is nearly 15 miles away. While challenges exist, the analysis revealed an opportunity for the bank to increase its level of lending in LMI areas. As small business loans reflect excellent distribution and carried the most weight toward overall conclusions, the gaps noted in the dispersion analysis bring overall geographic distribution of loans to good.

### **Community Development Lending Activities**

The bank's community development performance demonstrates adequate responsiveness to the community development needs within the Tulsa assessment area. As detailed in the table below, the bank made five community development loans totaling \$6.8 million. The most impactful of these loans is discussed following the table below.

| <b>Community Development Lending</b> |                           |                  |                           |                  |                                      |                  |                             |                  |              |                  |
|--------------------------------------|---------------------------|------------------|---------------------------|------------------|--------------------------------------|------------------|-----------------------------|------------------|--------------|------------------|
|                                      | <b>Affordable Housing</b> |                  | <b>Community Services</b> |                  | <b>Revitalization/ Stabilization</b> |                  | <b>Economic Development</b> |                  | <b>TOTAL</b> |                  |
|                                      | <b>#</b>                  | <b>\$ (000s)</b> | <b>#</b>                  | <b>\$ (000s)</b> | <b>#</b>                             | <b>\$ (000s)</b> | <b>#</b>                    | <b>\$ (000s)</b> | <b>#</b>     | <b>\$ (000s)</b> |
| Community Development Loans          | 3                         | \$1,680          | 1                         | \$1,604          | 1                                    | \$3,477          | -                           | -                | 5            | \$6,760          |

- One loan qualifying as revitalization/stabilization totaling \$3.5 million was made to refinance an existing loan on and fund improvements to a large industrial building located in a moderate-income census tract that is designated as an Oklahoma Priority Enterprise Zone.

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## INVESTMENT TEST

The Central Trust Bank makes an adequate level of qualified community development investments and grants in the Tulsa assessment area. During the review period, the bank had five<sup>4</sup> investments and 24 donations totaling \$647 thousand. Of that total, \$565,560 were prior-period investments still outstanding and \$80,910 were donations to various community development organizations. Noteworthy loans are discussed following the table below.

| Community Development Investments |                    |            |                    |           |                                  |           |                         |           |           |            |
|-----------------------------------|--------------------|------------|--------------------|-----------|----------------------------------|-----------|-------------------------|-----------|-----------|------------|
|                                   | Affordable Housing |            | Community Services |           | Revitalization/<br>Stabilization |           | Economic<br>Development |           | TOTAL     |            |
|                                   | #                  | \$ (000s)  | #                  | \$ (000s) | #                                | \$ (000s) | #                       | \$ (000s) | #         | \$ (000s)  |
| Investments                       | 5                  | 566        | -                  | -         | -                                | -         | -                       | -         | 5         | 566        |
| Donations                         | 1                  | 15         | 18                 | 63        | -                                | -         | 5                       | 3         | 24        | 81         |
| <b>TOTAL</b>                      | <b>6</b>           | <b>581</b> | <b>18</b>          | <b>63</b> | <b>-</b>                         | <b>-</b>  | <b>5</b>                | <b>3</b>  | <b>29</b> | <b>646</b> |

- Five investments in MBS that fund affordable housing to LMI individuals.
- A \$15,000 donation was made to an organization that provides housing to LMI individuals.

## SERVICE TEST

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area, and the bank did not open or close any branches during this review period. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides an adequate level of community development services in the Tulsa assessment area.

### Accessibility of Delivery Systems

The bank operates six branches in the Tulsa assessment area, and the following table illustrates the distribution of these offices by geography income level compared to the distribution of assessment area census tracts and household population by income level of geography.

| Branch Distribution by Geography Income Level |                        |           |         |        |          |             |
|---|------------------------|-----------|---------|--------|----------|-------------|
| Dataset                                       | Geography Income Level |           |         |        |          | TOTAL       |
|   | Low-                   | Moderate- | Middle- | Upper- | Unknown- |             |
| Branches                                      | 0                      | 2         | 2       | 2      | 0        | <b>6</b>    |
|   | 0.0%                   | 33.3%     | 33.3%   | 33.3%  | 0.0%     | <b>100%</b> |
| Census Tracts                                 | 7.2%                   | 28.5%     | 37.4%   | 26.8%  | 0.0%     | <b>100%</b> |
| Household Population                          | 5.9%                   | 25.7%     | 39.7%   | 28.8%  | 0.0%     | <b>100%</b> |

As shown in the previous table, the bank operates two branches (33.3 percent) in moderate-income geographies, which is above the demographic data used for comparison. While the bank does not

<sup>4</sup> Three of the investments were MBS benefitting LMI borrowers in the Tulsa and Oklahoma City assessment areas. The pro-rata values of the MBS benefitting Tulsa are included in the total dollar value.

have any branches located in low-income geographies, only 5.9 percent of assessment area households live in low-income census tracts. Overall, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels.

### **Changes in Branch Locations**

The bank added this assessment area and all branches therein as part of a merger with its affiliate banks during the review period. Otherwise, there were no branches opened or closed in this assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of delivery systems.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are consistent across all branches in the Tulsa assessment area. Branches are open from 9:00 a.m. to 5:00 p.m., Monday through Friday, and branches have drive-up access 8:00 a.m. to 6:00 p.m., Monday through Friday, and Saturdays from 9:00 a.m. to noon. All branches have ITMs with availability Monday through Saturday from 7:00 a.m. to 7:00 p.m., and four branches have loan officers on site, including one moderate-income branch. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and individuals.

### **Community Development Services**

The bank provides an adequate level of community development services in the assessment area. In total, 27 employees provided 1,298 hours of community development services to four different organizations benefitting the bank's assessment areas. Despite challenges posed by the pandemic, services were provided to organizations promoting financial literacy and employment services, and all qualified under the community service community development purpose. Impactful services are described below:

- Twenty-six employees lent their financial expertise by delivering 522 hours of financial education sessions to children in LMI school districts.
- One bank officer dedicated 632 hours, serving as a board member of three organizations that promote financial literacy to underserved LMI individuals.

## OKLAHOMA CITY, OKLAHOMA METROPOLITAN STATISTICAL AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY ASSESSMENT AREA

This assessment area and all branches therein were added during the review period as part of a merger with its affiliate banks. The assessment area includes the entirety of Oklahoma County, one of the seven counties that make up the Oklahoma City, Oklahoma MSA. Its branch network consists of three offices; all of which are full-service facilities. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

| Assessment Area Demographics by Population Income Level |                         |           |         |         |         |
|---|-------------------------|-----------|---------|---------|---------|
| Demographic Type  | Population Income Level |           |         |         | TOTAL   |
|   | Low-                    | Moderate- | Middle- | Upper-  |         |
| Family Population                                       | 44,754                  | 32,453    | 34,687  | 69,537  | 181,431 |
|   | 24.7%                   | 17.9%     | 19.1%   | 38.3%   | 100%    |
| Household Population                                    | 76,183                  | 51,469    | 51,029  | 112,709 | 291,390 |
|   | 26.1%                   | 17.7%     | 17.5%   | 38.7%   | 100%    |

| Assessment Area Demographics by Geography Income Level |                        |           |         |        |          |         |
|--|------------------------|-----------|---------|--------|----------|---------|
| Demographic Type                                       | Geography Income Level |           |         |        |          | TOTAL   |
|  | Low-                   | Moderate- | Middle- | Upper- | Unknown- |         |
| Census Tracts  | 28                     | 85        | 70      | 50     | 8        | 241     |
|  | 11.6%                  | 35.3%     | 29.1%   | 20.8%  | 3.3%     | 100%    |
| Family Population                                      | 17,042                 | 54,259    | 54,266  | 55,524 | 340      | 181,431 |
|  | 9.4%                   | 29.9%     | 29.9%   | 30.6%  | 0.2%     | 100%    |
| Household Population                                   | 27,968                 | 96,111    | 88,352  | 77,701 | 1,258    | 291,390 |
|  | 9.6%                   | 33.0%     | 30.3%   | 26.7%  | 0.4%     | 100%    |
| Business Institutions                                  | 2,806                  | 11,251    | 12,690  | 13,125 | 1,939    | 41,811  |
|  | 6.7%                   | 26.9%     | 30.4%   | 31.4%  | 4.6%     | 100%    |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY ASSESSMENT AREA****LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Oklahoma full-scope assessment area, as displayed in the following table. For this review period, a significant amount of retail lending data and community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| <b>Lending Test Criteria</b>            | <b>Performance</b> |
|---|--------------------|
| Lending Activity                        | Consistent         |
| Loan Distribution by Borrower's Profile | Exceeds            |
| Geographic Distribution of Loans        | Consistent         |
| Community Development Lending Activity  | Consistent         |
| <b>OVERALL</b>                          | <b>Consistent</b>  |

During the review period, the bank made five community development loans totaling \$20.0 million, including one PPP loan for \$8.2 million. These loans qualified for a community development purpose of affordable housing (4) and revitalization/stabilization (1). Noteworthy is that the two of the loans funded the purchase and remodel of large rental housing complexes offering affordable housing in LMI areas.

**INVESTMENT TEST**

The bank's Investment Test performance in the Oklahoma City assessment area is consistent with the investment performance in the full-scope assessment area. The bank's qualified investments included three<sup>5</sup> MBS supporting affordable housing, totaling \$133,242. These investments were made prior to the review period but are still outstanding. The bank also made six qualified donations with a community service purpose, totaling \$2,470. Though this level of investment is lower than in the full-scope assessment area, it is considered consistent as the bank's presence is smaller in the Oklahoma City assessment area.

<sup>5</sup> The three MBS investments benefitted LMI borrowers in the Tulsa and Oklahoma City assessment areas. The pro-rata values of the MBS benefitting Tulsa are included in the total dollar value.

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## SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with performance in the Oklahoma full-scope assessment area, as detailed in the following table:

| <b>Service Test Criteria</b>                  | <b>Performance</b> |
|---|--------------------|
| Accessibility of Delivery Systems             | Consistent         |
| Changes in Branch Locations                   | Exceeds            |
| Reasonableness of Business Hours and Services | Exceeds            |
| Community Development Services                | Below              |
| <b>OVERALL</b>                                | <b>Consistent</b>  |

During the review period, three bank employees provided 77 hours of community development service activities to three different organizations in the assessment area. Despite challenges posed by the pandemic, services were provided to organizations promoting financial literacy and holistic services to LMI individuals, and all qualified under the community Service Test.

## COLORADO

### CRA RATING FOR COLORADO:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**Satisfactory**

**Low Satisfactory**

**Needs to Improve**

**High Satisfactory**

Major factors supporting the institution's Colorado rating include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate dispersion throughout the assessment areas.
- The bank makes a low level of community development loans.
- The bank makes limited use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes a poor level of qualified community development investments and grants.
- Delivery systems are readily accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals
- The bank provides a limited level of community development services.

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Colorado assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the Colorado assessment areas due to lack of volume. For all three assessment areas, HMDA lending carried the most weight in this evaluation, as it was the strategic focus for the bank and comprised the majority of the bank's loan portfolio.

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The bank operates three assessment areas in Colorado; two of which are located in MSAs and one that is located in the nonMSA portion of the state. All three assessment areas were added during the review period upon the opening of one branch per area. The Colorado Springs assessment area was reviewed under full-scope examination procedures as it was the only one established throughout the review period. As such, performance conclusions for the state of Colorado are a reflection of the bank's performance in Colorado Springs.

To augment the evaluation of the full-scope review assessment area, one community contact interview was leveraged. The interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from this interview is included in the *Description of Institution's Operations* sections, as applicable to the assessment area in which the community contact was made.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLORADO

The Central Trust Bank operates three offices (0.6 percent of total branches) in its three CRA assessment areas in Colorado. The following table gives additional detail regarding the bank's operations in the state.

| Assessment Area  | Offices  |               | Deposits<br>As of June 30, 2021 |               | Review Procedures     |
|------------------|----------|---------------|---------------------------------|---------------|-----------------------|
|                  | #        | %             | \$                              | %             |                       |
| Colorado Springs | 1        | 33.3%         | \$5,499                         | 0.04%         | Full Scope            |
| Denver MSA       | 1        | 33.3%         | \$3,149                         | 0.02%         | Limited Scope         |
| Durango nonMSA   | 1        | 33.3%         | \$5,623                         | 0.04%         | Limited Scope         |
| <b>TOTAL</b>     | <b>3</b> | <b>100.0%</b> | <b>\$14,271</b>                 | <b>100.0%</b> | <b>1 - Full Scope</b> |

The bank's deposits in Colorado total \$14.3 million, which represent 0.1 percent of total bank deposits. Given this low relative level, performance in Colorado carries minimal weight when determining institutional level ratings.



**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO****LENDING TEST**

The bank's Lending Test performance in Colorado is rated Low Satisfactory. The test considers the following criteria.

**Lending Activity**

| Full-Scope Review Areas | Lending Activity |
|-------------------------|------------------|
| Colorado Springs        | Good             |

| Limited-Scope Review Areas | Lending Activity |
|----------------------------|------------------|
| Denver                     | Consistent       |
| Durango                    | Consistent       |

Lending levels in the Colorado assessment areas reflect good responsiveness to the credit needs. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

**Borrower and Geographic Distribution**

As displayed in the following tables, the bank's performance by borrower's income and revenue profile is good in Colorado.

| Full-Scope Review Areas | Loan Distribution by Borrower's Profile |
|-------------------------|---|
| Colorado Springs        | Good                                    |

| Limited-Scope Review Areas | Loan Distribution by Borrower's Profile |
|----------------------------|---|
| Denver                     | Consistent                              |
| Durango                    | Consistent                              |

Overall, the bank's geographic distribution of loans reflects adequate penetration throughout Colorado.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|-------------------------|----------------------------------|
| Colorado Springs        | Adequate                         |

| Limited-Scope Review Areas | Geographic Distribution of Loans |
|----------------------------|----------------------------------|
| Denver                     | Exceeds                          |
| Durango                    | Consistent                       |

**Community Development Lending Activities**

The bank entered its Colorado assessment areas during the review period where it planned to operate as a small bank under the affiliate model. Until the merger with its affiliates in October 2021, the requirement to conduct community development activity was not applicable. In addition, the bank was unable to conduct significant community outreach and marketing in the assessment area due to external constraints and the absence of a local CRA specialist. As such, community development activities were limited in Colorado during the review period and are given little weight in this performance evaluation.

Overall, the bank makes a low level of community development loans in its Colorado assessment areas, as displayed below.

| Full-Scope Review Areas | Community Development Lending Activities |
|-------------------------|--|
| Colorado Springs        | Low Level                                |

| Limited-Scope Review Areas | Community Development Lending Activities |
|----------------------------|--|
| Denver                     | Consistent                               |
| Durango                    | Consistent                               |

During the review period, the bank made one community development loan totaling \$660,000 for the purpose of affordable housing. Additional details regarding the composition of the bank's community development lending can be found in the *Lending Test* section for each of the respective assessment areas.

**Product Innovation**

The bank makes limited use of flexible lending practices in serving the credit needs of the Colorado assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Colorado is described below:

- Through the SBA's PPP, the bank originated 212 PPP loans totaling \$10.5 million across the state. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those located in the bank's Colorado assessment areas.

- Specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas, the bank's Home Turf Program allows eligible borrowers to make a reduced minimum down payment, using flexible sources of payment. The bank introduced this product to its Colorado assessment areas during the review period where it originated one mortgage loan, totaling \$385,000.
- From January 1, 2019, to December 31, 2021, the bank originated 36 HomeReady loans, totaling \$9.6 million in its Colorado assessment areas. The HomeReady program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans.
- From 2019 to 2021, the bank originated five loans totaling \$5.6 million through the SBA-CDC/504 Loan Program. Through this program, the bank offered small business loans that support small business operations and/or expansion.
- The bank also originated a significant volume of mortgage loans through government loan programs, including 97 FHA loans, totaling \$28.0 million, seven RD home loans, totaling \$2.6 million, and 258 VA loans, totaling \$106.3 million.

## INVESTMENT TEST

Overall, the bank's performance in Colorado is rated Needs to Improve under the Investment Test. The following tables display investment and grant activity performance in Colorado.

| Full-Scope Review Areas | Investment and Grant Activity |
|-------------------------|-------------------------------|
| Colorado Springs        | Poor                          |

| Limited-Scope Review Areas | Investment and Grant Activity |
|----------------------------|-------------------------------|
| Denver                     | Consistent                    |
| Durango                    | Consistent                    |

The bank's total investment and grant activity included one donation for \$5 thousand. Consideration was given to the constraints described under the Colorado *Community Development Lending Activities* section; however, performance in the Colorado assessment areas needs to improve. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

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## SERVICE TEST

The bank's performance in Colorado is rated High Satisfactory under the Service Test. This test considers the following criteria:

### Accessibility of Delivery Systems

As displayed in the following tables, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels in Colorado.

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|-------------------------|-----------------------------------|
| Colorado Springs        | Readily Accessible                |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|----------------------------|-----------------------------------|
| Denver                     | Below                             |
| Durango                    | Below                             |

### Changes in Branch Locations

The bank's record of opening and closing branches in Colorado has improved access to its service delivery systems, particularly to LMI geographies and individuals. The tables below display the bank's performance under this criterion.

| Full-Scope Review Areas | Changes in Branch Locations |
|-------------------------|-----------------------------|
| Colorado Springs        | Improved Access             |

| Limited-Scope Review Areas | Changes in Branch Locations |
|----------------------------|-----------------------------|
| Denver                     | Below                       |
| Durango                    | Below                       |

### Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the Colorado assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|-------------------------|---|
| Colorado Springs        | Do not vary in a way that inconveniences      |

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|----------------------------|---|
| Denver                     | Below   |
| Durango                    | Below   |

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### **Community Development Services**

The bank provides a limited level of community development services in the Colorado assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Colorado assessment areas.

| <b>Full-Scope Review Areas</b> | <b>Community Development Services</b> |
|--------------------------------|---------------------------------------|
| Colorado Springs               | Limited Level                         |

| <b>Limited-Scope Review Areas</b> | <b>Community Development Services</b> |
|-----------------------------------|---------------------------------------|
| Denver                            | Consistent                            |
| Durango                           | Consistent                            |

During the review period, two bank employees provided 38 hours of community development service activities to two organizations in two of the assessment areas. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

## COLORADO SPRINGS, COLORADO METROPOLITAN STATISTICAL AREA

*(Full-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLORADO SPRINGS ASSESSMENT AREA

#### **Bank Structure**

During the review period, the bank opened its single branch in this assessment area. The bank now operates one full-service office with an ITM onsite in the Colorado Springs assessment area, representing 0.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Number of Delivery Systems by Census Tract Classification |            |                 |               |              |
|---|------------|-----------------|---------------|--------------|
|   | Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| Offices   | 1          | 0               | 0             | 0            |

Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

#### **General Demographics**

The assessment area includes El Paso County, the largest of the two counties comprising the Colorado Springs, Colorado MSA. ACS data shows that the county has experienced significant population growth and is home to 655,024 residents. Contributing to the population are current and former military personnel linked to the five military bases situated throughout the city. Along with the population figures shown in the preceding table, the assessment area has 36,306 businesses; 34,289 of which are small businesses (94.4 percent). As a result, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels.

The Colorado Springs assessment area is the bank's primary operating market in Colorado and contains one of the bank's three branches in the state. According to the FDIC Market Share Report as of June 30, 2021, there are 38 FDIC-insured depository institutions that operate 125 offices in the assessment area. The Central Trust Bank has a small footprint with one office location and a very limited share of the deposit market at 0.05 percent. The bank operates with significant competition in this assessment area from large, nationally recognized financial institutions, regional banks, and local banks and credit unions.

**Income and Wealth Demographics**

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

| Assessment Area Demographics by Geography Income Level |       |           |         |        |          |                |
|--|-------|-----------|---------|--------|----------|----------------|
| Dataset  | Low-  | Moderate- | Middle- | Upper- | Unknown- | TOTAL          |
| Census Tracts  | 7     | 40        | 50      | 31     | 2        | <b>130</b>     |
|  | 5.4%  | 30.8%     | 38.5%   | 23.9%  | 1.5%     | <b>100%</b>    |
| Family Population                                      | 6,804 | 41,729    | 68,668  | 50,821 | 81       | <b>168,103</b> |
|  | 4.1%  | 24.8%     | 40.9%   | 30.2%  | 0.1%     | <b>100%</b>    |

As shown in the preceding table, a significant portion of the geography census tracts are LMI (36.2 percent), primarily moderate-income census tracts (30.8 percent). These areas are concentrated in the city of Colorado Springs, namely the southeastern and central parts of the city. According to 2015 ACS data, the median family income for the assessment area was \$70,838. In comparison, the median family income for the state of Colorado as a whole was above the assessment area at \$74,826. The following table displays the distribution of assessment area families by income level compared to all Colorado families.

| Family Population by Income Level |         |           |         |         |                  |
|-----------------------------------|---------|-----------|---------|---------|------------------|
| Dataset                           | Low-    | Moderate- | Middle- | Upper-  | TOTAL            |
| Colorado Springs                  | 34,246  | 31,046    | 34,169  | 68,642  | <b>168,103</b>   |
|                                   | 20.4%   | 18.5%     | 20.3%   | 40.8%   | <b>100%</b>      |
| Colorado                          | 274,235 | 231,523   | 266,407 | 528,807 | <b>1,300,972</b> |
|                                   | 21.1%   | 17.8%     | 20.5%   | 40.7%   | <b>100%</b>      |

The table above reveals that 38.9 percent of the families in the assessment area are considered LMI, which is identical to the state of Colorado. Furthermore, the percentage of families living below the poverty level in the assessment area (8.4 percent) is similar to the percentage of Colorado families (8.5 percent). Though the median family income in the Colorado Springs assessment area is slightly below that of the state of Colorado, the comparative data indicates that overall the assessment area is similar in affluence.

**Housing Demographics**

The following table provides details of the housing demographics of the assessment area compared to the state of Colorado as a whole.

| Housing Demographics |                      |                     |                             |  |
|----------------------|----------------------|---------------------|-----------------------------|--|
| Dataset              | Median Housing Value | Affordability Ratio | Median Gross Rent (Monthly) | Housing Cost Burden (Renters   Owners) |
| Colorado Springs     | \$218,303            | 26.8%               | \$976                       | 47.3%   21.7%                          |
| Colorado             | \$247,800            | 24.5%               | \$1,002                     | 46.4%   21.8%                          |

Based on affordability ratios, housing values, and rent prices, housing in the assessment area is slightly more affordable than the state of Colorado as a whole. A review of housing cost burden reveals that renters find it marginally less affordable in the assessment area compared to that of the state of Colorado due to a slightly higher median family income at the state level. The community contact indicated that a low inventory of affordable housing coupled with a large number of unbanked LMI families has contributed to the demand for rental properties. In addition, military personnel living in the area tend to rent rather than purchase a home, thereby increasing the rental housing demand. To address housing needs in the area, contacts recommend additional affordable housing properties be constructed in the area and for financial institutions to conduct outreach to LMI families so that they feel more comfortable accessing credit to purchase homes.

### **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 34,289, or 94.4 percent, of businesses in the assessment area have annual revenues under \$1 million. The community contact asserted that the area has a positive environment for small businesses with small business development councils and nonprofits that offer mentorships and zero-interest start-up loans. County business patterns indicate that there are 279,473 paid employees in the assessment area. By percentage of employees, the largest job category in the assessment area is the government (18.5 percent), resulting primarily from the presence of five military bases. The next largest job categories are healthcare and social assistance (13.3 percent) and retail trade (11.6 percent). The community contact pointed out that there are pockets of the county where employment opportunities are limited, such as the southeastern and central parts of the city where there are few businesses, restaurants, and tourist attractions.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Colorado.

| <b>Unemployment Data</b> |                            |                            |                             |
|--------------------------|----------------------------|----------------------------|-----------------------------|
| <b>Dataset</b>           | <b>2019 Annual Average</b> | <b>2020 Annual Average</b> | <b>May 2021 YTD Average</b> |
| Colorado Springs         | 3.2%                       | 7.3%                       | 5.6%                        |
| Colorado                 | 2.7%                       | 7.3%                       | 5.4%                        |

As shown in the preceding table, unemployment levels were slightly higher than the state of Colorado in 2019 and the same as the state in 2020. In 2020, unemployment levels significantly increased in line with the national unemployment trend resulting from the impact of the pandemic. As shown in the table, unemployment levels in the assessment area and the state declined to a similar level in 2021.

### **Community Contact Information**

For this assessment area, a community contact interview was used to ascertain specific credit needs, opportunities, and local market conditions. The contact represented an organization that



provides families with community development services such as food, shelter, and education. The contact characterized the economy as good and growing. The largest employers in the region are military and defense contracting companies due to the high concentration of military bases and the absence of any major industrial or corporate headquarters. According to the contact, wages in the area have slowly increased, and unemployment has kept pace with the rest of the country overall. However, southeastern and central parts of Colorado Springs have maintained a lower comparative level of economic prosperity as they host fewer businesses, restaurants, and tourist attractions. As such, residents in these areas tend to have a harder time finding work with a sufficient income.

The contact believes Colorado Springs fared better than other areas during the pandemic as a large percentage of the labor force are members of military and, therefore, retained their jobs. In addition, the city reacted very quickly and put in place programs and financial assistance to help community members who were struggling the most.

Specific to affordable housing, the contact describes housing in the area as good. According to the contact, the majority of affordable housing is concentrated in the southeast and central parts of Colorado Springs, and there is currently a shortage of stock. Though some new affordable housing is in the process of being built, more is needed to adequately serve LMI residents. In addition to owner-occupied housing, affordable rental properties are also in high demand. The contact indicated that there is a high portion of renters in the area due to the high percentage of military members who tend to rent housing. Overall, the low inventories and the rising cost of housing are the primary obstacles for residents to obtain affordable housing.

Regarding small businesses, the contact describes the community as having a positive environment for small businesses and start-ups.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLORADO SPRINGS ASSESSMENT AREA

### LENDING TEST

Lending levels reflect good responsiveness to the credit needs of the Colorado Springs assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Lastly, the bank makes a low level of community development loans in this assessment area.

### Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

| <b>Summary of Lending Activity</b>                |            |               |                  |               |
|---|------------|---------------|------------------|---------------|
| <b>January 1, 2019, through December 31, 2020</b> |            |               |                  |               |
| <b>Loan Type</b>                                  | <b>#</b>   | <b>%</b>      | <b>\$ (000s)</b> | <b>%</b>      |
| Home Improvement                                  | 0          | 0.0%          | 0                | 0.0%          |
| Home Purchase                                     | 471        | 55.0%         | 156,061          | 59.2%         |
| Multifamily Housing                               | 0          | 0.0%          | 0                | 0.0%          |
| Refinancing                                       | 358        | 41.8%         | 105,665          | 40.1%         |
| Other   | 4          | 0.5%          | 791              | 0.3%          |
| <b>TOTAL HMDA</b>                                 | <b>833</b> | <b>97.2%</b>  | <b>262,517</b>   | <b>99.7%</b>  |
| <b>Small Business</b>                             | <b>24</b>  | <b>2.8%</b>   | <b>880</b>       | <b>0.3%</b>   |
| <b>Small Farm</b>                                 | <b>0</b>   | <b>0.0%</b>   | <b>0</b>         | <b>0.0%</b>   |
| <b>TOTAL LOANS</b>                                | <b>857</b> | <b>100.0%</b> | <b>263,397</b>   | <b>100.0%</b> |

The bank's lending levels reflect good responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 3.0 percent by number and 11.0 percent by dollar were made in the Colorado Springs MSA in 2019 and 2.0 percent by number and 4.1 percent by dollar in 2020. These percentages are higher than the percentage of total bank deposits held (0.04 percent by dollar) and total bank branches located (0.6 percent) in the Colorado Springs assessment area. Contributing to this lending level was the presence of an LPO in this assessment area prior to the establishment of a full-service branch during the review period. This level was compared to those of the other lenders in the assessment area. Among the HMDA aggregate lenders, the bank ranked 38<sup>th</sup> out of 587 lenders in 2019 and 35<sup>th</sup> out of 641 lenders in 2020. Regarding CRA lending, the bank did not report data in this assessment area in 2019 and appeared 38<sup>th</sup> out of 165 CRA aggregate lenders in 2020. This comparative data demonstrates that bank's good responsiveness to the area's credit needs.

### **Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the Colorado Springs assessment area is considered good overall based on the performance of each of the two loan products reviewed. When determining overall conclusions, HMDA loans are given the greatest weight, followed by small business loans. Small farm lending is not assessed due to the lack of originations.

#### *HMDA Lending*

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. The percentage of loans made to low-income borrowers in 2019 and 2020 (5.6 percent and 4.0 percent, respectively) was greater than the percentage of aggregate HMDA loans (5.4 percent and 3.7 percent, respectively) and less than the percentage of families in the assessment area that are low income (20.4 percent in both years), representing good distribution. The percentage of loans made to moderate-income borrowers in 2019 and 2020 (21.6 percent and 17.6 percent, respectively) was above the aggregate level (17.7 percent and 15.2 percent, respectively) and above or near the demographic figure (18.5 percent in both years), reflecting excellent distribution. As the primary mortgage loan product needed in the area, according to the community contact, home purchase loan data was analyzed and showed that bank performance was consistent, further solidifying the bank's performance among LMI individuals. Given the higher percentage of low-income families in the assessment area, the bank's related performance is given more weight. Therefore, overall distribution was good overall during the review period.

#### *Small Business Lending*

The bank's small business lending reflects an adequate distribution to businesses of different sizes overall. As the bank did not make any small business loans in 2019, only 2020 data was reviewed. The percentage of small business loans made to businesses with annual revenues of \$1 million or less (8.3 percent) was significantly lower than the aggregate level (43.9 percent) as well as the demographic estimate of assessment area businesses with this revenue profile (94.4 percent). Initially, this portrays a poor level of lending; however, a further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 90.2 percent of total PPP had loan sizes of \$100,00 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community; therefore, overall distribution of loans to businesses of different revenue sizes is adequate.

### **Geographic Distribution of Loans**

Overall, the geographic distribution of loans in the assessment area is adequate based on the two products reviewed. As noted previously, the assessment area includes seven low-income and 40 moderate-income census tracts, representing 36.2 percent of all assessment area census tracts.

### *HMDA Lending*

The geographic distribution of HMDA loans during the review period is considered adequate overall in both years. In 2019, the bank originated 2.3 percent of HMDA loans in low-income census tracts, which is near the aggregate (2.5 percent) and below the percentage of owner-occupied units (3.3 percent), demonstrating adequate performance. The bank's distribution in moderate-income census tracts (17.6 percent) is near the aggregate percentage (18.2 percent) and under the demographic figure (20.7 percent) and is also considered adequate.

In 2020, the percentage of HMDA loans made in low-income census tracts (1.5 percent) fell below the aggregate (2.1 percent) and remained under the demographic figure (3.3 percent). Home purchase data shows that the bank's distribution (2.4 percent) met the aggregate level (2.4 percent) and remained under the demographic (3.3 percent); therefore, performance in low-income census tracts remained adequate. In moderate-income census tracts, bank distribution (13.9 percent) decreased in 2020, placing it under the aggregate (16.1 percent) and demographic figures (20.7 percent). A review of home purchase loan data for moderate-income census tracts displays a similar comparative performance; therefore, distribution is considered adequate.

### *Small Business Lending*

The distribution of small business loans by geography income level is considered adequate. As the bank did not make any small business loans in 2019, only 2020 data was reviewed. The bank's level of small business lending in low-income census tracts (8.3 percent) was near the aggregate lending level (8.6 percent) and above the demographic figure (7.8 percent); therefore, distribution is considered good. The percentage of small business loans made in moderate-income census tracts (12.5 percent) was significantly under the aggregate level (24.0 percent) and the demographic figure (23.8 percent); therefore, distribution is considered poor. Combined performance in LMI areas is adequate.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure, and no conspicuous lending gaps in LMI areas were noted.

### **Community Development Lending Activities**

The Central Trust Bank makes a low level of community development loans in the Colorado Springs assessment area. During the review period, the bank did not make any qualified community development loans in this assessment area. As described in the Colorado *Community Development Lending Activities* section, the bank faced several constraints during the review period, which were considered when evaluating its performance in Colorado Springs.

**INVESTMENT TEST**

The Central Trust Bank makes a poor level of community development investments in the Colorado Springs assessment area, having made no qualified investments or donations during the review period. When determining the bank's performance, consideration was given to the constraints described in the Colorado *Community Development Lending Activities* section.

**SERVICE TEST**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has improved access of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Colorado Springs assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides a limited level of community development services in the Colorado Springs assessment area.

**Accessibility of Delivery Systems**

The bank operates one branch in the Colorado Springs assessment area, which is in a low-income census tract. In comparison, the following table illustrates the distribution of assessment area census tracts and household population by income level of geography.

| <b>Branch Distribution by Geography Income Level</b> |                               |                  |                |               |                 |                         |
|--|-------------------------------|------------------|----------------|---------------|-----------------|-------------------------|
| <b>Dataset</b>                                       | <b>Geography Income Level</b> |                  |                |               |                 | <b>TOTAL</b>            |
|  | <b>Low-</b>                   | <b>Moderate-</b> | <b>Middle-</b> | <b>Upper-</b> | <b>Unknown-</b> |                         |
| Branches   | 1<br>100%                     | 0<br>0.0%        | 0<br>0.0%      | 0<br>0.0%     | 0<br>0.0%       | <b>1</b><br><b>100%</b> |
| Census Tracts  | 5.4%                          | 30.8%            | 38.5%          | 23.9%         | 1.5%            | <b>100%</b>             |
| Household Population                                 | 5.1%                          | 28.5%            | 39.5%          | 26.9%         | 0.0%            | <b>100%</b>             |

As shown in the previous table, the bank's only branch in this assessment area is located in a low-income census tract, which demonstrates a branching strategy in place to promote service delivery systems that are readily accessible to geographies and individuals of different income levels.

**Changes in Branch Locations**

The bank did not operate in this assessment area at the start of the review period, during which the only branch office in this assessment area was opened in a low-income census tract; no branches were closed during the review period. Therefore, the bank's record of opening and closing branches in the assessment area has improved the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The only branch in this assessment has a loan officer on site and standard lobby business hours, which are Monday through Friday from 9:00 a.m. to 5:00 p.m.; there is also ITM access with extended hours Monday through Saturday. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

**Community Development Services**

The Central Trust Bank provides a limited level of community development services in the Colorado Springs assessment area. During the review period, bank employees provided no community development services in the area. When determining the bank's performance, consideration was given to the constraints described in the Colorado *Community Development Lending Activities* section.

## DENVER, COLORADO METROPOLITAN STATISTICAL AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DENVER ASSESSMENT AREA

The bank's Denver assessment area is composed of Adams, Arapahoe, Denver, and Jefferson Counties, four of the 10 counties that make up the Denver–Aurora–Lakewood, Colorado MSA. The bank operates one full-service branch in a middle-income census tract with an ITM on site. This assessment area was added in February 2020 when the single branch was opened. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to most of its assessment area. It may experience challenges serving the outermost portions of its assessment area, namely western Adams and Arapahoe counties; however, it is accessible to the counties' LMI areas.

| Assessment Area Demographics by Population Income Level |                         |                  |                  |                  |                               |
|---|-------------------------|------------------|------------------|------------------|-------------------------------|
| Demographic Type  | Population Income Level |                  |                  |                  | TOTAL                         |
|   | Low-                    | Moderate-        | Middle-          | Upper-           |                               |
| Family Population                                       | 127,785<br>23.6%        | 100,982<br>18.7% | 111,333<br>20.6% | 200,965<br>37.1% | <b>541,065</b><br><b>100%</b> |
| Household Population                                    | 223,816<br>25.3%        | 155,044<br>17.5% | 164,350<br>18.6% | 341,706<br>38.6% | <b>884,916</b><br><b>100%</b> |

| Assessment Area Demographics by Geography Income Level |                        |                  |                  |                  |             |                               |
|--|------------------------|------------------|------------------|------------------|-------------|-------------------------------|
| Dataset  | Geography Income Level |                  |                  |                  |             | TOTAL                         |
|  | Low-                   | Moderate-        | Middle-          | Upper-           | Unknown-    |                               |
| Census Tracts  | 51<br>9.7%             | 147<br>28.0%     | 173<br>32.9%     | 150<br>28.5%     | 5<br>1.0%   | <b>526</b><br><b>100%</b>     |
| Family Population                                      | 47,570<br>8.8%         | 143,321<br>26.5% | 185,398<br>34.3% | 164,759<br>30.5% | 17<br>0.0%  | <b>541,065</b><br><b>100%</b> |
| Household Population                                   | 84,395<br>9.5%         | 241,619<br>27.3% | 311,535<br>35.2% | 247,308<br>28.0% | 59<br>0.0%  | <b>884,916</b><br><b>100%</b> |
| Business Institutions                                  | 12,372<br>8.3%         | 32,939<br>22.0%  | 48,961<br>32.7%  | 55,040<br>36.7%  | 578<br>0.4% | <b>149,890</b><br><b>100%</b> |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER, COLORADO MSA ASSESSMENT AREA****LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Colorado full-scope assessment area, as displayed in the following table. As the bank opened a branch in this assessment area during the latter end of the review period, a reduced level of retail lending data and community development activity is available for evaluation. These limitations were taken into consideration when evaluating the bank's performance. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| <b>Lending Test Criteria</b>                | <b>Performance</b> |
|---|--------------------|
| Lending Activity                            | Consistent         |
| Distribution of Loans by Borrower's Profile | Consistent         |
| Geographic Distribution of Loans            | Exceeds            |
| Community Development Lending Activity      | Consistent         |
| <b>OVERALL</b>                              | <b>Consistent</b>  |

During the review period, the bank made one community development loan for \$660,000 for the purpose of affordable housing. Given the limitations described above and in the Colorado *Community Development Lending Activities* section, this level of lending is considered consistent with the level in the full scope assessment area.

**INVESTMENT TEST**

The bank's Investment Test performance in the Denver assessment area is consistent with the investment performance in the full-scope assessment area where the bank made no community development investments. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

**SERVICE TEST**

The bank's service performance in this assessment area is below the service performance in the Colorado full-scope assessment area, as detailed in the following table:

| <b>Service Test Criteria</b>                  | <b>Performance</b> |
|---|--------------------|
| Accessibility of Delivery Systems             | Below              |
| Changes in Branch Locations                   | Below              |
| Reasonableness of Business Hours and Services | Below              |
| Community Development Services                | Consistent         |
| <b>OVERALL</b>                                | <b>Below</b>       |



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During the review period, one bank employee provided two hours of community development service activities to an organization supporting area small businesses. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

## DURANGO, COLORADO NONMETROPOLITAN STATISTICAL AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DURANGO, COLORADO NONMSA ASSESSMENT AREA

The bank's Durango nonMSA assessment area is composed of La Plata County where it has one full-service branch in a middle-income census tract with an ITM on site. This assessment area was added in May 2021 when the single branch was opened. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to its assessment area.

| Assessment Area Demographics by Population Income Level |                         |                |                |                 |                              |
|---|-------------------------|----------------|----------------|-----------------|------------------------------|
| Demographic Type  | Population Income Level |                |                |                 | TOTAL                        |
|   | Low-                    | Moderate-      | Middle-        | Upper-          |                              |
| Family Population                                       | 1,645<br>12.7%          | 1,924<br>14.9% | 2,696<br>20.9% | 6,660<br>51.5%  | <b>12,925</b><br><b>100%</b> |
| Household Population                                    | 3,827<br>17.8%          | 2,997<br>13.9% | 3,764<br>17.5% | 10,925<br>50.8% | <b>21,513</b><br><b>100%</b> |

| Assessment Area Demographics by Geography Income Level |                        |           |                |                 |           |                              |
|--|------------------------|-----------|----------------|-----------------|-----------|------------------------------|
| Dataset  | Geography Income Level |           |                |                 |           | TOTAL                        |
|  | Low-                   | Moderate- | Middle-        | Upper-          | Unknown-  |                              |
| Census Tracts  | 0<br>0.0%              | 0<br>0.0% | 3<br>30.0%     | 7<br>70.0%      | 0<br>0.0% | <b>10</b><br><b>100%</b>     |
| Family Population                                      | 0<br>0.0%              | 0<br>0.0% | 3,203<br>24.8% | 9,722<br>75.2%  | 0<br>0.0% | <b>12,925</b><br><b>100%</b> |
| Household Population                                   | 0<br>0.0%              | 0<br>0.0% | 6,083<br>28.3% | 15,430<br>71.7% | 0<br>0.0% | <b>21,513</b><br><b>100%</b> |
| Business Institutions                                  | 0<br>0.0%              | 0<br>0.0% | 1,957<br>43.3% | 2,563<br>56.7%  | 0<br>0.0% | <b>4,233</b><br><b>100%</b>  |

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DURANGO ASSESSMENT AREA

### LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Colorado full-scope assessment area, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| Lending Test Criteria                       | Performance       |
|---|-------------------|
| Lending Activity                            | Consistent        |
| Distribution of Loans by Borrower's Profile | Consistent        |
| Geographic Distribution of Loans            | Consistent        |
| Community Development Lending Activity      | Consistent        |
| <b>OVERALL</b>                              | <b>Consistent</b> |

During the review period, the bank originated zero community development loans in Durango. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

### INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the Colorado full-scope assessment area. During the review period, the bank made one qualified community development donation for \$5,000 to an organization that provides community services to LMI children. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

### SERVICE TEST

The bank's service performance in this assessment area is below the service performance in the Colorado full-scope assessment area, as detailed in the following table:

| Service Test Criteria                         | Performance  |
|---|--------------|
| Accessibility of Delivery Systems             | Below        |
| Changes in Branch Locations                   | Below        |
| Reasonableness of Business Hours and Services | Below        |
| Community Development Services                | Consistent   |
| <b>OVERALL</b>                                | <b>Below</b> |

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The Central Trust Bank  
Jefferson City, Missouri

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CRA Performance Evaluation  
May 16, 2022

During the review period, one bank employee provided 36 hours of community development service activities to an organization supporting area small businesses. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

## SCOPE OF EXAMINATION TABLES

| TIME PERIOD REVIEWED         |  |   |
|------------------------------|--|---|
| Assessment Area              | Small Business, HMDA, and Small Farm Lending   | Community Development Activities  |
| Jefferson City               | 1/1/2019 – 12/31/2020  | 10/1/2018 – 12/31/2021  |
| Springfield                  | 1/1/2019 – 12/31/2020  | 10/1/2018 – 12/31/2021  |
| Mid-Missouri                 | <ul style="list-style-type: none"> <li>1/1/2020 – 12/31/2020 (Pettis, Randolph, and Audrain Counties)</li> <li>1/1/2019 – 12/31/2020 (Camden, Miller, Morgan, and Johnson Counties)</li> </ul> | <ul style="list-style-type: none"> <li>11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties)</li> <li>7/27/2020 – 12/31/2021 (Pettis County)</li> <li>10/7/2020 – 12/31/2021 (Randolph and Audrain Counties)</li> <li>10/1/2018 – 12/31/2021 (Johnson County)</li> </ul> |
| Columbia                     | 1/1/2020 – 12/31/2020  | 12/6/2020 – 12/31/2021  |
| Branson                      | 1/1/2019 – 12/31/2020  | 7/15/2019 – 12/31/2021  |
| Kansas City                  | 1/1/2020 – 12/31/2020  | 11/2/2020 – 12/31/2021  |
| St. Louis                    | 1/1/2019 – 12/31/2020  | 10/1/2018 – 12/31/2021  |
| Tulsa                        | 1/1/2019 – 12/31/2020  | 3/11/2019 – 12/31/2021  |
| Oklahoma City                | 1/1/2019 – 12/31/2020  | 3/11/2019 – 12/31/2021  |
| Colorado Springs             | 1/1/2019 – 12/31/2020  | 10/18/2018 – 12/31/2021   |
| Denver                       | 1/1/2019 – 2/25/2020   | 2/25/2020 – 12/31/2021  |
| Durango                      | 1/1/2019 – 12/31/2020  | 5/21/2021 – 12/31/2021  |
| <b>FINANCIAL INSTITUTION</b> |  | <b>PRODUCTS REVIEWED</b>  |
| The Central Trust Bank       |  | Small Business<br>HMDA<br>Small Farm Loans  |
| <b>AFFILIATES</b>            | <b>AFFILIATE RELATIONSHIP</b>  | <b>PRODUCTS REVIEWED</b>  |
| Not Applicable               |  |   |

| Assessment Area – Examination Scope Details |             |              |                       |                  |                       |
|---|-------------|--------------|-----------------------|------------------|-----------------------|
| Assessment Area                             | Rated Area  | # of Offices | Deposits (\$ 000s)    | Branches Visited | CRA Review Procedures |
|   |             |              | (as of June 30, 2021) |                  |                       |
| Jefferson City                              | Missouri    | 16           | \$3,049,070           | 1                | Full-Scope            |
| Springfield                                 | Missouri    | 21           | \$1,573,455           | -                | Full-Scope            |
| Mid-Missouri                                | Missouri    | 20           | \$2,138,947           | -                | Limited-Scope         |
| Columbia                                    | Missouri    | 15           | \$2,251,623           | -                | Limited-Scope         |
| Branson                                     | Missouri    | 5            | \$471,246             | -                | Limited-Scope         |
| Kansas City                                 | Kansas City | 49           | \$3,391,976           | -                | Full-Scope            |
| St. Louis                                   | St. Louis   | 16           | \$1,812,063           | -                | Full-Scope            |
| Tulsa                                       | Oklahoma    | 6            | \$567,153             | -                | Full-Scope            |
| Oklahoma City                               | Oklahoma    | 3            | \$28,442              | -                | Limited-Scope         |
| Colorado Springs                            | Colorado    | 1            | \$5,499               | -                | Full-Scope            |
| Denver                                      | Colorado    | 1            | \$3,149               | -                | Limited-Scope         |
| Durango                                     | Colorado    | 1            | \$5,623               | -                | Limited-Scope         |
| <b>OVERALL</b>                              |             | <b>154</b>   | <b>\$15,298,246</b>   | <b>1</b>         | <b>6 Full-Scope</b>   |

## Appendix B

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN STATISTICAL  
AREA RATINGS**

| <b>State or Multistate MSA</b> | <b>Lending Test Rating</b> | <b>Investment Test Rating</b> | <b>Service Test Rating</b> | <b>Overall Rating</b> |
|--------------------------------|----------------------------|-------------------------------|----------------------------|-----------------------|
| Missouri                       | High Satisfactory          | High Satisfactory             | High Satisfactory          | <b>Satisfactory</b>   |
| Kansas City                    | High Satisfactory          | Low Satisfactory              | Low Satisfactory           | <b>Satisfactory</b>   |
| St. Louis                      | High Satisfactory          | High Satisfactory             | High Satisfactory          | <b>Satisfactory</b>   |
| Oklahoma                       | Low Satisfactory           | Low Satisfactory              | Low Satisfactory           | <b>Satisfactory</b>   |
| Colorado                       | Low Satisfactory           | Needs to Improve              | High Satisfactory          | <b>Satisfactory</b>   |

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Investment, and Service Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's *Interagency Large Institution CRA Examination Procedures*.

| <b>State or Multistate MSA</b> | <b>Lending Test Rating</b> | <b>Investment Test Rating</b> | <b>Service Test Rating</b> | <b>Total Points</b> | <b>Overall Rating</b> |
|--------------------------------|----------------------------|-------------------------------|----------------------------|---------------------|-----------------------|
| Missouri                       | 9                          | 4                             | 4                          | 17                  | <b>Satisfactory</b>   |
| Kansas City                    | 9                          | 3                             | 3                          | 15                  | <b>Satisfactory</b>   |
| St. Louis                      | 9                          | 4                             | 4                          | 17                  | <b>Satisfactory</b>   |
| Oklahoma                       | 6                          | 3                             | 3                          | 12                  | <b>Satisfactory</b>   |
| Colorado                       | 6                          | 1                             | 4                          | 11                  | <b>Satisfactory</b>   |

## LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

## MISSOURI

Jefferson City

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |                |               |                               |                     |               |
|--|------------|---------------|----------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)      | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 8          | 1.2%          | 473            | 0.5%          | 0.4%                          | 0.6%                | 0.2%          |
| Moderate   | 37         | 5.6%          | 3,668          | 3.6%          | 6.9%                          | 7.2%                | 5.4%          |
| Middle   | 427        | 64.8%         | 64,319         | 62.9%         | 71.2%                         | 70.0%               | 67.3%         |
| Upper  | 187        | 28.4%         | 33,831         | 33.1%         | 21.4%                         | 22.2%               | 27.0%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>659</b> | <b>100.0%</b> | <b>102,291</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                               |                     |               |
| Low  | 3          | 0.8%          | 209            | 0.3%          | 0.4%                          | 0.3%                | 0.1%          |
| Moderate   | 10         | 2.6%          | 1,115          | 1.6%          | 6.9%                          | 4.5%                | 2.9%          |
| Middle   | 236        | 61.0%         | 38,431         | 56.9%         | 71.2%                         | 67.0%               | 64.0%         |
| Upper  | 138        | 35.7%         | 27,834         | 41.2%         | 21.4%                         | 28.1%               | 32.9%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.1%                | 0.0%          |
| <b>TOTAL</b>   | <b>387</b> | <b>100.0%</b> | <b>67,589</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                               |                     |               |
| Low  | 1          | 4.0%          | 50             | 4.1%          | 0.4%                          | 1.9%                | 1.2%          |
| Moderate   | 1          | 4.0%          | 225            | 18.5%         | 6.9%                          | 3.7%                | 5.8%          |
| Middle   | 15         | 60.0%         | 446            | 36.6%         | 71.2%                         | 71.3%               | 68.7%         |
| Upper  | 8          | 32.0%         | 497            | 40.8%         | 21.4%                         | 22.2%               | 21.9%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.9%                | 2.4%          |
| <b>TOTAL</b>   | <b>25</b>  | <b>100.0%</b> | <b>1,218</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 11.1%                         | 6.7%                | 3.7%          |
| Moderate   | 4          | 40.0%         | 3,758          | 61.5%         | 29.8%                         | 11.1%               | 17.7%         |
| Middle   | 6          | 60.0%         | 2,349          | 38.5%         | 37.6%                         | 73.3%               | 69.1%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 21.5%                         | 8.9%                | 9.5%          |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>10</b>  | <b>100.0%</b> | <b>6,107</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 6.9%                          | 25.0%               | 34.5%         |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 71.2%                         | 56.3%               | 51.5%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 21.4%                         | 18.8%               | 14.0%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| Moderate   | 1          | 4.2%          | 14             | 0.5%          | 6.9%                          | 3.1%                | 1.1%          |
| Middle   | 16         | 66.7%         | 1,392          | 44.9%         | 71.2%                         | 72.3%               | 58.7%         |
| Upper  | 7          | 29.2%         | 1,696          | 54.7%         | 21.4%                         | 24.6%               | 40.3%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>24</b>  | <b>100.0%</b> | <b>3,102</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 0.4%          | 0.0%          | 0.0%          |
| Moderate                  | 0            | 0.0%          | 0              | 0.0%          | 6.9%          | 2.5%          | 1.5%          |
| Middle                    | 0            | 0.0%          | 0              | 0.0%          | 71.2%         | 77.5%         | 77.1%         |
| Upper                     | 0            | 0.0%          | 0              | 0.0%          | 21.4%         | 20.0%         | 21.4%         |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |              |               |                |               |               |               |               |
| Low                       | 12           | 1.1%          | 732            | 0.4%          | 0.4%          | 0.6%          | 0.3%          |
| Moderate                  | 53           | 4.8%          | 8,780          | 4.9%          | 6.9%          | 6.2%          | 4.9%          |
| Middle                    | 700          | 63.3%         | 106,937        | 59.3%         | 71.2%         | 69.1%         | 66.1%         |
| Upper                     | 340          | 30.8%         | 63,858         | 35.4%         | 21.4%         | 24.1%         | 28.6%         |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.1%          | 0.1%          |
| <b>TOTAL</b>              | <b>1,105</b> | <b>100.0%</b> | <b>180,307</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |              |               |                |                               |                     |               |               |
|--|--------------|---------------|----------------|-------------------------------|---------------------|---------------|---------------|
| Census Tract<br>Income Level   | Bank Loans   |               |                | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |               |
|  | #            | %             | \$ (000s)      |                               | #                   | %             | \$ %          |
| Home Purchase Loans  |              |               |                |                               |                     |               |               |
| Low  | 3            | 0.4%          | 166            | 0.1%                          | 0.4%                | 0.7%          | 0.3%          |
| Moderate   | 46           | 6.0%          | 5,335          | 3.9%                          | 6.9%                | 6.2%          | 5.2%          |
| Middle   | 491          | 63.9%         | 83,281         | 61.6%                         | 71.2%               | 69.1%         | 66.1%         |
| Upper  | 228          | 29.7%         | 46,329         | 34.3%                         | 21.4%               | 24.0%         | 28.4%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%                          | 0.0%                | 0.0%          | 0.0%          |
| <b>TOTAL</b>   | <b>768</b>   | <b>100.0%</b> | <b>135,111</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| Refinance  |              |               |                |                               |                     |               |               |
| Low  | 3            | 0.2%          | 307            | 0.1%                          | 0.4%                | 0.1%          | 0.1%          |
| Moderate   | 40           | 2.9%          | 5,485          | 2.2%                          | 6.9%                | 4.1%          | 3.1%          |
| Middle   | 819          | 59.8%         | 144,597        | 57.7%                         | 71.2%               | 65.4%         | 63.3%         |
| Upper  | 507          | 37.0%         | 100,084        | 40.0%                         | 21.4%               | 30.4%         | 33.5%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%                          | 0.0%                | 0.0%          | 0.0%          |
| <b>TOTAL</b>   | <b>1,369</b> | <b>100.0%</b> | <b>250,473</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| Home Improvement   |              |               |                |                               |                     |               |               |
| Low  | 0            | 0.0%          | 0              | 0.0%                          | 0.4%                | 1.2%          | 1.0%          |
| Moderate   | 2            | 11.8%         | 66             | 5.0%                          | 6.9%                | 13.6%         | 12.4%         |
| Middle   | 10           | 58.8%         | 722            | 54.9%                         | 71.2%               | 70.4%         | 72.3%         |
| Upper  | 5            | 29.4%         | 526            | 40.0%                         | 21.4%               | 14.8%         | 14.3%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%                          | 0.0%                | 0.0%          | 0.0%          |
| <b>TOTAL</b>   | <b>17</b>    | <b>100.0%</b> | <b>1,314</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| Multifamily Loans  |              |               |                |                               |                     |               |               |
| Low  | 1            | 11.1%         | 191            | 5.7%                          | 11.1%               | 14.3%         | 3.0%          |
| Moderate   | 2            | 22.2%         | 460            | 13.7%                         | 29.8%               | 16.7%         | 6.2%          |
| Middle   | 4            | 44.4%         | 1,166          | 34.7%                         | 37.6%               | 61.9%         | 80.4%         |
| Upper  | 2            | 22.2%         | 1,541          | 45.9%                         | 21.5%               | 7.1%          | 10.4%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%                          | 0.0%                | 0.0%          | 0.0%          |
| <b>TOTAL</b>   | <b>9</b>     | <b>100.0%</b> | <b>3,358</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| Other Purpose LOC  |              |               |                |                               |                     |               |               |
| Low  | 0            | 0.0%          | 0              | 0.0%                          | 0.4%                | 0.0%          | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%                          | 6.9%                | 28.6%         | 31.8%         |
| Middle   | 0            | 0.0%          | 0              | 0.0%                          | 71.2%               | 71.4%         | 68.2%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%                          | 21.4%               | 0.0%          | 0.0%          |
| Unknown  | 0            | 0.0%          | 0              | 0.0%                          | 0.0%                | 0.0%          | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>                   | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |



## Appendix C (continued)

| Other Purpose Closed/Exempt |              |               |                |               |               |               |               |
|-----------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 0.4%          | 0.0%          | 0.0%          |
| Moderate                    | 1            | 6.3%          | 75             | 5.9%          | 6.9%          | 11.1%         | 16.3%         |
| Middle                      | 11           | 68.8%         | 755            | 59.4%         | 71.2%         | 63.0%         | 60.7%         |
| Upper                       | 4            | 25.0%         | 442            | 34.7%         | 21.4%         | 25.9%         | 23.0%         |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>                | <b>16</b>    | <b>100.0%</b> | <b>1,272</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Purpose Not Applicable      |              |               |                |               |               |               |               |
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 0.4%          | 2.2%          | 1.6%          |
| Moderate                    | 0            | 0.0%          | 0              | 0.0%          | 6.9%          | 7.7%          | 7.7%          |
| Middle                      | 0            | 0.0%          | 0              | 0.0%          | 71.2%         | 70.3%         | 68.7%         |
| Upper                       | 0            | 0.0%          | 0              | 0.0%          | 21.4%         | 19.8%         | 22.0%         |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>                | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans   |              |               |                |               |               |               |               |
| Low                         | 7            | 0.3%          | 664            | 0.2%          | 0.4%          | 0.5%          | 0.2%          |
| Moderate                    | 91           | 4.2%          | 11,421         | 2.9%          | 6.9%          | 5.2%          | 4.1%          |
| Middle                      | 1,335        | 61.3%         | 230,521        | 58.9%         | 71.2%         | 66.9%         | 64.7%         |
| Upper                       | 746          | 34.2%         | 148,922        | 38.0%         | 21.4%         | 27.5%         | 31.0%         |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>                | <b>2,179</b> | <b>100.0%</b> | <b>391,528</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                 |                        |               |
|---|---------------------------|---------------|----------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | ##%           | \$ (000s)      | \$ %          |                 | %                      | \$ %          |
| Low   | 74                        | 6.3%          | 8,669          | 8.3%          | 8.1%            | 6.2%                   | 7.7%          |
| Moderate  | 176                       | 15.0%         | 13,077         | 12.5%         | 13.2%           | 12.0%                  | 13.3%         |
| Middle  | 612                       | 52.1%         | 47,743         | 45.6%         | 52.5%           | 54.6%                  | 47.8%         |
| Upper   | 312                       | 26.6%         | 35,322         | 33.7%         | 26.2%           | 24.6%                  | 30.7%         |
| Unknown   | 0                         | 0.0%          | 0              | 0.0%          | 0.0%            | 2.6%                   | 0.5%          |
| <b>TOTAL</b>  | <b>1,174</b>              | <b>100.0%</b> | <b>104,811</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                    |                        |               |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | ##%           | \$ (000s)      | \$ %          |                    | %                      | \$ %          |
| Low   | 134                       | 6.3%          | 13,836         | 7.0%          | 8.3%               | 6.6%                   | 8.9%          |
| Moderate  | 275                       | 12.9%         | 29,623         | 15.0%         | 12.8%              | 12.2%                  | 14.5%         |
| Middle  | 1,073                     | 50.3%         | 83,656         | 42.5%         | 52.7%              | 54.6%                  | 46.6%         |
| Upper   | 653                       | 30.6%         | 69,909         | 35.5%         | 26.2%              | 26.2%                  | 29.9%         |
| Unknown   | 0                         | 0.0%          | 0              | 0.0%          | 0.0%               | 0.4%                   | 0.1%          |
| <b>TOTAL</b>  | <b>2,135</b>              | <b>100.0%</b> | <b>197,024</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | ##%           | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 1                     | 0.5%          | 150           | 1.0%          | 1.2%          | 0.0%                   | 0.0%          |
| Moderate  | 7                     | 3.3%          | 344           | 2.3%          | 12.8%         | 10.0%                  | 5.5%          |
| Middle  | 184                   | 86.0%         | 12,285        | 80.9%         | 75.7%         | 86.2%                  | 90.5%         |
| Upper   | 22                    | 10.3%         | 2,401         | 15.8%         | 10.4%         | 3.9%                   | 4.0%          |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>214</b>            | <b>100.0%</b> | <b>15,180</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | # %           | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0             | 0.0%          | 1.3%          | 0.0%                   | 0.0%          |
| Moderate  | 9                     | 4.3%          | 668           | 4.2%          | 13.5%         | 8.9%                   | 6.7%          |
| Middle  | 178                   | 85.2%         | 13,363        | 83.3%         | 75.1%         | 86.0%                  | 86.8%         |
| Upper   | 22                    | 10.5%         | 2,018         | 12.6%         | 10.2%         | 5.0%                   | 6.4%          |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>209</b>            | <b>100.0%</b> | <b>16,049</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |                |               |                                   |                     |               |
|--|------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)      | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 85         | 12.9%         | 8,131          | 7.9%          | 18.3%                             | 13.9%               | 8.6%          |
| Moderate   | 139        | 21.1%         | 17,746         | 17.3%         | 17.4%                             | 22.3%               | 18.4%         |
| Middle   | 142        | 21.5%         | 22,217         | 21.7%         | 25.2%                             | 21.5%               | 22.7%         |
| Upper  | 203        | 30.8%         | 41,878         | 40.9%         | 39.0%                             | 22.3%               | 31.5%         |
| Unknown  | 90         | 13.7%         | 12,319         | 12.0%         | 0.0%                              | 20.0%               | 18.8%         |
| <b>TOTAL</b>   | <b>659</b> | <b>100.0%</b> | <b>102,291</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                                   |                     |               |
| Low  | 26         | 6.7%          | 2,349          | 3.5%          | 18.3%                             | 8.7%                | 4.5%          |
| Moderate   | 68         | 17.6%         | 8,068          | 11.9%         | 17.4%                             | 17.0%               | 12.2%         |
| Middle   | 94         | 24.3%         | 15,212         | 22.5%         | 25.2%                             | 22.1%               | 20.2%         |
| Upper  | 154        | 39.8%         | 33,609         | 49.7%         | 39.0%                             | 29.7%               | 37.0%         |
| Unknown  | 45         | 11.6%         | 8,351          | 12.4%         | 0.0%                              | 22.5%               | 26.1%         |
| <b>TOTAL</b>   | <b>387</b> | <b>100.0%</b> | <b>67,589</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 18.3%                             | 14.8%               | 11.3%         |
| Moderate   | 9          | 36.0%         | 439            | 36.0%         | 17.4%                             | 27.8%               | 25.0%         |
| Middle   | 3          | 12.0%         | 187            | 15.4%         | 25.2%                             | 17.6%               | 19.4%         |
| Upper  | 6          | 24.0%         | 445            | 36.5%         | 39.0%                             | 26.9%               | 37.3%         |
| Unknown  | 7          | 28.0%         | 147            | 12.1%         | 0.0%                              | 13.0%               | 7.0%          |
| <b>TOTAL</b>   | <b>25</b>  | <b>100.0%</b> | <b>1,218</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 18.3%                             | 0.0%                | 0.0%          |
| Moderate   | 1          | 10.0%         | 258            | 4.2%          | 17.4%                             | 4.4%                | 1.7%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 25.2%                             | 0.0%                | 0.0%          |
| Upper  | 1          | 10.0%         | 314            | 5.1%          | 39.0%                             | 6.7%                | 6.7%          |
| Unknown  | 8          | 80.0%         | 5,535          | 90.6%         | 0.0%                              | 88.9%               | 91.6%         |
| <b>TOTAL</b>   | <b>10</b>  | <b>100.0%</b> | <b>6,107</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 18.3%                             | 6.3%                | 2.2%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 17.4%                             | 6.3%                | 4.0%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 25.2%                             | 37.5%               | 38.8%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 39.0%                             | 50.0%               | 54.9%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Other Purpose Closed/Exempt |              |               |                |               |               |               |               |
|-----------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                         | 4            | 16.7%         | 161            | 5.2%          | 18.3%         | 20.0%         | 8.7%          |
| Moderate                    | 3            | 12.5%         | 92             | 3.0%          | 17.4%         | 16.9%         | 6.9%          |
| Middle                      | 4            | 16.7%         | 725            | 23.4%         | 25.2%         | 15.4%         | 17.8%         |
| Upper                       | 12           | 50.0%         | 2,106          | 67.9%         | 39.0%         | 41.5%         | 55.6%         |
| Unknown                     | 1            | 4.2%          | 18             | 0.6%          | 0.0%          | 6.2%          | 11.0%         |
| <b>TOTAL</b>                | <b>24</b>    | <b>100.0%</b> | <b>3,102</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Purpose Not Applicable      |              |               |                |               |               |               |               |
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 18.3%         | 0.0%          | 0.0%          |
| Moderate                    | 0            | 0.0%          | 0              | 0.0%          | 17.4%         | 0.0%          | 0.0%          |
| Middle                      | 0            | 0.0%          | 0              | 0.0%          | 25.2%         | 0.0%          | 0.0%          |
| Upper                       | 0            | 0.0%          | 0              | 0.0%          | 39.0%         | 2.5%          | 3.7%          |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 97.5%         | 96.3%         |
| <b>TOTAL</b>                | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans   |              |               |                |               |               |               |               |
| Low                         | 115          | 10.4%         | 10,641         | 5.9%          | 18.3%         | 12.0%         | 6.8%          |
| Moderate                    | 220          | 19.9%         | 26,603         | 14.8%         | 17.4%         | 20.1%         | 15.4%         |
| Middle                      | 243          | 22.0%         | 38,341         | 21.3%         | 25.2%         | 21.1%         | 20.8%         |
| Upper                       | 376          | 34.0%         | 78,352         | 43.5%         | 39.0%         | 24.9%         | 32.8%         |
| Unknown                     | 151          | 13.7%         | 26,370         | 14.6%         | 0.0%          | 21.8%         | 24.2%         |
| <b>TOTAL</b>                | <b>1,105</b> | <b>100.0%</b> | <b>180,307</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |              |               |                |               |                                   |                     |               |
|--|--------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans   |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #            | # %           | \$             | \$ %          |                                   | # %                 | \$ %          |
| Home Purchase Loans  |              |               |                |               |                                   |                     |               |
| Low  | 68           | 8.9%          | 6,988          | 5.2%          | 18.3%                             | 10.1%               | 6.5%          |
| Moderate   | 181          | 23.6%         | 23,900         | 17.7%         | 17.4%                             | 24.7%               | 19.6%         |
| Middle   | 168          | 21.9%         | 28,349         | 21.0%         | 25.2%                             | 22.1%               | 22.5%         |
| Upper  | 230          | 29.9%         | 56,955         | 42.2%         | 39.0%                             | 25.2%               | 35.0%         |
| Unknown  | 121          | 15.8%         | 18,918         | 14.0%         | 0.0%                              | 17.8%               | 16.4%         |
| <b>TOTAL</b>   | <b>768</b>   | <b>100.0%</b> | <b>135,111</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Refinance  |              |               |                |               |                                   |                     |               |
| Low  | 72           | 5.3%          | 6,899          | 2.8%          | 18.3%                             | 4.6%                | 2.5%          |
| Moderate   | 229          | 16.7%         | 29,000         | 11.6%         | 17.4%                             | 15.7%               | 11.1%         |
| Middle   | 313          | 22.9%         | 49,663         | 19.8%         | 25.2%                             | 21.6%               | 18.5%         |
| Upper  | 609          | 44.5%         | 135,224        | 54.0%         | 39.0%                             | 39.9%               | 49.1%         |
| Unknown  | 146          | 10.7%         | 29,687         | 11.9%         | 0.0%                              | 18.2%               | 18.9%         |
| <b>TOTAL</b>   | <b>1,369</b> | <b>100.0%</b> | <b>250,473</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Home Improvement   |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 18.3%                             | 11.1%               | 7.5%          |
| Moderate   | 1            | 5.9%          | 16             | 1.2%          | 17.4%                             | 13.6%               | 9.2%          |
| Middle   | 4            | 23.5%         | 364            | 27.7%         | 25.2%                             | 21.0%               | 14.5%         |
| Upper  | 6            | 35.3%         | 344            | 26.2%         | 39.0%                             | 34.6%               | 42.7%         |
| Unknown  | 6            | 35.3%         | 590            | 44.9%         | 0.0%                              | 19.8%               | 26.1%         |
| <b>TOTAL</b>   | <b>17</b>    | <b>100.0%</b> | <b>1,314</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Multifamily Loans  |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 18.3%                             | 2.4%                | 0.7%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 17.4%                             | 0.0%                | 0.0%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 25.2%                             | 4.8%                | 2.2%          |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 39.0%                             | 9.5%                | 5.2%          |
| Unknown  | 9            | 100.0%        | 3,358          | 100.0%        | 0.0%                              | 83.3%               | 91.8%         |
| <b>TOTAL</b>   | <b>9</b>     | <b>100.0%</b> | <b>3,358</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Other Purpose LOC           |              |               |                |               |               |               |               |
|-----------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 18.3%         | 0.0%          | 0.0%          |
| Moderate                    | 0            | 0.0%          | 0              | 0.0%          | 17.4%         | 14.3%         | 9.9%          |
| Middle                      | 0            | 0.0%          | 0              | 0.0%          | 25.2%         | 14.3%         | 6.2%          |
| Upper                       | 0            | 0.0%          | 0              | 0.0%          | 39.0%         | 71.4%         | 83.9%         |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>                | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Other Purpose Closed/Exempt |              |               |                |               |               |               |               |
| Low                         | 5            | 31.3%         | 246            | 19.3%         | 18.3%         | 14.8%         | 8.8%          |
| Moderate                    | 2            | 12.5%         | 274            | 21.5%         | 17.4%         | 11.1%         | 10.7%         |
| Middle                      | 2            | 12.5%         | 181            | 14.2%         | 25.2%         | 14.8%         | 8.5%          |
| Upper                       | 5            | 31.3%         | 298            | 23.4%         | 39.0%         | 51.9%         | 61.3%         |
| Unknown                     | 2            | 12.5%         | 273            | 21.5%         | 0.0%          | 7.4%          | 10.7%         |
| <b>TOTAL</b>                | <b>16</b>    | <b>100.0%</b> | <b>1,272</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Purpose Not Applicable      |              |               |                |               |               |               |               |
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 18.3%         | 0.0%          | 0.0%          |
| Moderate                    | 0            | 0.0%          | 0              | 0.0%          | 17.4%         | 0.0%          | 0.0%          |
| Middle                      | 0            | 0.0%          | 0              | 0.0%          | 25.2%         | 0.0%          | 0.0%          |
| Upper                       | 0            | 0.0%          | 0              | 0.0%          | 39.0%         | 0.0%          | 0.0%          |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 100.0%        | 100.0%        |
| <b>TOTAL</b>                | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans   |              |               |                |               |               |               |               |
| Low                         | 145          | 6.7%          | 14,133         | 3.6%          | 18.3%         | 6.7%          | 3.9%          |
| Moderate                    | 413          | 19.0%         | 53,190         | 13.6%         | 17.4%         | 18.7%         | 13.9%         |
| Middle                      | 487          | 22.3%         | 78,557         | 20.1%         | 25.2%         | 21.3%         | 19.5%         |
| Upper                       | 850          | 39.0%         | 192,821        | 49.2%         | 39.0%         | 33.7%         | 42.8%         |
| Unknown                     | 284          | 13.0%         | 52,826         | 13.5%         | 0.0%          | 19.5%         | 19.8%         |
| <b>TOTAL</b>                | <b>2,179</b> | <b>100.0%</b> | <b>391,528</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |             |               |               |                |               |               |                          |
|---|------------------------------|-------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count       |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank        |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #           | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 822         | 70.0%         | 50.1%         | 55,468         | 52.9%         | 40.1%         | 89.1%                    |
|   | Over \$1 Million/<br>Unknown | 352         | 30.0%         | 49.9%         | 49,343         | 47.1%         | 59.9%         | 10.9%                    |
|   | <b>TOTAL</b>                 | <b>1174</b> | <b>100.0%</b> | <b>100.0%</b> | <b>104,811</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 923         | 78.6%         | 86.8%         | 31,834         | 30.4%         | 26.6%         |                          |
|   | \$100,001–\$250,000          | 165         | 14.1%         | 7.6%          | 28,619         | 27.3%         | 22.2%         |                          |
|   | \$250,001–\$1 Million        | 86          | 7.3%          | 5.6%          | 44,358         | 42.3%         | 51.2%         |                          |
|   | Over \$1 Million             | 0           | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>1174</b> | <b>100.0%</b> | <b>100.0%</b> | <b>104,811</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 685         | 83.3%         |               | 23,567         | 42.5%         |               |                          |
|   | \$100,001–\$250,000          | 104         | 12.7%         |               | 17,831         | 32.1%         |               |                          |
|   | \$250,001–\$1 Million        | 33          | 4.0%          |               | 14,070         | 25.4%         |               |                          |
|   | Over \$1 Million             | 0           | 0.0%          |               | 0              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>822</b>  | <b>100.0%</b> |               | <b>55,468</b>  | <b>100.0%</b> |               |                          |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |             |               |               |                |               |               |                     |
|---|------------------------------|-------------|---------------|---------------|----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size  |                              | Count       |               |               | Dollars        |               |               | Total<br>Businesses |
|   |                              | Bank        |               | Aggregate     | Bank           |               | Aggregate     |                     |
|   |                              | #           | %             | %             | \$ (000s)      | \$ %          | \$ %          |                     |
| Business<br>Revenue   | \$1 Million or Less          | 863         | 40.4%         | 42.3%         | 80,663         | 40.9%         | 35.9%         | 89.1%               |
|   | Over \$1 Million/<br>Unknown | 1272        | 59.6%         | 57.7%         | 116,361        | 59.1%         | 64.1%         | 10.9%               |
|   | <b>TOTAL</b>                 | <b>2135</b> | <b>100.0%</b> | <b>100.0%</b> | <b>197,024</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>       |
| Loan Size   | \$100,000 or Less            | 1622        | 76.0%         | 82.1%         | 49,828         | 25.3%         | 24.6%         |                     |
|   | \$100,001–\$250,000          | 319         | 14.9%         | 9.8%          | 51,227         | 26.0%         | 21.2%         |                     |
|   | \$250,001–\$1 Million        | 194         | 9.1%          | 8.1%          | 95,969         | 48.7%         | 54.2%         |                     |
|   | Over \$1 Million             | 0           | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                     |
|   | <b>TOTAL</b>                 | <b>2135</b> | <b>100.0%</b> | <b>100.0%</b> | <b>197,024</b> | <b>100.0%</b> | <b>100.0%</b> |                     |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 625         | 72.4%         |               | 22,325         | 27.7%         |               |                     |
|   | \$100,001–\$250,000          | 168         | 19.5%         |               | 26,760         | 33.2%         |               |                     |
|   | \$250,001–\$1 Million        | 70          | 8.1%          |               | 31,578         | 39.1%         |               |                     |
|   | Over \$1 Million             | 0           | 0.0%          |               | 0              | 0.0%          |               |                     |
|   | <b>TOTAL</b>                 | <b>863</b>  | <b>100.0%</b> |               | <b>80,663</b>  | <b>100.0%</b> |               |                     |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms         |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |               |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 193        | 90.2%         | 76.4%         | 14,189        | 93.5%         | 81.2%         | 98.8%         |
|   | Over \$1 Million/<br>Unknown | 21         | 9.8%          | 23.6%         | 991           | 6.5%          | 18.8%         | 1.2%          |
|   | <b>TOTAL</b>                 | <b>214</b> | <b>100.0%</b> | <b>100.0%</b> | <b>15,180</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 171        | 79.9%         | 80.3%         | 6,144         | 40.5%         | 34.9%         |               |
|   | \$100,001–\$250,000          | 34         | 15.9%         | 12.2%         | 5,788         | 38.1%         | 27.7%         |               |
|   | \$250,001–\$500,000          | 9          | 4.2%          | 7.5%          | 3,248         | 21.4%         | 37.4%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>214</b> | <b>100.0%</b> | <b>100.0%</b> | <b>15,180</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 152        | 78.8%         |               | 5,498         | 38.7%         |               |               |
|   | \$100,001–\$250,000          | 32         | 16.6%         |               | 5,443         | 38.4%         |               |               |
|   | \$250,001–\$1 Million        | 9          | 4.7%          |               | 3,248         | 22.9%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>193</b> | <b>100.0%</b> |               | <b>14,189</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms         |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |               |
|   |                              | #          | %             | %             | \$ (000s)     | \$ %          | \$ %          | %             |
| Farm Revenue  | \$1 Million or Less          | 168        | 80.4%         | 72.9%         | 14,080        | 87.7%         | 81.3%         | 98.7%         |
|   | Over \$1 Million/<br>Unknown | 41         | 19.6%         | 27.1%         | 1,969         | 12.3%         | 18.7%         | 1.3%          |
|   | <b>TOTAL</b>                 | <b>209</b> | <b>100.0%</b> | <b>100.0%</b> | <b>16,049</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 159        | 76.1%         | 71.3%         | 5,592         | 34.8%         | 26.1%         |               |
|   | \$100,001–\$250,000          | 38         | 18.2%         | 17.9%         | 6,023         | 37.5%         | 30.9%         |               |
|   | \$250,001–\$500,000          | 12         | 5.7%          | 10.8%         | 4,434         | 27.6%         | 43.0%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>209</b> | <b>100.0%</b> | <b>100.0%</b> | <b>16,049</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 125        | 74.4%         |               | 4,551         | 32.3%         |               |               |
|   | \$100,001–\$250,000          | 31         | 18.5%         |               | 5,095         | 36.2%         |               |               |
|   | \$250,001–\$1 Million        | 12         | 7.1%          |               | 4,434         | 31.5%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>168</b> | <b>100.0%</b> |               | <b>14,080</b> | <b>100.0%</b> |               |               |

## Springfield

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 6          | 1.6%          | 434           | 0.7%          | 2.2%                          | 2.4%                | 1.1%          |
| Moderate   | 49         | 13.3%         | 4,607         | 7.3%          | 14.7%                         | 12.8%               | 8.0%          |
| Middle   | 229        | 62.1%         | 37,692        | 59.5%         | 62.4%                         | 65.7%               | 65.7%         |
| Upper  | 85         | 23.0%         | 20,567        | 32.5%         | 20.7%                         | 19.2%               | 25.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>369</b> | <b>100.0%</b> | <b>63,300</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 6          | 3.0%          | 602           | 1.7%          | 2.2%                          | 1.4%                | 0.7%          |
| Moderate   | 10         | 5.1%          | 1,373         | 3.8%          | 14.7%                         | 9.5%                | 5.7%          |
| Middle   | 117        | 59.1%         | 18,597        | 51.2%         | 62.4%                         | 65.1%               | 62.7%         |
| Upper  | 65         | 32.8%         | 15,720        | 43.3%         | 20.7%                         | 23.9%               | 30.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>198</b> | <b>100.0%</b> | <b>36,292</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 2.2%                          | 2.3%                | 4.0%          |
| Moderate   | 1          | 10.0%         | 28            | 3.3%          | 14.7%                         | 13.1%               | 8.8%          |
| Middle   | 6          | 60.0%         | 422           | 49.9%         | 62.4%                         | 63.8%               | 59.4%         |
| Upper  | 3          | 30.0%         | 396           | 46.8%         | 20.7%                         | 20.8%               | 27.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>10</b>  | <b>100.0%</b> | <b>846</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 8.2%                          | 12.7%               | 8.2%          |
| Moderate   | 1          | 20.0%         | 350           | 11.2%         | 40.0%                         | 25.3%               | 37.9%         |
| Middle   | 3          | 60.0%         | 2,526         | 80.9%         | 42.4%                         | 52.0%               | 40.0%         |
| Upper  | 1          | 20.0%         | 248           | 7.9%          | 7.2%                          | 8.0%                | 10.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 2.3%                          | 2.0%                | 4.0%          |
| <b>TOTAL</b>   | <b>5</b>   | <b>100.0%</b> | <b>3,124</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 2.2%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.7%                         | 6.7%                | 4.1%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 62.4%                         | 60.2%               | 55.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 20.7%                         | 33.1%               | 40.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 2.2%                          | 1.5%                | 1.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.7%                         | 14.6%               | 11.7%         |
| Middle   | 2          | 66.7%         | 105           | 39.6%         | 62.4%                         | 63.2%               | 60.3%         |
| Upper  | 1          | 33.3%         | 160           | 60.4%         | 20.7%                         | 20.7%               | 26.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>265</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 2.2%                          | 4.7%                | 3.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.7%                         | 17.6%               | 12.3%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 62.4%                         | 66.1%               | 71.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 20.7%                         | 11.6%               | 13.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

| Total Home Mortgage Loans |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 12         | 2.1%          | 1,036          | 1.0%          | 2.2%          | 2.1%          | 1.4%          |
| Moderate                  | 61         | 10.4%         | 6,358          | 6.1%          | 14.7%         | 11.8%         | 9.1%          |
| Middle                    | 357        | 61.0%         | 59,342         | 57.2%         | 62.4%         | 65.2%         | 63.1%         |
| Upper                     | 155        | 26.5%         | 37,091         | 35.7%         | 20.7%         | 20.8%         | 26.2%         |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.2%          |
| <b>TOTAL</b>              | <b>585</b> | <b>100.0%</b> | <b>103,827</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |                |               |                               |                     |               |
|--|------------|---------------|----------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | %             | \$ (000s)      | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 10         | 2.2%          | 971            | 1.1%          | 2.2%                          | 2.3%                | 1.2%          |
| Moderate   | 44         | 9.6%          | 4,847          | 5.3%          | 14.7%                         | 11.9%               | 7.8%          |
| Middle   | 297        | 65.1%         | 56,494         | 61.2%         | 62.4%                         | 66.1%               | 65.4%         |
| Upper  | 105        | 23.0%         | 29,925         | 32.4%         | 20.7%                         | 19.7%               | 25.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>456</b> | <b>100.0%</b> | <b>92,237</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                               |                     |               |
| Low  | 4          | 0.7%          | 405            | 0.4%          | 2.2%                          | 0.8%                | 0.4%          |
| Moderate   | 45         | 8.2%          | 5,270          | 4.8%          | 14.7%                         | 7.7%                | 4.8%          |
| Middle   | 335        | 60.9%         | 60,841         | 55.6%         | 62.4%                         | 64.1%               | 60.9%         |
| Upper  | 166        | 30.2%         | 42,886         | 39.2%         | 20.7%                         | 27.4%               | 33.8%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>550</b> | <b>100.0%</b> | <b>109,402</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                               |                     |               |
| Low  | 1          | 33.3%         | 38             | 12.6%         | 2.2%                          | 3.5%                | 1.9%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 14.7%                         | 13.5%               | 11.5%         |
| Middle   | 2          | 66.7%         | 263            | 87.4%         | 62.4%                         | 55.8%               | 49.9%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 20.7%                         | 27.2%               | 36.7%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>301</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 4          | 22.2%         | 2,066          | 12.9%         | 8.2%                          | 12.7%               | 11.8%         |
| Moderate   | 5          | 27.8%         | 2,604          | 16.3%         | 40.0%                         | 23.9%               | 18.2%         |
| Middle   | 5          | 27.8%         | 3,359          | 21.1%         | 42.4%                         | 51.4%               | 56.1%         |
| Upper  | 3          | 16.7%         | 6,548          | 41.0%         | 7.2%                          | 9.2%                | 13.3%         |
| Unknown  | 1          | 5.6%          | 1,378          | 8.6%          | 2.3%                          | 2.8%                | 0.6%          |
| <b>TOTAL</b>   | <b>18</b>  | <b>100.0%</b> | <b>15,955</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 2.2%                          | 0.8%                | 0.6%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 14.7%                         | 5.4%                | 4.3%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 62.4%                         | 66.9%               | 58.3%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 20.7%                         | 26.9%               | 36.8%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 2.2%                          | 0.7%                | 0.4%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 14.7%                         | 8.3%                | 5.0%          |
| Middle   | 1          | 50.0%         | 201            | 57.3%         | 62.4%                         | 62.9%               | 58.4%         |
| Upper  | 1          | 50.0%         | 150            | 42.7%         | 20.7%                         | 28.1%               | 36.2%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>351</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Purpose Not Applicable    |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 2.2%          | 3.3%          | 2.2%          |
| Moderate                  | 0            | 0.0%          | 0              | 0.0%          | 14.7%         | 13.8%         | 8.5%          |
| Middle                    | 0            | 0.0%          | 0              | 0.0%          | 62.4%         | 70.5%         | 74.4%         |
| Upper                     | 0            | 0.0%          | 0              | 0.0%          | 20.7%         | 12.4%         | 14.9%         |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |              |               |                |               |               |               |               |
| Low                       | 19           | 1.8%          | 3,480          | 1.6%          | 2.2%          | 1.7%          | 2.0%          |
| Moderate                  | 94           | 9.1%          | 12,721         | 5.8%          | 14.7%         | 10.0%         | 7.6%          |
| Middle                    | 640          | 62.2%         | 121,158        | 55.5%         | 62.4%         | 64.8%         | 62.3%         |
| Upper                     | 275          | 26.7%         | 79,509         | 36.4%         | 20.7%         | 23.4%         | 28.1%         |
| Unknown                   | 1            | 0.1%          | 1,378          | 0.6%          | 0.0%          | 0.0%          | 0.1%          |
| <b>TOTAL</b>              | <b>1,029</b> | <b>100.0%</b> | <b>218,246</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |               |               |                 |                        |               |
|---|---------------------------|---------------|---------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)     | \$ %          |                 | %                      | \$ %          |
| Low   | 27                        | 3.2%          | 4,985         | 5.5%          | 2.2%            | 1.6%                   | 2.0%          |
| Moderate  | 214                       | 25.1%         | 29,374        | 32.3%         | 24.4%           | 23.6%                  | 32.5%         |
| Middle  | 459                       | 53.9%         | 43,251        | 47.6%         | 56.8%           | 55.3%                  | 47.7%         |
| Upper   | 148                       | 17.4%         | 13,054        | 14.4%         | 16.3%           | 18.2%                  | 17.4%         |
| Unknown   | 4                         | 0.5%          | 216           | 0.2%          | 0.3%            | 1.4%                   | 0.4%          |
| <b>TOTAL</b>  | <b>852</b>                | <b>100.0%</b> | <b>90,880</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                    |                        |               |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)      | \$ %          |                    | %                      | \$ %          |
| Low   | 46                        | 2.4%          | 6,024          | 3.7%          | 2.2%               | 1.8%                   | 2.0%          |
| Moderate  | 485                       | 25.5%         | 54,942         | 33.6%         | 24.5%              | 23.6%                  | 32.1%         |
| Middle  | 1,044                     | 54.9%         | 76,370         | 46.7%         | 56.5%              | 57.1%                  | 49.7%         |
| Upper   | 317                       | 16.7%         | 25,200         | 15.4%         | 16.5%              | 17.0%                  | 15.9%         |
| Unknown   | 10                        | 0.5%          | 1,139          | 0.7%          | 0.3%               | 0.5%                   | 0.3%          |
| <b>TOTAL</b>  | <b>1,902</b>              | <b>100.0%</b> | <b>163,675</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %             | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0             | 0.0%          | 0.4%          | 0.2%                   | 0.0%          |
| Moderate  | 38                    | 16.7%         | 2,723         | 14.6%         | 16.4%         | 17.2%                  | 14.8%         |
| Middle  | 182                   | 79.8%         | 14,722        | 78.7%         | 73.6%         | 77.6%                  | 76.1%         |
| Upper   | 8                     | 3.5%          | 1,251         | 6.7%          | 9.7%          | 4.9%                   | 8.9%          |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.1%                   | 0.1%          |
| <b>TOTAL</b>  | <b>228</b>            | <b>100.0%</b> | <b>18,696</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | # %           | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 2                     | 0.9%          | 46            | 0.3%          | 0.4%          | 0.2%                   | 0.1%          |
| Moderate  | 34                    | 15.2%         | 2,235         | 13.4%         | 14.1%         | 15.8%                  | 14.9%         |
| Middle  | 178                   | 79.8%         | 13,445        | 80.6%         | 75.4%         | 79.6%                  | 78.1%         |
| Upper   | 9                     | 4.0%          | 951           | 5.7%          | 10.1%         | 4.3%                   | 6.8%          |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.1%                   | 0.1%          |
| <b>TOTAL</b>  | <b>223</b>            | <b>100.0%</b> | <b>16,677</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 31         | 8.4%          | 2,976         | 4.7%          | 20.3%                             | 6.4%                | 3.5%          |
| Moderate   | 80         | 21.7%         | 9,157         | 14.5%         | 18.7%                             | 19.6%               | 14.5%         |
| Middle   | 79         | 21.4%         | 11,290        | 17.8%         | 21.1%                             | 21.7%               | 20.3%         |
| Upper  | 142        | 38.5%         | 35,175        | 55.6%         | 39.8%                             | 32.5%               | 43.0%         |
| Unknown  | 37         | 10.0%         | 4,702         | 7.4%          | 0.0%                              | 19.7%               | 18.6%         |
| <b>TOTAL</b>   | <b>369</b> | <b>100.0%</b> | <b>63,300</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 8          | 4.0%          | 565           | 1.6%          | 20.3%                             | 6.2%                | 3.1%          |
| Moderate   | 32         | 16.2%         | 3,541         | 9.8%          | 18.7%                             | 14.2%               | 8.8%          |
| Middle   | 35         | 17.7%         | 4,187         | 11.5%         | 21.1%                             | 17.8%               | 14.0%         |
| Upper  | 99         | 50.0%         | 23,511        | 64.8%         | 39.8%                             | 39.0%               | 49.4%         |
| Unknown  | 24         | 12.1%         | 4,488         | 12.4%         | 0.0%                              | 22.8%               | 24.6%         |
| <b>TOTAL</b>   | <b>198</b> | <b>100.0%</b> | <b>36,292</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 7.2%                | 3.9%          |
| Moderate   | 4          | 40.0%         | 349           | 41.3%         | 18.7%                             | 14.9%               | 11.7%         |
| Middle   | 1          | 10.0%         | 28            | 3.3%          | 21.1%                             | 23.2%               | 19.5%         |
| Upper  | 3          | 30.0%         | 415           | 49.1%         | 39.8%                             | 47.2%               | 59.8%         |
| Unknown  | 2          | 20.0%         | 54            | 6.4%          | 0.0%                              | 7.6%                | 5.1%          |
| <b>TOTAL</b>   | <b>10</b>  | <b>100.0%</b> | <b>846</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 0.7%                | 0.1%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 1.3%                | 0.2%          |
| Upper  | 2          | 40.0%         | 325           | 10.4%         | 39.8%                             | 9.3%                | 1.9%          |
| Unknown  | 3          | 60.0%         | 2,799         | 89.6%         | 0.0%                              | 88.7%               | 97.8%         |
| <b>TOTAL</b>   | <b>5</b>   | <b>100.0%</b> | <b>3,124</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 4.9%                | 2.2%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 12.7%               | 9.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 22.2%               | 20.7%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 39.8%                             | 54.0%               | 63.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 6.2%                | 4.7%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 1          | 33.3%         | 68            | 25.7%         | 20.3%                             | 5.4%                | 3.4%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 16.1%               | 13.8%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 26.1%               | 19.5%         |
| Upper  | 2          | 66.7%         | 197           | 74.3%         | 39.8%                             | 39.5%               | 47.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 13.0%               | 15.4%         |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>265</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0              | 0.0%          | 20.3%         | 0.4%          | 0.1%          |
| Moderate                  | 0          | 0.0%          | 0              | 0.0%          | 18.7%         | 0.0%          | 0.0%          |
| Middle                    | 0          | 0.0%          | 0              | 0.0%          | 21.1%         | 2.1%          | 2.3%          |
| Upper                     | 0          | 0.0%          | 0              | 0.0%          | 39.8%         | 0.0%          | 0.0%          |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.0%          | 97.4%         | 97.6%         |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |                |               |               |               |               |
| Low                       | 40         | 6.8%          | 3,609          | 3.5%          | 20.3%         | 6.2%          | 3.2%          |
| Moderate                  | 116        | 19.8%         | 13,047         | 12.6%         | 18.7%         | 17.2%         | 11.8%         |
| Middle                    | 115        | 19.7%         | 15,505         | 14.9%         | 21.1%         | 20.2%         | 17.1%         |
| Upper                     | 248        | 42.4%         | 59,623         | 57.4%         | 39.8%         | 34.8%         | 42.6%         |
| Unknown                   | 66         | 11.3%         | 12,043         | 11.6%         | 0.0%          | 21.5%         | 25.3%         |
| <b>TOTAL</b>              | <b>585</b> | <b>100.0%</b> | <b>103,827</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |                |               |                                   |                     |               |
|--|------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$             | \$ %          |                                   | # %                 | \$ %          |
| Home Purchase Loans  |            |               |                |               |                                   |                     |               |
| Low  | 29         | 6.4%          | 3,131          | 3.4%          | 20.3%                             | 7.8%                | 4.4%          |
| Moderate   | 91         | 20.0%         | 13,438         | 14.6%         | 18.7%                             | 21.2%               | 16.5%         |
| Middle   | 96         | 21.1%         | 16,870         | 18.3%         | 21.1%                             | 21.6%               | 20.8%         |
| Upper  | 186        | 40.8%         | 48,478         | 52.6%         | 39.8%                             | 30.0%               | 39.7%         |
| Unknown  | 54         | 11.8%         | 10,320         | 11.2%         | 0.0%                              | 19.4%               | 18.5%         |
| <b>TOTAL</b>   | <b>456</b> | <b>100.0%</b> | <b>92,237</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Refinance  |            |               |                |               |                                   |                     |               |
| Low  | 43         | 7.8%          | 4,016          | 3.7%          | 20.3%                             | 4.9%                | 2.4%          |
| Moderate   | 70         | 12.7%         | 9,434          | 8.6%          | 18.7%                             | 13.0%               | 8.7%          |
| Middle   | 102        | 18.5%         | 14,885         | 13.6%         | 21.1%                             | 17.9%               | 14.9%         |
| Upper  | 234        | 42.5%         | 58,663         | 53.6%         | 39.8%                             | 38.4%               | 47.7%         |
| Unknown  | 101        | 18.4%         | 22,404         | 20.5%         | 0.0%                              | 25.8%               | 26.3%         |
| <b>TOTAL</b>   | <b>550</b> | <b>100.0%</b> | <b>109,402</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Home Improvement   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 20.3%                             | 7.1%                | 4.4%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 18.7%                             | 14.8%               | 10.1%         |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 21.1%                             | 21.6%               | 22.1%         |
| Upper  | 2          | 66.7%         | 251            | 83.4%         | 39.8%                             | 49.4%               | 58.5%         |
| Unknown  | 1          | 33.3%         | 50             | 16.6%         | 0.0%                              | 7.1%                | 4.8%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>301</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Multifamily Loans  |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 18.7%                             | 0.4%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 21.1%                             | 0.4%                | 0.0%          |
| Upper  | 2          | 11.1%         | 617            | 3.9%          | 39.8%                             | 6.0%                | 1.6%          |
| Unknown  | 16         | 88.9%         | 15,338         | 96.1%         | 0.0%                              | 93.2%               | 98.4%         |
| <b>TOTAL</b>   | <b>18</b>  | <b>100.0%</b> | <b>15,955</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| Other Purpose LOC  |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 20.3%                             | 5.0%                | 1.9%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 18.7%                             | 15.0%               | 8.9%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 21.1%                             | 18.1%               | 12.2%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 39.8%                             | 49.6%               | 62.1%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 12.3%               | 15.0%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Other Purpose Closed/Exempt |              |               |                |               |               |               |               |
|-----------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 20.3%         | 6.1%          | 3.4%          |
| Moderate                    | 1            | 50.0%         | 150            | 42.7%         | 18.7%         | 18.4%         | 13.3%         |
| Middle                      | 0            | 0.0%          | 0              | 0.0%          | 21.1%         | 23.9%         | 20.4%         |
| Upper                       | 0            | 0.0%          | 0              | 0.0%          | 39.8%         | 46.7%         | 58.6%         |
| Unknown                     | 1            | 50.0%         | 201            | 57.3%         | 0.0%          | 4.8%          | 4.3%          |
| <b>TOTAL</b>                | <b>2</b>     | <b>100.0%</b> | <b>351</b>     | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Purpose Not Applicable      |              |               |                |               |               |               |               |
| Low                         | 0            | 0.0%          | 0              | 0.0%          | 20.3%         | 0.2%          | 0.1%          |
| Moderate                    | 0            | 0.0%          | 0              | 0.0%          | 18.7%         | 0.0%          | 0.0%          |
| Middle                      | 0            | 0.0%          | 0              | 0.0%          | 21.1%         | 0.0%          | 0.0%          |
| Upper                       | 0            | 0.0%          | 0              | 0.0%          | 39.8%         | 0.2%          | 0.5%          |
| Unknown                     | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 99.6%         | 99.4%         |
| <b>TOTAL</b>                | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans   |              |               |                |               |               |               |               |
| Low                         | 72           | 7.0%          | 7,147          | 3.3%          | 20.3%         | 6.1%          | 3.0%          |
| Moderate                    | 162          | 15.7%         | 23,022         | 10.5%         | 18.7%         | 16.5%         | 11.0%         |
| Middle                      | 198          | 19.2%         | 31,755         | 14.6%         | 21.1%         | 19.3%         | 15.7%         |
| Upper                       | 424          | 41.2%         | 108,009        | 49.5%         | 39.8%         | 34.1%         | 39.2%         |
| Unknown                     | 173          | 16.8%         | 48,313         | 22.1%         | 0.0%          | 24.0%         | 31.2%         |
| <b>TOTAL</b>                | <b>1,029</b> | <b>100.0%</b> | <b>218,246</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                          |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total<br>Businesses<br>% |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                          |
|   |                              | #          | %             | %             | \$ (000s)     | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 617        | 72.4%         | 47.4%         | 50,058        | 55.1%         | 39.4%         | 90.9%                    |
|   | Over \$1 Million/<br>Unknown | 235        | 27.6%         | 52.6%         | 40,822        | 44.9%         | 60.6%         |                          |
|   | <b>TOTAL</b>                 | <b>852</b> | <b>100.0%</b> | <b>100.0%</b> | <b>90,880</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size   | \$100,000 or Less            | 624        | 73.2%         | 88.4%         | 19,643        | 21.6%         | 26.9%         |                          |
|   | \$100,001–\$250,000          | 122        | 14.3%         | 6.3%          | 21,335        | 23.5%         | 20.1%         |                          |
|   | \$250,001–\$1 Million        | 106        | 12.4%         | 5.3%          | 49,902        | 54.9%         | 53.0%         |                          |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>852</b> | <b>100.0%</b> | <b>100.0%</b> | <b>90,880</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 490        | 79.4%         |               | 14,113        | 28.2%         |               |                          |
|   | \$100,001–\$250,000          | 72         | 11.7%         |               | 11,669        | 23.3%         |               |                          |
|   | \$250,001–\$1 Million        | 55         | 8.9%          |               | 24,276        | 48.5%         |               |                          |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>617</b> | <b>100.0%</b> |               | <b>50,058</b> | <b>100.0%</b> |               |                          |

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |             |               |               |                |               |               |                          |
|---|------------------------------|-------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count       |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank        |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #           | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 580         | 30.5%         | 36.2%         | 52,981         | 32.4%         | 29.0%         | 91.2%                    |
|   | Over \$1 Million/<br>Unknown | 1322        | 69.5%         | 63.8%         | 110,694        | 67.6%         | 71.0%         | 8.8%                     |
|   | <b>TOTAL</b>                 | <b>1902</b> | <b>100.0%</b> | <b>100.0%</b> | <b>163,675</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 1496        | 78.7%         | 85.6%         | 41,655         | 25.4%         | 28.1%         |                          |
|   | \$100,001–\$250,000          | 247         | 13.0%         | 8.1%          | 39,303         | 24.0%         | 21.1%         |                          |
|   | \$250,001–\$1 Million        | 159         | 8.4%          | 6.3%          | 82,717         | 50.5%         | 50.8%         |                          |
|   | Over \$1 Million             | 0           | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>1902</b> | <b>100.0%</b> | <b>100.0%</b> | <b>163,675</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 451         | 77.8%         |               | 13,613         | 25.7%         |               |                          |
|   | \$100,001–\$250,000          | 67          | 11.6%         |               | 10,387         | 19.6%         |               |                          |
|   | \$250,001–\$1 Million        | 62          | 10.7%         |               | 28,981         | 54.7%         |               |                          |
|   | Over \$1 Million             | 0           | 0.0%          |               | 0              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>580</b>  | <b>100.0%</b> |               | <b>52,981</b>  | <b>100.0%</b> |               |                          |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms<br>%    |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |               |
|   |                              | #          | %             | %             | \$ (000s)     | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 216        | 94.7%         | 80.2%         | 16,705        | 89.4%         | 88.6%         | 98.9%         |
|   | Over \$1 Million/<br>Unknown | 12         | 5.3%          | 19.8%         | 1,991         | 10.6%         | 11.4%         | 1.1%          |
|   | <b>TOTAL</b>                 | <b>228</b> | <b>100.0%</b> | <b>100.0%</b> | <b>18,696</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 170        | 74.6%         | 82.8%         | 6,329         | 33.9%         | 40.7%         |               |
|   | \$100,001–\$250,000          | 45         | 19.7%         | 13.3%         | 7,494         | 40.1%         | 35.6%         |               |
|   | \$250,001–\$500,000          | 13         | 5.7%          | 3.8%          | 4,873         | 26.1%         | 23.7%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>228</b> | <b>100.0%</b> | <b>100.0%</b> | <b>18,696</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 163        | 75.5%         |               | 5,928         | 35.5%         |               |               |
|   | \$100,001–\$250,000          | 42         | 19.4%         |               | 6,904         | 41.3%         |               |               |
|   | \$250,001–\$1 Million        | 11         | 5.1%          |               | 3,873         | 23.2%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>216</b> | <b>100.0%</b> |               | <b>16,705</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms         |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     | %             |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 190        | 85.2%         | 79.3%         | 14,514        | 87.0%         | 87.2%         | 98.7%         |
|   | Over \$1 Million/<br>Unknown | 33         | 14.8%         | 20.7%         | 2,163         | 13.0%         | 12.8%         | 1.3%          |
|   | <b>TOTAL</b>                 | <b>223</b> | <b>100.0%</b> | <b>100.0%</b> | <b>16,677</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 171        | 76.7%         | 81.2%         | 6,037         | 36.2%         | 40.4%         |               |
|   | \$100,001–\$250,000          | 41         | 18.4%         | 14.8%         | 6,493         | 38.9%         | 37.0%         |               |
|   | \$250,001–\$500,000          | 11         | 4.9%          | 4.0%          | 4,147         | 24.9%         | 22.6%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>223</b> | <b>100.0%</b> | <b>100.0%</b> | <b>16,677</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 145        | 76.3%         |               | 5,366         | 37.0%         |               |               |
|   | \$100,001–\$250,000          | 36         | 18.9%         |               | 5,821         | 40.1%         |               |               |
|   | \$250,001–\$1 Million        | 9          | 4.7%          |               | 3,327         | 22.9%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>190</b> | <b>100.0%</b> |               | <b>14,514</b> | <b>100.0%</b> |               |               |

## Mid-Missouri

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |                |               |                               |                     |               |
|--|------------|---------------|----------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | ##            | \$ (000s)      | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.4%                | 0.2%          |
| Moderate   | 77         | 12.0%         | 10,014         | 8.8%          | 8.2%                          | 6.8%                | 5.4%          |
| Middle   | 323        | 50.2%         | 55,730         | 48.8%         | 61.4%                         | 55.2%               | 49.8%         |
| Upper  | 243        | 37.8%         | 48,449         | 42.4%         | 29.8%                         | 37.6%               | 44.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.1%          |
| <b>TOTAL</b>   | <b>643</b> | <b>100.0%</b> | <b>114,193</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.1%                | 0.1%          |
| Moderate   | 3          | 4.6%          | 245            | 1.9%          | 8.2%                          | 5.9%                | 4.9%          |
| Middle   | 23         | 35.4%         | 4,223          | 32.4%         | 61.4%                         | 51.7%               | 47.3%         |
| Upper  | 39         | 60.0%         | 8,547          | 65.7%         | 29.8%                         | 42.2%               | 47.7%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.1%                | 0.1%          |
| <b>TOTAL</b>   | <b>65</b>  | <b>100.0%</b> | <b>13,015</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.5%                | 0.4%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 8.2%                          | 6.9%                | 6.0%          |
| Middle   | 3          | 60.0%         | 95             | 65.5%         | 61.4%                         | 56.6%               | 60.0%         |
| Upper  | 2          | 40.0%         | 50             | 34.5%         | 29.8%                         | 36.0%               | 33.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>5</b>   | <b>100.0%</b> | <b>145</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 1.5%                          | 1.4%                | 6.1%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 4.0%                          | 5.7%                | 6.0%          |
| Middle   | 1          | 50.0%         | 1,427          | 73.0%         | 62.5%                         | 42.9%               | 57.8%         |
| Upper  | 1          | 50.0%         | 529            | 27.0%         | 32.0%                         | 50.0%               | 30.1%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>1,956</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.9%                | 0.2%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 8.2%                          | 8.3%                | 10.9%         |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 61.4%                         | 47.2%               | 47.4%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 29.8%                         | 43.5%               | 41.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 8.2%                          | 5.6%                | 4.5%          |
| Middle   | 1          | 25.0%         | 52             | 17.6%         | 61.4%                         | 57.9%               | 44.1%         |
| Upper  | 3          | 75.0%         | 244            | 82.4%         | 29.8%                         | 34.9%               | 49.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 1.6%                | 1.8%          |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>296</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 8.2%                          | 5.3%                | 3.3%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 61.4%                         | 61.8%               | 56.4%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 29.8%                         | 32.9%               | 40.2%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0              | 0.0%          | 0.6%          | 0.3%          | 0.3%          |
| Moderate                  | 80         | 11.1%         | 10,259         | 7.9%          | 8.2%          | 6.5%          | 5.2%          |
| Middle                    | 351        | 48.8%         | 61,527         | 47.5%         | 61.4%         | 54.1%         | 49.3%         |
| Upper                     | 288        | 40.1%         | 57,819         | 44.6%         | 29.8%         | 39.0%         | 45.1%         |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.0%          | 0.1%          | 0.1%          |
| <b>TOTAL</b>              | <b>719</b> | <b>100.0%</b> | <b>129,605</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |              |               |                |               |                               |                     |               |
|--|--------------|---------------|----------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans   |               |                |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #            | ##%           | \$ (000s)      | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.2%                | 0.1%          |
| Moderate   | 128          | 11.2%         | 21,786         | 9.5%          | 8.2%                          | 7.4%                | 6.1%          |
| Middle   | 605          | 53.0%         | 118,872        | 51.8%         | 61.4%                         | 52.0%               | 46.6%         |
| Upper  | 409          | 35.8%         | 88,951         | 38.7%         | 29.8%                         | 40.4%               | 47.1%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>1,142</b> | <b>100.0%</b> | <b>229,609</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.1%                | 0.0%          |
| Moderate   | 16           | 7.2%          | 2,082          | 4.5%          | 8.2%                          | 5.9%                | 5.3%          |
| Middle   | 90           | 40.5%         | 17,596         | 38.0%         | 61.4%                         | 51.8%               | 47.8%         |
| Upper  | 116          | 52.3%         | 26,631         | 57.5%         | 29.8%                         | 42.2%               | 46.8%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>222</b>   | <b>100.0%</b> | <b>46,309</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 8.2%                          | 3.8%                | 2.7%          |
| Middle   | 3            | 60.0%         | 1,294          | 86.9%         | 61.4%                         | 54.7%               | 56.9%         |
| Upper  | 2            | 40.0%         | 195            | 13.1%         | 29.8%                         | 41.5%               | 40.5%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>5</b>     | <b>100.0%</b> | <b>1,489</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 1.5%                          | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 4.0%                          | 14.9%               | 8.9%          |
| Middle   | 2            | 66.7%         | 333            | 31.2%         | 62.5%                         | 57.4%               | 76.8%         |
| Upper  | 1            | 33.3%         | 735            | 68.8%         | 32.0%                         | 27.7%               | 14.4%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>3</b>     | <b>100.0%</b> | <b>1,068</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 8.2%                          | 8.1%                | 7.0%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 61.4%                         | 56.5%               | 54.8%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 29.8%                         | 35.5%               | 38.2%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 8.2%                          | 8.5%                | 6.6%          |
| Middle   | 2            | 66.7%         | 143            | 53.4%         | 61.4%                         | 49.2%               | 41.2%         |
| Upper  | 1            | 33.3%         | 125            | 46.6%         | 29.8%                         | 42.4%               | 52.2%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>3</b>     | <b>100.0%</b> | <b>268</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |              |               |                |               |                               |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 0.6%                          | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 8.2%                          | 3.4%                | 2.2%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 61.4%                         | 60.8%               | 59.0%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 29.8%                         | 35.8%               | 38.9%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Total Home Mortgage Loans |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 0.6%          | 0.1%          | 0.1%          |
| Moderate                  | 144          | 10.5%         | 23,868         | 8.6%          | 8.2%          | 6.6%          | 5.7%          |
| Middle                    | 702          | 51.1%         | 138,238        | 49.6%         | 61.4%         | 52.1%         | 47.9%         |
| Upper                     | 529          | 38.5%         | 116,637        | 41.8%         | 29.8%         | 41.2%         | 46.3%         |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>1,375</b> | <b>100.0%</b> | <b>278,743</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                 |                        |               |
|---|---------------------------|---------------|----------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | #%            | \$ (000s)      | \$ %          |                 | %                      | \$ %          |
| Low   | 0                         | 0.0%          | 0              | 0.0%          | 0.6%            | 0.6%                   | 0.4%          |
| Moderate  | 205                       | 15.6%         | 18,403         | 16.3%         | 11.7%           | 9.4%                   | 10.0%         |
| Middle  | 788                       | 60.1%         | 69,966         | 61.9%         | 61.8%           | 59.3%                  | 60.5%         |
| Upper   | 318                       | 24.3%         | 24,715         | 21.9%         | 25.9%           | 28.3%                  | 28.3%         |
| Unknown   | 0                         | 0.0%          | 0              | 0.0%          | 0.0%            | 2.5%                   | 0.8%          |
| <b>TOTAL</b>  | <b>1,311</b>              | <b>100.0%</b> | <b>113,084</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                    |                        |               |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | #%            | \$ (000s)      | \$ %          |                    | %                      | \$ %          |
| Low   | 18                        | 0.6%          | 1,303          | 0.6%          | 0.5%               | 0.5%                   | 0.2%          |
| Moderate  | 346                       | 11.4%         | 29,557         | 13.0%         | 11.8%              | 9.7%                   | 10.3%         |
| Middle  | 1,942                     | 64.1%         | 145,876        | 64.0%         | 61.8%              | 60.5%                  | 61.6%         |
| Upper   | 723                       | 23.9%         | 51,073         | 22.4%         | 25.8%              | 28.4%                  | 27.5%         |
| Unknown   | 0                         | 0.0%          | 0              | 0.0%          | 0.0%               | 0.9%                   | 0.3%          |
| <b>TOTAL</b>  | <b>3,029</b>              | <b>100.0%</b> | <b>227,809</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | # %           | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| Moderate  | 6                     | 1.5%          | 87            | 0.4%          | 2.6%          | 0.4%                   | 0.4%          |
| Middle  | 237                   | 59.7%         | 13,465        | 66.7%         | 71.8%         | 67.3%                  | 67.7%         |
| Upper   | 154                   | 38.8%         | 6,626         | 32.8%         | 25.6%         | 31.4%                  | 31.8%         |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.9%                   | 0.1%          |
| <b>TOTAL</b>  | <b>397</b>            | <b>100.0%</b> | <b>20,178</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | # %           | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 1                     | 0.1%          | 6             | 0.0%          | 0.0%          | 0.1%                   | 0.0%          |
| Moderate  | 9                     | 1.0%          | 341           | 0.5%          | 2.7%          | 0.5%                   | 0.1%          |
| Middle  | 619                   | 67.4%         | 44,516        | 69.1%         | 73.2%         | 65.6%                  | 69.4%         |
| Upper   | 289                   | 31.5%         | 19,595        | 30.4%         | 24.1%         | 33.8%                  | 30.5%         |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>918</b>            | <b>100.0%</b> | <b>64,458</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |                |               |                                   |                     |               |
|--|------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)      | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 27         | 4.2%          | 2,177          | 1.9%          | 18.2%                             | 3.1%                | 1.4%          |
| Moderate   | 82         | 12.8%         | 7,956          | 7.0%          | 16.8%                             | 12.0%               | 7.0%          |
| Middle   | 126        | 19.6%         | 16,847         | 14.8%         | 20.2%                             | 18.4%               | 15.2%         |
| Upper  | 387        | 60.2%         | 84,086         | 73.6%         | 44.9%                             | 49.9%               | 60.2%         |
| Unknown  | 21         | 3.3%          | 3,127          | 2.7%          | 0.0%                              | 16.6%               | 16.3%         |
| <b>TOTAL</b>   | <b>643</b> | <b>100.0%</b> | <b>114,193</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                                   |                     |               |
| Low  | 1          | 1.5%          | 56             | 0.4%          | 18.2%                             | 4.0%                | 1.8%          |
| Moderate   | 9          | 13.8%         | 922            | 7.1%          | 16.8%                             | 7.6%                | 4.2%          |
| Middle   | 6          | 9.2%          | 1,065          | 8.2%          | 20.2%                             | 12.9%               | 8.6%          |
| Upper  | 42         | 64.6%         | 9,397          | 72.2%         | 44.9%                             | 53.3%               | 61.5%         |
| Unknown  | 7          | 10.8%         | 1,575          | 12.1%         | 0.0%                              | 22.2%               | 24.0%         |
| <b>TOTAL</b>   | <b>65</b>  | <b>100.0%</b> | <b>13,015</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                                   |                     |               |
| Low  | 1          | 20.0%         | 15             | 10.3%         | 18.2%                             | 7.9%                | 4.6%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.8%                             | 9.0%                | 7.4%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.2%                             | 20.6%               | 16.8%         |
| Upper  | 4          | 80.0%         | 130            | 89.7%         | 44.9%                             | 55.0%               | 59.7%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 7.4%                | 11.5%         |
| <b>TOTAL</b>   | <b>5</b>   | <b>100.0%</b> | <b>145</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 18.2%                             | 1.4%                | 2.6%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.8%                             | 1.4%                | 0.3%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.2%                             | 0.0%                | 0.0%          |
| Upper  | 2          | 100.0%        | 1,956          | 100.0%        | 44.9%                             | 47.1%               | 19.3%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 50.0%               | 77.7%         |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>1,956</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 18.2%                             | 2.8%                | 1.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.8%                             | 11.1%               | 8.0%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.2%                             | 21.3%               | 17.1%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 44.9%                             | 61.1%               | 67.3%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 3.7%                | 6.6%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |                |               |                                   |                     |               |
| Low  | 1          | 25.0%         | 52             | 17.6%         | 18.2%                             | 4.8%                | 2.6%          |
| Moderate   | 2          | 50.0%         | 144            | 48.6%         | 16.8%                             | 13.5%               | 8.8%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.2%                             | 15.1%               | 7.2%          |
| Upper  | 1          | 25.0%         | 100            | 33.8%         | 44.9%                             | 57.1%               | 64.0%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 9.5%                | 17.4%         |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>296</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 18.2%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.8%                             | 1.3%                | 1.2%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.2%                             | 1.3%                | 0.7%          |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 44.9%                             | 2.6%                | 8.7%          |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 94.7%               | 89.3%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 30         | 4.2%          | 2,300          | 1.8%          | 18.2%         | 3.5%          | 1.6%          |
| Moderate                  | 93         | 12.9%         | 9,022          | 7.0%          | 16.8%         | 10.4%         | 5.9%          |
| Middle                    | 132        | 18.4%         | 17,912         | 13.8%         | 20.2%         | 16.4%         | 12.4%         |
| Upper                     | 436        | 60.6%         | 95,669         | 73.8%         | 44.9%         | 50.8%         | 59.3%         |
| Unknown                   | 28         | 3.9%          | 4,702          | 3.6%          | 0.0%          | 18.8%         | 20.8%         |
| <b>TOTAL</b>              | <b>719</b> | <b>100.0%</b> | <b>129,605</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |              |               |                |               |                                   |                     |               |
|--|--------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans   |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #            | # %           | \$             | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |              |               |                |               |                                   |                     |               |
| Low  | 47           | 4.1%          | 4,707          | 2.0%          | 18.2%                             | 3.1%                | 1.3%          |
| Moderate   | 107          | 9.4%          | 11,887         | 5.2%          | 16.8%                             | 11.9%               | 7.0%          |
| Middle   | 183          | 16.0%         | 27,590         | 12.0%         | 20.2%                             | 16.3%               | 12.9%         |
| Upper  | 778          | 68.1%         | 179,225        | 78.1%         | 44.9%                             | 53.9%               | 64.4%         |
| Unknown  | 27           | 2.4%          | 6,201          | 2.7%          | 0.0%                              | 14.7%               | 14.4%         |
| <b>TOTAL</b>   | <b>1,142</b> | <b>100.0%</b> | <b>229,609</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |              |               |                |               |                                   |                     |               |
| Low  | 2            | 0.9%          | 74             | 0.2%          | 18.2%                             | 1.8%                | 0.8%          |
| Moderate   | 17           | 7.7%          | 2,053          | 4.4%          | 16.8%                             | 6.5%                | 3.7%          |
| Middle   | 23           | 10.4%         | 3,177          | 6.9%          | 20.2%                             | 12.0%               | 8.5%          |
| Upper  | 150          | 67.6%         | 31,881         | 68.8%         | 44.9%                             | 54.3%               | 60.3%         |
| Unknown  | 30           | 13.5%         | 9,124          | 19.7%         | 0.0%                              | 25.3%               | 26.8%         |
| <b>TOTAL</b>   | <b>222</b>   | <b>100.0%</b> | <b>46,309</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 18.2%                             | 3.8%                | 3.2%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 16.8%                             | 13.2%               | 7.1%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 20.2%                             | 17.6%               | 11.0%         |
| Upper  | 1            | 20.0%         | 1,200          | 80.6%         | 44.9%                             | 54.7%               | 68.1%         |
| Unknown  | 4            | 80.0%         | 289            | 19.4%         | 0.0%                              | 10.7%               | 10.6%         |
| <b>TOTAL</b>   | <b>5</b>     | <b>100.0%</b> | <b>1,489</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 18.2%                             | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 16.8%                             | 0.0%                | 0.0%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 20.2%                             | 2.1%                | 0.1%          |
| Upper  | 1            | 33.3%         | 148            | 13.9%         | 44.9%                             | 31.9%               | 13.0%         |
| Unknown  | 2            | 66.7%         | 920            | 86.1%         | 0.0%                              | 66.0%               | 86.9%         |
| <b>TOTAL</b>   | <b>3</b>     | <b>100.0%</b> | <b>1,068</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 18.2%                             | 1.6%                | 1.2%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 16.8%                             | 9.7%                | 6.8%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 20.2%                             | 17.7%               | 13.3%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 44.9%                             | 67.7%               | 76.6%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                              | 3.2%                | 2.0%          |
| <b>TOTAL</b>   | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 18.2%                             | 0.8%                | 0.7%          |
| Moderate   | 1            | 33.3%         | 43             | 16.0%         | 16.8%                             | 11.0%               | 6.1%          |
| Middle   | 2            | 66.7%         | 225            | 84.0%         | 20.2%                             | 21.2%               | 12.5%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 44.9%                             | 62.7%               | 73.4%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                              | 4.2%                | 7.3%          |
| <b>TOTAL</b>   | <b>3</b>     | <b>100.0%</b> | <b>268</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 18.2%         | 0.6%          | 0.1%          |
| Moderate                  | 0            | 0.0%          | 0              | 0.0%          | 16.8%         | 0.0%          | 0.0%          |
| Middle                    | 0            | 0.0%          | 0              | 0.0%          | 20.2%         | 0.0%          | 0.0%          |
| Upper                     | 0            | 0.0%          | 0              | 0.0%          | 44.9%         | 0.0%          | 0.0%          |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 99.4%         | 99.9%         |
| <b>TOTAL</b>              | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |              |               |                |               |               |               |               |
| Low                       | 49           | 3.6%          | 4,781          | 1.7%          | 18.2%         | 2.4%          | 1.0%          |
| Moderate                  | 125          | 9.1%          | 13,983         | 5.0%          | 16.8%         | 9.1%          | 5.2%          |
| Middle                    | 208          | 15.1%         | 30,992         | 11.1%         | 20.2%         | 14.0%         | 10.4%         |
| Upper                     | 930          | 67.6%         | 212,454        | 76.2%         | 44.9%         | 53.4%         | 61.0%         |
| Unknown                   | 63           | 4.6%          | 16,534         | 5.9%          | 0.0%          | 21.0%         | 22.4%         |
| <b>TOTAL</b>              | <b>1,375</b> | <b>100.0%</b> | <b>278,743</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |              |               |               |                |               |               |                          |
|---|------------------------------|--------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count        |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank         |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #            | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 1,057        | 80.6%         | 49.8%         | 78,423         | 69.3%         | 41.1%         | 91.8%                    |
|   | Over \$1 Million/<br>Unknown | 254          | 19.4%         | 50.2%         | 34,661         | 30.7%         | 58.9%         | 8.2%                     |
|   | <b>TOTAL</b>                 | <b>1,311</b> | <b>100.0%</b> | <b>100.0%</b> | <b>113,084</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 1,004        | 76.6%         | 93.6%         | 29,638         | 26.2%         | 38.0%         |                          |
|   | \$100,001–\$250,000          | 207          | 15.8%         | 3.5%          | 34,728         | 30.7%         | 16.3%         |                          |
|   | \$250,001–\$1 Million        | 100          | 7.6%          | 2.9%          | 48,718         | 43.1%         | 45.7%         |                          |
|   | Over \$1 Million             | 0            | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>1,311</b> | <b>100.0%</b> | <b>100.0%</b> | <b>113,084</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 830          | 78.5%         |               | 23,079         | 29.4%         |               |                          |
|   | \$100,001–\$250,000          | 168          | 15.9%         |               | 27,854         | 35.5%         |               |                          |
|   | \$250,001–\$1 Million        | 59           | 5.6%          |               | 27,490         | 35.1%         |               |                          |
|   | Over \$1 Million             | 0            | 0.0%          |               | 0              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>1,057</b> | <b>100.0%</b> |               | <b>78,423</b>  | <b>100.0%</b> |               |                          |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |              |               |               |                |               |               |                          |
|---|------------------------------|--------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count        |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank         |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #            | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 1,120        | 37.0%         | 43.0%         | 98,505         | 43.2%         | 38.6%         | 91.9%                    |
|   | Over \$1 Million/<br>Unknown | 1,909        | 63.0%         | 57.0%         | 129,304        | 56.8%         | 61.4%         | 8.1%                     |
|   | <b>TOTAL</b>                 | <b>3,029</b> | <b>100.0%</b> | <b>100.0%</b> | <b>227,809</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 2,431        | 80.3%         | 88.3%         | 68,783         | 30.2%         | 32.1%         |                          |
|   | \$100,001–\$250,000          | 391          | 12.9%         | 7.2%          | 62,213         | 27.3%         | 23.0%         |                          |
|   | \$250,001–\$1 Million        | 207          | 6.8%          | 4.5%          | 96,813         | 42.5%         | 44.9%         |                          |
|   | Over \$1 Million             | -            | 0.0%          | 0.0%          | -              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>3,029</b> | <b>100.0%</b> | <b>100.0%</b> | <b>227,809</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 850          | 75.9%         |               | 26,269         | 26.7%         |               |                          |
|   | \$100,001–\$250,000          | 172          | 15.4%         |               | 27,939         | 28.4%         |               |                          |
|   | \$250,001–\$1 Million        | 98           | 8.8%          |               | 44,297         | 45.0%         |               |                          |
|   | Over \$1 Million             | -            | 0.0%          |               | -              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>1,120</b> | <b>100.0%</b> |               | <b>98,505</b>  | <b>100.0%</b> |               |                          |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms<br>%    |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |               |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 363        | 91.4%         | 71.0%         | 18,594        | 92.1%         | 80.2%         | 99.1%         |
|   | Over \$1 Million/<br>Unknown | 34         | 8.6%          | 29.0%         | 1,584         | 7.9%          | 19.8%         | 0.9%          |
|   | <b>TOTAL</b>                 | <b>397</b> | <b>100.0%</b> | <b>100.0%</b> | <b>20,178</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 342        | 86.1%         | 78.7%         | 9,602         | 47.6%         | 30.1%         |               |
|   | \$100,001–\$250,000          | 43         | 10.8%         | 14.0%         | 6,621         | 32.8%         | 32.5%         |               |
|   | \$250,001–\$500,000          | 12         | 3.0%          | 7.3%          | 3,955         | 19.6%         | 37.4%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>397</b> | <b>100.0%</b> | <b>100.0%</b> | <b>20,178</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 311        | 85.7%         |               | 8,654         | 46.5%         |               |               |
|   | \$100,001–\$250,000          | 41         | 11.3%         |               | 6,310         | 33.9%         |               |               |
|   | \$250,001–\$1 Million        | 11         | 3.0%          |               | 3,630         | 19.5%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>363</b> | <b>100.0%</b> |               | <b>18,594</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                                |                       |               |               |               |               |               |               |
|---|--------------------------------|-----------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                                | Count                 |               |               | Dollars       |               |               | Farms<br>%    |
|   |                                | Bank                  |               | Aggregate     | Bank          |               | Aggregate     |               |
|   |                                | #                     | %             | %             | \$ (000s)     | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less            | 686                   | 74.7%         | 65.5%         | 48,657        | 75.5%         | 79.5%         | 98.9%         |
|   | Over \$1 Million/<br>Unknown   | 232                   | 25.3%         | 34.5%         | 15,801        | 24.5%         | 20.5%         | 1.1%          |
|   | <b>TOTAL</b>                   | <b>918</b>            | <b>100.0%</b> | <b>100.0%</b> | <b>64,458</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less              | 747                   | 81.4%         | 76.9%         | 23,845        | 37.0%         | 28.1%         |               |
|   | \$100,001–\$250,000            | 108                   | 11.8%         | 14.3%         | 16,994        | 26.4%         | 30.3%         |               |
|   | \$250,001–\$500,000            | 63                    | 6.9%          | 8.8%          | 23,619        | 36.6%         | 41.6%         |               |
|   | Over \$500,000                 | 0                     | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                   | <b>918</b>            | <b>100.0%</b> | <b>100.0%</b> | <b>64,458</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size   | Revenue \$1 Million<br>or Less | \$100,000 or Less     | 553           | 80.6%         |               | 19,048        | 39.1%         |               |
|   |                                | \$100,001–\$250,000   | 89            | 13.0%         |               | 13,843        | 28.5%         |               |
|   |                                | \$250,001–\$1 Million | 44            | 6.4%          |               | 15,766        | 32.4%         |               |
|   |                                | Over \$1 Million      | 0             | 0.0%          |               | 0             | 0.0%          |               |
|   |                                | <b>TOTAL</b>          | <b>686</b>    | <b>100.0%</b> |               | <b>48,657</b> | <b>100.0%</b> |               |

## Columbia

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | ##            | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 4          | 6.2%          | 379           | 2.9%          | 1.4%                          | 1.5%                | 0.7%          |
| Moderate   | 6          | 9.2%          | 899           | 6.9%          | 9.9%                          | 12.1%               | 8.6%          |
| Middle   | 39         | 60.0%         | 8,257         | 63.4%         | 60.5%                         | 57.0%               | 54.9%         |
| Upper  | 16         | 24.6%         | 3,482         | 26.8%         | 28.0%                         | 28.6%               | 35.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.4%                          | 0.8%                | 0.6%          |
| <b>TOTAL</b>   | <b>65</b>  | <b>100.0%</b> | <b>13,016</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 1.4%                          | 0.8%                | 0.4%          |
| Moderate   | 3          | 9.1%          | 526           | 7.1%          | 9.9%                          | 8.1%                | 5.4%          |
| Middle   | 19         | 57.6%         | 3,991         | 54.2%         | 60.5%                         | 56.6%               | 54.2%         |
| Upper  | 11         | 33.3%         | 2,848         | 38.7%         | 28.0%                         | 32.9%               | 38.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.4%                          | 1.6%                | 1.1%          |
| <b>TOTAL</b>   | <b>33</b>  | <b>100.0%</b> | <b>7,365</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 1.4%                          | 1.1%                | 0.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 9.9%                          | 8.0%                | 5.8%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 60.5%                         | 54.0%               | 50.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 28.0%                         | 35.1%               | 40.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.4%                          | 1.7%                | 2.8%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 7.9%                          | 4.7%                | 6.9%          |
| Moderate   | 1          | 25.0%         | 310           | 10.0%         | 18.4%                         | 18.8%               | 8.7%          |
| Middle   | 2          | 50.0%         | 2,468         | 79.5%         | 31.4%                         | 57.8%               | 61.5%         |
| Upper  | 1          | 25.0%         | 328           | 10.6%         | 27.0%                         | 14.1%               | 10.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 15.3%                         | 4.7%                | 12.4%         |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>3,106</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 1.4%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 9.9%                          | 13.4%               | 9.7%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 60.5%                         | 59.7%               | 51.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 28.0%                         | 26.9%               | 38.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 1.4%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 9.9%                          | 10.4%               | 6.7%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 60.5%                         | 62.3%               | 54.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 28.0%                         | 24.7%               | 38.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.4%                          | 2.6%                | 0.9%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 1.4%                          | 3.0%                | 1.8%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 9.9%                          | 16.7%               | 14.7%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 60.5%                         | 71.2%               | 72.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 28.0%                         | 9.1%                | 11.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 4          | 3.9%          | 379           | 1.6%          | 1.4%          | 1.2%          | 1.1%          |
| Moderate                  | 10         | 9.8%          | 1,735         | 7.4%          | 9.9%          | 10.8%         | 7.5%          |
| Middle                    | 60         | 58.8%         | 14,716        | 62.7%         | 60.5%         | 57.0%         | 55.2%         |
| Upper                     | 28         | 27.5%         | 6,658         | 28.3%         | 28.0%         | 29.8%         | 34.5%         |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.4%          | 1.1%          | 1.7%          |
| <b>TOTAL</b>              | <b>102</b> | <b>100.0%</b> | <b>23,487</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |                |               |                               |                     |               |
|--|------------|---------------|----------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)      | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 14         | 2.2%          | 1,223          | 0.9%          | 1.4%                          | 1.5%                | 0.9%          |
| Moderate   | 63         | 10.0%         | 8,684          | 6.5%          | 9.9%                          | 11.4%               | 8.1%          |
| Middle   | 344        | 54.8%         | 68,339         | 50.9%         | 60.5%                         | 59.4%               | 56.3%         |
| Upper  | 203        | 32.3%         | 54,527         | 40.6%         | 28.0%                         | 27.1%               | 34.1%         |
| Unknown  | 4          | 0.6%          | 1,479          | 1.1%          | 0.4%                          | 0.5%                | 0.6%          |
| <b>TOTAL</b>   | <b>628</b> | <b>100.0%</b> | <b>134,252</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                               |                     |               |
| Low  | 9          | 1.2%          | 809            | 0.5%          | 1.4%                          | 0.7%                | 0.4%          |
| Moderate   | 44         | 5.6%          | 5,764          | 3.5%          | 9.9%                          | 7.8%                | 5.4%          |
| Middle   | 448        | 57.3%         | 90,066         | 54.7%         | 60.5%                         | 57.0%               | 54.7%         |
| Upper  | 279        | 35.7%         | 67,847         | 41.2%         | 28.0%                         | 34.3%               | 39.2%         |
| Unknown  | 2          | 0.3%          | 306            | 0.2%          | 0.4%                          | 0.3%                | 0.3%          |
| <b>TOTAL</b>   | <b>782</b> | <b>100.0%</b> | <b>164,792</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 1.4%                          | 3.1%                | 1.4%          |
| Moderate   | 1          | 12.5%         | 34             | 2.0%          | 9.9%                          | 10.6%               | 8.5%          |
| Middle   | 4          | 50.0%         | 1,047          | 60.4%         | 60.5%                         | 53.8%               | 49.1%         |
| Upper  | 3          | 37.5%         | 652            | 37.6%         | 28.0%                         | 32.5%               | 41.0%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>8</b>   | <b>100.0%</b> | <b>1,733</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                               |                     |               |
| Low  | 4          | 18.2%         | 7,431          | 9.8%          | 7.9%                          | 15.1%               | 12.8%         |
| Moderate   | 6          | 27.3%         | 3,129          | 4.1%          | 18.4%                         | 17.4%               | 7.0%          |
| Middle   | 8          | 36.4%         | 3,862          | 5.1%          | 31.4%                         | 40.7%               | 19.9%         |
| Upper  | 4          | 18.2%         | 61,280         | 80.9%         | 27.0%                         | 17.4%               | 45.4%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 15.3%                         | 9.3%                | 14.9%         |
| <b>TOTAL</b>   | <b>22</b>  | <b>100.0%</b> | <b>75,702</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 1.4%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 9.9%                          | 8.5%                | 2.5%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 60.5%                         | 55.9%               | 46.9%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 28.0%                         | 35.6%               | 50.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |                |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 1.4%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 9.9%                          | 3.4%                | 0.4%          |
| Middle   | 5          | 62.5%         | 1,475          | 80.1%         | 60.5%                         | 54.2%               | 50.8%         |
| Upper  | 3          | 37.5%         | 366            | 19.9%         | 28.0%                         | 42.4%               | 48.8%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.4%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>8</b>   | <b>100.0%</b> | <b>1,841</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Purpose Not Applicable    |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 1.4%          | 1.5%          | 0.9%          |
| Moderate                  | 0            | 0.0%          | 0              | 0.0%          | 9.9%          | 11.8%         | 8.2%          |
| Middle                    | 0            | 0.0%          | 0              | 0.0%          | 60.5%         | 70.3%         | 67.5%         |
| Upper                     | 0            | 0.0%          | 0              | 0.0%          | 28.0%         | 16.4%         | 23.3%         |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.4%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |              |               |                |               |               |               |               |
| Low                       | 27           | 1.9%          | 9,463          | 2.5%          | 1.4%          | 1.2%          | 1.6%          |
| Moderate                  | 114          | 7.9%          | 17,611         | 4.7%          | 9.9%          | 9.5%          | 6.6%          |
| Middle                    | 809          | 55.9%         | 164,789        | 43.6%         | 60.5%         | 58.0%         | 52.8%         |
| Upper                     | 492          | 34.0%         | 184,672        | 48.8%         | 28.0%         | 30.8%         | 37.5%         |
| Unknown                   | 6            | 0.4%          | 1,785          | 0.5%          | 0.4%          | 0.5%          | 1.5%          |
| <b>TOTAL</b>              | <b>1,448</b> | <b>100.0%</b> | <b>378,320</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |               |               |                 |                        |               |
|---|---------------------------|---------------|---------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | ##%           | \$ (000s)     | \$ %          |                 | %                      | \$ %          |
| Low   | 11                        | 6.5%          | 1,630         | 13.8%         | 9.9%            | 9.0%                   | 11.4%         |
| Moderate  | 7                         | 4.1%          | 820           | 7.0%          | 12.0%           | 9.9%                   | 12.7%         |
| Middle  | 133                       | 78.2%         | 6,804         | 57.8%         | 47.8%           | 49.3%                  | 45.8%         |
| Upper   | 17                        | 10.0%         | 2,191         | 18.6%         | 25.0%           | 27.0%                  | 25.5%         |
| Unknown   | 2                         | 1.2%          | 330           | 2.8%          | 5.2%            | 4.7%                   | 4.6%          |
| <b>TOTAL</b>  | <b>170</b>                | <b>100.0%</b> | <b>11,775</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                    |                        |               |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | ##%           | \$ (000s)      | \$ %          |                    | %                      | \$ %          |
| Low   | 222                       | 11.2%         | 21,524         | 11.1%         | 9.9%               | 10.3%                  | 13.5%         |
| Moderate  | 188                       | 9.5%          | 25,343         | 13.1%         | 12.4%              | 9.5%                   | 11.4%         |
| Middle  | 950                       | 48.0%         | 86,888         | 44.9%         | 47.4%              | 46.2%                  | 42.9%         |
| Upper   | 517                       | 26.1%         | 47,380         | 24.5%         | 25.3%              | 29.5%                  | 26.3%         |
| Unknown   | 101                       | 5.1%          | 12,275         | 6.3%          | 5.0%               | 4.4%                   | 5.9%          |
| <b>TOTAL</b>  | <b>1,978</b>              | <b>100.0%</b> | <b>193,410</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |              |               |               |                        |               |
|---|-----------------------|---------------|--------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |              |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | ##%           | \$ (000s)    | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0            | 0.0%          | 0.8%          | 1.2%                   | 0.6%          |
| Moderate  | 0                     | 0.0%          | 0            | 0.0%          | 7.3%          | 2.0%                   | 0.5%          |
| Middle  | 29                    | 100.0%        | 1,464        | 100.0%        | 81.4%         | 93.0%                  | 95.1%         |
| Upper   | 0                     | 0.0%          | 0            | 0.0%          | 10.6%         | 3.9%                   | 3.7%          |
| Unknown   | 0                     | 0.0%          | 0            | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>29</b>             | <b>100.0%</b> | <b>1,464</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | ##%           | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 1                     | 0.8%          | 20            | 0.2%          | 0.8%          | 0.3%                   | 0.1%          |
| Moderate  | 4                     | 3.1%          | 737           | 6.3%          | 7.3%          | 2.6%                   | 3.0%          |
| Middle  | 121                   | 92.4%         | 10,711        | 91.5%         | 83.9%         | 90.4%                  | 90.1%         |
| Upper   | 5                     | 3.8%          | 237           | 2.0%          | 8.1%          | 6.7%                   | 6.8%          |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>131</b>            | <b>100.0%</b> | <b>11,705</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 8.2%                | 4.7%          |
| Moderate   | 17         | 26.2%         | 2,266         | 17.4%         | 16.6%                             | 19.8%               | 15.0%         |
| Middle   | 9          | 13.8%         | 1,652         | 12.7%         | 21.8%                             | 21.3%               | 20.4%         |
| Upper  | 34         | 52.3%         | 8,618         | 66.2%         | 40.5%                             | 31.6%               | 41.7%         |
| Unknown  | 5          | 7.7%          | 481           | 3.7%          | 0.0%                              | 19.1%               | 18.3%         |
| <b>TOTAL</b>   | <b>65</b>  | <b>100.0%</b> | <b>13,016</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 1          | 3.0%          | 125           | 1.7%          | 21.1%                             | 6.3%                | 3.2%          |
| Moderate   | 2          | 6.1%          | 312           | 4.2%          | 16.6%                             | 14.8%               | 9.7%          |
| Middle   | 6          | 18.2%         | 799           | 10.8%         | 21.8%                             | 19.1%               | 15.6%         |
| Upper  | 23         | 69.7%         | 5,941         | 80.7%         | 40.5%                             | 35.9%               | 46.3%         |
| Unknown  | 1          | 3.0%          | 188           | 2.6%          | 0.0%                              | 23.9%               | 25.1%         |
| <b>TOTAL</b>   | <b>33</b>  | <b>100.0%</b> | <b>7,365</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 8.0%                | 5.4%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 16.6%                             | 16.7%               | 11.9%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.8%                             | 27.0%               | 25.1%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.5%                             | 42.0%               | 54.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 6.3%                | 3.5%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 16.6%                             | 1.6%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.8%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.5%                             | 10.9%               | 2.1%          |
| Unknown  | 4          | 100.0%        | 3,106         | 100.0%        | 0.0%                              | 87.5%               | 97.9%         |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>3,106</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 6.0%                | 3.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 16.6%                             | 23.9%               | 16.4%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.8%                             | 29.9%               | 28.9%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.5%                             | 34.3%               | 43.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 6.0%                | 8.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 9.1%                | 5.2%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 16.6%                             | 15.6%               | 10.4%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.8%                             | 13.0%               | 5.5%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.5%                             | 49.4%               | 59.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 13.0%               | 19.8%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.1%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 16.6%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 21.8%                             | 1.5%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.5%                             | 0.0%                | 0.0%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 98.5%               | 100.0%        |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 1          | 1.0%          | 125           | 0.5%          | 21.1%         | 7.4%          | 3.8%          |
| Moderate                  | 19         | 18.6%         | 2,578         | 11.0%         | 16.6%         | 17.7%         | 12.0%         |
| Middle                    | 15         | 14.7%         | 2,451         | 10.4%         | 21.8%         | 20.3%         | 17.2%         |
| Upper                     | 57         | 55.9%         | 14,559        | 62.0%         | 40.5%         | 33.0%         | 40.3%         |
| Unknown                   | 10         | 9.8%          | 3,775         | 16.1%         | 0.0%          | 21.6%         | 26.7%         |
| <b>TOTAL</b>              | <b>102</b> | <b>100.0%</b> | <b>23,487</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |                |               |                                   |                     |               |
|--|------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$             | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 51         | 8.1%          | 6,011          | 4.5%          | 21.1%                             | 9.8%                | 5.8%          |
| Moderate   | 139        | 22.1%         | 21,214         | 15.8%         | 16.6%                             | 21.6%               | 16.7%         |
| Middle   | 108        | 17.2%         | 21,507         | 16.0%         | 21.8%                             | 20.0%               | 19.0%         |
| Upper  | 227        | 36.1%         | 66,898         | 49.8%         | 40.5%                             | 31.2%               | 42.0%         |
| Unknown  | 103        | 16.4%         | 18,622         | 13.9%         | 0.0%                              | 17.4%               | 16.4%         |
| <b>TOTAL</b>   | <b>628</b> | <b>100.0%</b> | <b>134,252</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                                   |                     |               |
| Low  | 35         | 4.5%          | 3,761          | 2.3%          | 21.1%                             | 4.5%                | 2.3%          |
| Moderate   | 106        | 13.6%         | 14,910         | 9.0%          | 16.6%                             | 13.7%               | 9.2%          |
| Middle   | 167        | 21.4%         | 29,042         | 17.6%         | 21.8%                             | 19.2%               | 15.8%         |
| Upper  | 368        | 47.1%         | 92,886         | 56.4%         | 40.5%                             | 40.9%               | 49.7%         |
| Unknown  | 106        | 13.6%         | 24,193         | 14.7%         | 0.0%                              | 21.8%               | 23.0%         |
| <b>TOTAL</b>   | <b>782</b> | <b>100.0%</b> | <b>164,792</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                                   |                     |               |
| Low  | 1          | 12.5%         | 34             | 2.0%          | 21.1%                             | 6.3%                | 3.7%          |
| Moderate   | 1          | 12.5%         | 400            | 23.1%         | 16.6%                             | 17.5%               | 12.1%         |
| Middle   | 2          | 25.0%         | 230            | 13.3%         | 21.8%                             | 25.6%               | 19.6%         |
| Upper  | 4          | 50.0%         | 1,069          | 61.7%         | 40.5%                             | 43.1%               | 56.7%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 7.5%                | 7.9%          |
| <b>TOTAL</b>   | <b>8</b>   | <b>100.0%</b> | <b>1,733</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.1%                             | 1.2%                | 0.1%          |
| Moderate   | 1          | 4.5%          | 255            | 0.3%          | 16.6%                             | 2.3%                | 0.3%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 21.8%                             | 0.0%                | 0.0%          |
| Upper  | 1          | 4.5%          | 133            | 0.2%          | 40.5%                             | 4.7%                | 0.6%          |
| Unknown  | 20         | 90.9%         | 75,314         | 99.5%         | 0.0%                              | 91.9%               | 98.9%         |
| <b>TOTAL</b>   | <b>22</b>  | <b>100.0%</b> | <b>75,702</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.1%                             | 3.4%                | 0.5%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.6%                             | 10.2%               | 4.1%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 21.8%                             | 25.4%               | 23.3%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 40.5%                             | 59.3%               | 70.1%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 1.7%                | 2.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |                |               |                                   |                     |               |
| Low  | 1          | 12.5%         | 45             | 2.4%          | 21.1%                             | 5.1%                | 1.5%          |
| Moderate   | 2          | 25.0%         | 280            | 15.2%         | 16.6%                             | 27.1%               | 20.7%         |
| Middle   | 1          | 12.5%         | 115            | 6.2%          | 21.8%                             | 25.4%               | 18.2%         |
| Upper  | 3          | 37.5%         | 977            | 53.1%         | 40.5%                             | 27.1%               | 38.0%         |
| Unknown  | 1          | 12.5%         | 424            | 23.0%         | 0.0%                              | 15.3%               | 21.6%         |
| <b>TOTAL</b>   | <b>8</b>   | <b>100.0%</b> | <b>1,841</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 21.1%         | 0.0%          | 0.0%          |
| Moderate                  | 0            | 0.0%          | 0              | 0.0%          | 16.6%         | 0.0%          | 0.0%          |
| Middle                    | 0            | 0.0%          | 0              | 0.0%          | 21.8%         | 0.0%          | 0.0%          |
| Upper                     | 0            | 0.0%          | 0              | 0.0%          | 40.5%         | 0.0%          | 0.0%          |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 100.0%        | 100.0%        |
| <b>TOTAL</b>              | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |              |               |                |               |               |               |               |
| Low                       | 88           | 6.1%          | 9,851          | 2.6%          | 21.1%         | 6.6%          | 3.5%          |
| Moderate                  | 249          | 17.2%         | 37,059         | 9.8%          | 16.6%         | 16.8%         | 11.4%         |
| Middle                    | 278          | 19.2%         | 50,894         | 13.5%         | 21.8%         | 19.2%         | 15.8%         |
| Upper                     | 603          | 41.6%         | 161,963        | 42.8%         | 40.5%         | 35.8%         | 42.4%         |
| Unknown                   | 230          | 15.9%         | 118,553        | 31.3%         | 0.0%          | 21.6%         | 26.9%         |
| <b>TOTAL</b>              | <b>1,448</b> | <b>100.0%</b> | <b>378,320</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |                |               |               |                  |
|---|------------------------------|------------|---------------|---------------|----------------|---------------|---------------|------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars        |               |               | Total Businesses |
|   |                              | Bank       |               | Aggregate     | Bank           |               | Aggregate     |                  |
|   |                              | #          | %             | %             | \$<br>(000s)   | \$ %          | \$ %          | %                |
| Business Revenue  | \$1 Million or Less          | 56         | 32.9%         | 51.9%         | 5,571          | 47.3%         | 45.9%         | 91.6%            |
|   | Over \$1 Million/<br>Unknown | 114        | 67.1%         | 48.1%         | 6,204          | 52.7%         | 54.1%         | 8.4%             |
|   | <b>TOTAL</b>                 | <b>170</b> | <b>100.0%</b> | <b>100.0%</b> | <b>11,775</b>  | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>    |
| Loan Size   | \$100,000 or Less            | 150        | 88.2%         | 89.4%         | 3,707          | 31.5%         | 28.6%         |                  |
|   | \$100,001–\$250,000          | 7          | 4.1%          | 5.7%          | 1,175          | 10.0%         | 18.7%         |                  |
|   | \$250,001–\$1 Million        | 13         | 7.6%          | 5.0%          | 6,893          | 58.5%         | 52.7%         |                  |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                  |
|   | <b>TOTAL</b>                 | <b>170</b> | <b>100.0%</b> | <b>100.0%</b> | <b>11,775</b>  | <b>100.0%</b> | <b>100.0%</b> |                  |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 44         | 78.6%         |               | 1,657          | 29.7%         |               |                  |
|   | \$100,001–\$250,000          | 5          | 8.9%          |               | 846            | 15.2%         |               |                  |
|   | \$250,001–\$1 Million        | 7          | 12.5%         |               | 3,068          | 55.1%         |               |                  |
|   | Over \$1 Million             | 0          | 0.0%          |               | \$0            | 0.0%          |               |                  |
|   | <b>TOTAL</b>                 | <b>56</b>  | <b>100.0%</b> |               | <b>\$5,571</b> | <b>100.0%</b> |               |                  |

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |              |               |               |                |               |               |                          |
|---|------------------------------|--------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count        |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank         |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #            | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 758          | 38.3%         | 38.4%         | 92,100         | 47.6%         | 37.6%         | 91.7%                    |
|   | Over \$1 Million/<br>Unknown | 1,220        | 61.7%         | 61.6%         | 101,310        | 52.4%         | 62.4%         | 8.3%                     |
|   | <b>TOTAL</b>                 | <b>1,978</b> | <b>100.0%</b> | <b>100.0%</b> | <b>193,410</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 1,476        | 74.6%         | 82.0%         | 46,166         | 23.9%         | 24.0%         |                          |
|   | \$100,001–\$250,000          | 290          | 14.7%         | 9.5%          | 45,671         | 23.6%         | 19.5%         |                          |
|   | \$250,001–\$1 Million        | 212          | 10.7%         | 8.5%          | 101,573        | 52.5%         | 56.5%         |                          |
|   | Over \$1 Million             | 0            | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>1,978</b> | <b>100.0%</b> | <b>100.0%</b> | <b>193,410</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 510          | 67.3%         |               | 17,814         | 19.3%         |               |                          |
|   | \$100,001–\$250,000          | 133          | 17.5%         |               | 21,296         | 23.1%         |               |                          |
|   | \$250,001–\$1 Million        | 115          | 15.2%         |               | 52,990         | 57.5%         |               |                          |
|   | Over \$1 Million             | 0            | 0.0%          |               | 0              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>758</b>   | <b>100.0%</b> |               | <b>92,100</b>  | <b>100.0%</b> |               |                          |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |           |               |               |              |               |               |               |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count     |               |               | Dollars      |               |               | Farms<br>%    |
|   |                              | Bank      |               | Aggregate     | Bank         |               | Aggregate     |               |
|   |                              | #         | %             | %             | \$ (000s)    | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 27        | 93.1%         | 55.1%         | 1,203        | 82.2%         | 68.8%         | 99.0%         |
|   | Over \$1 Million/<br>Unknown | 2         | 6.9%          | 44.9%         | 261          | 17.8%         | 31.2%         | 1.0%          |
|   | <b>TOTAL</b>                 | <b>29</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,464</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 25        | 86.2%         | 80.5%         | 762          | 52.0%         | 31.2%         |               |
|   | \$100,001–\$250,000          | 4         | 13.8%         | 12.9%         | 702          | 48.0%         | 34.7%         |               |
|   | \$250,001–\$500,000          | 0         | 0.0%          | 6.6%          | 0            | 0.0%          | 34.1%         |               |
|   | Over \$500,000               | 0         | 0.0%          | 0.0%          | 0            | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>29</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,464</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 25        | 92.6%         |               | 762          | 63.3%         |               |               |
|   | \$100,001–\$250,000          | 2         | 7.4%          |               | 441          | 36.7%         |               |               |
|   | \$250,001–\$1 Million        | 0         | 0.0%          |               | 0            | 0.0%          |               |               |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0            | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>27</b> | <b>100.0%</b> |               | <b>1,203</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms         |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     | %             |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 91         | 69.5%         | 55.4%         | 9,134         | 78.0%         | 73.3%         | 99.0%         |
|   | Over \$1 Million/<br>Unknown | 40         | 30.5%         | 44.6%         | 2,571         | 22.0%         | 26.7%         | 1.0%          |
|   | <b>TOTAL</b>                 | <b>131</b> | <b>100.0%</b> | <b>100.0%</b> | <b>11,705</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 94         | 71.8%         | 76.9%         | 3,257         | 27.8%         | 24.1%         |               |
|   | \$100,001–\$250,000          | 23         | 17.6%         | 12.5%         | 3,511         | 30.0%         | 26.7%         |               |
|   | \$250,001–\$500,000          | 14         | 10.7%         | 10.6%         | 4,937         | 42.2%         | 49.2%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>131</b> | <b>100.0%</b> | <b>100.0%</b> | <b>11,705</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 62         | 68.1%         |               | 2,475         | 27.1%         |               |               |
|   | \$100,001–\$250,000          | 17         | 18.7%         |               | 2,577         | 28.2%         |               |               |
|   | \$250,001–\$1 Million        | 12         | 13.2%         |               | 4,082         | 44.7%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>91</b>  | <b>100.0%</b> |               | <b>9,134</b>  | <b>100.0%</b> |               |               |

## Branson

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census<br>Tract<br>Income<br>Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 17         | 8.2%          | 2,702         | 8.0%          | 7.0%                          | 6.3%                | 5.8%          |
| Middle   | 181        | 87.0%         | 28,907        | 85.9%         | 87.3%                         | 86.6%               | 84.7%         |
| Upper  | 10         | 4.8%          | 2,023         | 6.0%          | 5.8%                          | 7.2%                | 9.5%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>208</b> | <b>100.0%</b> | <b>33,633</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 1          | 9.1%          | 72            | 3.3%          | 7.0%                          | 6.0%                | 5.2%          |
| Middle   | 8          | 72.7%         | 1,739         | 78.6%         | 87.3%                         | 87.4%               | 88.1%         |
| Upper  | 2          | 18.2%         | 401           | 18.1%         | 5.8%                          | 6.6%                | 6.8%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>11</b>  | <b>100.0%</b> | <b>2,212</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 3.4%                | 1.5%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.3%                         | 92.0%               | 96.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 4.5%                | 2.2%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 21.1%               | 12.6%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.7%                         | 63.2%               | 63.2%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 6.7%                          | 15.8%               | 24.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 3.2%                | 3.3%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.3%                         | 96.8%               | 96.7%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 0.0%                | 0.0%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 6.1%                | 8.3%          |
| Middle   | 1          | 100.0%        | 484           | 100.0%        | 87.3%                         | 89.8%               | 83.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 4.1%                | 8.2%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>484</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 8.1%                | 5.5%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.3%                         | 89.2%               | 87.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 2.7%                | 7.0%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Moderate                  | 18         | 8.2%          | 2,774         | 7.6%          | 7.0%          | 6.2%          | 5.8%          |
| Middle                    | 190        | 86.4%         | 31,130        | 85.7%         | 87.3%         | 87.1%         | 85.3%         |
| Upper                     | 12         | 5.5%          | 2,424         | 6.7%          | 5.8%          | 6.7%          | 8.9%          |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>220</b> | <b>100.0%</b> | <b>36,329</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 33         | 10.4%         | 4,908         | 7.9%          | 7.0%                          | 5.8%                | 4.6%          |
| Middle   | 263        | 83.2%         | 52,542        | 84.6%         | 87.3%                         | 85.2%               | 84.2%         |
| Upper  | 20         | 6.3%          | 4,654         | 7.5%          | 5.8%                          | 9.0%                | 11.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>316</b> | <b>100.0%</b> | <b>62,104</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 4.5%                | 3.6%          |
| Middle   | 25         | 100.0%        | 5,292         | 100.0%        | 87.3%                         | 87.4%               | 87.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 8.0%                | 9.1%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>25</b>  | <b>100.0%</b> | <b>5,292</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 5.3%                | 4.9%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.3%                         | 88.2%               | 85.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 6.6%                | 9.7%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 5.3%                | 10.3%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.7%                         | 78.9%               | 78.9%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 6.7%                          | 15.8%               | 10.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 6.4%                | 3.6%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.3%                         | 87.2%               | 91.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 6.4%                | 5.1%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 7.0%                          | 8.9%                | 10.0%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 87.3%                         | 87.5%               | 87.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 5.8%                          | 3.6%                | 2.4%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Purpose Not Applicable    |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0             | 0.0%          | 7.0%          | 8.0%          | 7.4%          |
| Middle                    | 0          | 0.0%          | 0             | 0.0%          | 87.3%         | 90.3%         | 89.5%         |
| Upper                     | 0          | 0.0%          | 0             | 0.0%          | 5.8%          | 1.8%          | 3.1%          |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |               |               |               |               |               |
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Moderate                  | 33         | 9.7%          | 4,908         | 7.3%          | 7.0%          | 5.3%          | 4.4%          |
| Middle                    | 288        | 84.5%         | 57,834        | 85.8%         | 87.3%         | 86.4%         | 85.7%         |
| Upper                     | 20         | 5.9%          | 4,654         | 6.9%          | 5.8%          | 8.3%          | 9.9%          |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>341</b> | <b>100.0%</b> | <b>67,396</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |               |               |                 |                        |               |
|---|---------------------------|---------------|---------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | ##%           | \$ (000s)     | \$ %          |                 | %                      | \$ %          |
| Low   | 0                         | 0.0%          | 0             | 0.0%          | 0.0%            | 0.0%                   | 0.0%          |
| Moderate  | 23                        | 8.9%          | 4,365         | 13.2%         | 6.5%            | 6.2%                   | 7.6%          |
| Middle  | 180                       | 70.0%         | 21,033        | 63.6%         | 87.7%           | 84.9%                  | 82.9%         |
| Upper   | 54                        | 21.0%         | 7,667         | 23.2%         | 5.8%            | 6.7%                   | 8.9%          |
| Unknown   | 0                         | 0.0%          | 0             | 0.0%          | 0.0%            | 2.2%                   | 0.7%          |
| <b>TOTAL</b>  | <b>257</b>                | <b>100.0%</b> | <b>33,065</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |             |               |             |                    |                        |               |
|---|---------------------------|-------------|---------------|-------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |             |               |             | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | ##%         | \$ (000s)     | \$ %        |                    | %                      | \$ %          |
| Low   | 0                         | 0.0%        | 0             | 0.0%        | 0.0%               | 0.0%                   | 0.0%          |
| Moderate  | 49                        | 0.0%        | 4,086         | 0.0%        | 6.6%               | 6.2%                   | 5.6%          |
| Middle  | 416                       | 0.0%        | 39,679        | 0.0%        | 87.8%              | 87.2%                  | 86.6%         |
| Upper   | 46                        | 0.0%        | 5,872         | 0.0%        | 5.6%               | 6.2%                   | 7.6%          |
| Unknown   | 0                         | 0.0%        | 0             | 0.0%        | 0.0%               | 0.3%                   | 0.2%          |
| <b>TOTAL</b>  | <b>511</b>                | <b>0.0%</b> | <b>49,637</b> | <b>0.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |            |               |               |                        |               |
|---|-----------------------|---------------|------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |            |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | ##%           | \$ (000s)  | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0          | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| Moderate  | 0                     | 0.0%          | 0          | 0.0%          | 3.1%          | 3.7%                   | 8.7%          |
| Middle  | 12                    | 100.0%        | 709        | 100.0%        | 96.9%         | 90.8%                  | 86.2%         |
| Upper   | 0                     | 0.0%          | 0          | 0.0%          | 0.0%          | 1.8%                   | 4.2%          |
| Unknown   | 0                     | 0.0%          | 0          | 0.0%          | 0.0%          | 3.7%                   | 0.9%          |
| <b>TOTAL</b>  | <b>12</b>             | <b>100.0%</b> | <b>709</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |               |              |               |               |                        |               |
|---|-----------------------|---------------|--------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |              |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | ##%           | \$ (000s)    | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0            | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| Moderate  | 0                     | 0.0%          | 0            | 0.0%          | 1.8%          | 2.7%                   | 6.6%          |
| Middle  | 23                    | 100.0%        | 1,073        | 100.0%        | 98.2%         | 94.7%                  | 88.0%         |
| Upper   | 0                     | 0.0%          | 0            | 0.0%          | 0.0%          | 1.8%                   | 4.9%          |
| Unknown   | 0                     | 0.0%          | 0            | 0.0%          | 0.0%          | 0.9%                   | 0.4%          |
| <b>TOTAL</b>  | <b>23</b>             | <b>100.0%</b> | <b>1,073</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 15         | 7.2%          | 967           | 2.9%          | 18.1%                             | 2.7%                | 1.3%          |
| Moderate   | 28         | 13.5%         | 2,773         | 8.2%          | 20.3%                             | 12.1%               | 8.1%          |
| Middle   | 47         | 22.6%         | 6,019         | 17.9%         | 23.5%                             | 19.5%               | 16.4%         |
| Upper  | 117        | 56.3%         | 23,423        | 69.6%         | 38.1%                             | 50.1%               | 58.7%         |
| Unknown  | 1          | 0.5%          | 450           | 1.3%          | 0.0%                              | 15.7%               | 15.5%         |
| <b>TOTAL</b>   | <b>208</b> | <b>100.0%</b> | <b>33,633</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 5.4%                | 2.6%          |
| Moderate   | 1          | 9.1%          | 198           | 9.0%          | 20.3%                             | 11.8%               | 7.7%          |
| Middle   | 3          | 27.3%         | 284           | 12.8%         | 23.5%                             | 16.1%               | 13.1%         |
| Upper  | 7          | 63.6%         | 1,730         | 78.2%         | 38.1%                             | 45.4%               | 54.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 21.2%               | 22.0%         |
| <b>TOTAL</b>   | <b>11</b>  | <b>100.0%</b> | <b>2,212</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 10.2%               | 5.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 12.5%               | 12.3%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 25.0%               | 27.1%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 48.9%               | 50.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 3.4%                | 4.7%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 15.8%               | 13.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 84.2%               | 86.4%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 6.3%                | 3.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 4.8%                | 1.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 23.8%               | 16.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 57.1%               | 73.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 7.9%                | 5.7%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 6.1%                | 2.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 10.2%               | 5.4%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 26.5%               | 20.6%         |
| Upper  | 1          | 100.0%        | 484           | 100.0%        | 38.1%                             | 49.0%               | 58.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 8.2%                | 12.6%         |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>484</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 5.4%                | 10.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 94.6%               | 89.5%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 15         | 6.8%          | 967           | 2.7%          | 18.1%         | 3.9%          | 1.7%          |
| Moderate                  | 29         | 13.2%         | 2,971         | 8.2%          | 20.3%         | 11.6%         | 7.5%          |
| Middle                    | 50         | 22.7%         | 6,303         | 17.4%         | 23.5%         | 18.4%         | 14.7%         |
| Upper                     | 125        | 56.8%         | 25,637        | 70.6%         | 38.1%         | 48.0%         | 55.3%         |
| Unknown                   | 1          | 0.5%          | 450           | 1.2%          | 0.0%          | 18.1%         | 20.7%         |
| <b>TOTAL</b>              | <b>220</b> | <b>100.0%</b> | <b>36,329</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$            | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 14         | 4.4%          | 1,359         | 2.2%          | 18.1%                             | 3.8%                | 2.0%          |
| Moderate   | 49         | 15.5%         | 5,644         | 9.1%          | 20.3%                             | 12.9%               | 8.1%          |
| Middle   | 65         | 20.6%         | 9,088         | 14.6%         | 23.5%                             | 18.2%               | 15.3%         |
| Upper  | 182        | 57.6%         | 44,415        | 71.5%         | 38.1%                             | 51.8%               | 60.5%         |
| Unknown  | 6          | 1.9%          | 1,598         | 2.6%          | 0.0%                              | 13.3%               | 14.1%         |
| <b>TOTAL</b>   | <b>316</b> | <b>100.0%</b> | <b>62,104</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 2.8%                | 1.2%          |
| Moderate   | 4          | 16.0%         | 352           | 6.7%          | 20.3%                             | 9.4%                | 5.7%          |
| Middle   | 1          | 4.0%          | 78            | 1.5%          | 23.5%                             | 15.2%               | 11.9%         |
| Upper  | 13         | 52.0%         | 2,971         | 56.1%         | 38.1%                             | 47.7%               | 53.0%         |
| Unknown  | 7          | 28.0%         | 1,891         | 35.7%         | 0.0%                              | 24.8%               | 28.1%         |
| <b>TOTAL</b>   | <b>25</b>  | <b>100.0%</b> | <b>5,292</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 5.3%                | 2.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 13.2%               | 8.4%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 19.7%               | 15.5%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 53.9%               | 65.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 7.9%                | 8.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 5.3%                | 1.3%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 94.7%               | 98.7%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 4.3%                | 1.2%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 6.4%                | 2.9%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 14.9%               | 11.5%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 59.6%               | 65.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 14.9%               | 18.5%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 18.1%                             | 12.5%               | 6.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 14.3%               | 6.7%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 23.5%                             | 14.3%               | 11.2%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.1%                             | 50.0%               | 68.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 8.9%                | 7.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 18.1%         | 0.0%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0             | 0.0%          | 20.3%         | 0.0%          | 0.0%          |
| Middle                    | 0          | 0.0%          | 0             | 0.0%          | 23.5%         | 0.0%          | 0.0%          |
| Upper                     | 0          | 0.0%          | 0             | 0.0%          | 38.1%         | 0.0%          | 0.0%          |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 100.0%        | 100.0%        |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |               |               |               |               |               |
| Low                       | 14         | 4.1%          | 1,359         | 2.0%          | 18.1%         | 3.4%          | 1.6%          |
| Moderate                  | 53         | 15.5%         | 5,996         | 8.9%          | 20.3%         | 10.9%         | 6.6%          |
| Middle                    | 66         | 19.4%         | 9,166         | 13.6%         | 23.5%         | 16.3%         | 12.9%         |
| Upper                     | 195        | 57.2%         | 47,386        | 70.3%         | 38.1%         | 48.6%         | 54.4%         |
| Unknown                   | 13         | 3.8%          | 3,489         | 5.2%          | 0.0%          | 20.9%         | 24.5%         |
| <b>TOTAL</b>              | <b>341</b> | <b>100.0%</b> | <b>67,396</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                  |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total Businesses |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                  |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          | %                |
| Business<br>Revenue   | \$1 Million or Less          | 139        | 54.1%         | 47.9%         | 16,419        | 49.7%         | 49.1%         | 93.1%            |
|   | Over \$1 Million/<br>Unknown | 118        | 45.9%         | 52.1%         | 16,646        | 50.3%         | 50.9%         | 6.9%             |
|   | <b>TOTAL</b>                 | <b>257</b> | <b>100.0%</b> | <b>100.0%</b> | <b>33,065</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>    |
| Loan Size   | \$100,000 or Less            | 172        | 66.9%         | 91.9%         | 7,226         | 21.9%         | 172           |                  |
|   | \$100,001–\$250,000          | 51         | 19.8%         | 4.4%          | 8,404         | 25.4%         | 51            |                  |
|   | \$250,001–\$1 Million        | 34         | 13.2%         | 3.7%          | 17,435        | 52.7%         | 34            |                  |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0             |                  |
|   | <b>TOTAL</b>                 | <b>257</b> | <b>100.0%</b> | <b>100.0%</b> | <b>33,065</b> | <b>100.0%</b> | <b>257</b>    |                  |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 92         | 66.2%         |               | 2,918         | 17.8%         |               |                  |
|   | \$100,001–\$250,000          | 28         | 20.1%         |               | 4,707         | 28.7%         |               |                  |
|   | \$250,001–\$1 Million        | 19         | 13.7%         |               | 8,794         | 53.6%         |               |                  |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                  |
|   | <b>TOTAL</b>                 | <b>139</b> | <b>100.0%</b> |               | <b>16,419</b> | <b>100.0%</b> |               |                  |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                     |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total<br>Businesses |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                     |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          | %                   |
| Business<br>Revenue   | \$1 Million or Less          | 164        | 32.1%         | 39.7%         | 20,679        | 41.7%         | 41.2%         | 93.2%               |
|   | Over \$1 Million/<br>Unknown | 347        | 67.9%         | 60.3%         | 28,958        | 58.3%         | 58.8%         | 6.8%                |
|   | <b>TOTAL</b>                 | <b>511</b> | <b>100.0%</b> | <b>100.0%</b> | <b>49,637</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>       |
| Loan Size   | \$100,000 or Less            | 374        | 73.2%         | 88.5%         | 11,525        | 23.2%         | 29.5%         |                     |
|   | \$100,001–\$250,000          | 85         | 16.6%         | 5.8%          | 13,405        | 27.0%         | 17.4%         |                     |
|   | \$250,001–\$1 Million        | 52         | 10.2%         | 5.7%          | 24,707        | 49.8%         | 53.1%         |                     |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                     |
|   | <b>TOTAL</b>                 | <b>511</b> | <b>100.0%</b> | <b>100.0%</b> | <b>49,637</b> | <b>100.0%</b> | <b>100.0%</b> |                     |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 99         | 60.4%         |               | 3,741         | 18.1%         |               |                     |
|   | \$100,001–\$250,000          | 44         | 26.8%         |               | 7,055         | 34.1%         |               |                     |
|   | \$250,001–\$1 Million        | 21         | 12.8%         |               | 9,883         | 47.8%         |               |                     |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                     |
|   | <b>TOTAL</b>                 | <b>164</b> | <b>100.0%</b> |               | <b>20,679</b> | <b>100.0%</b> |               |                     |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |           |               |               |            |               |               |               |
|---|------------------------------|-----------|---------------|---------------|------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count     |               |               | Dollars    |               |               | Farms         |
|   |                              | Bank      |               | Aggregate     | Bank       |               | Aggregate     |               |
|   |                              | #         | %             | %             | \$ (000s)  | \$ %          | \$ %          | %             |
| Farm<br>Revenue   | \$1 Million or Less          | 12        | 100.0%        | 78.9%         | 709        | 100.0%        | 85.4%         | 100.0%        |
|   | Over \$1 Million/<br>Unknown | 0         | 0.0%          | 21.1%         | 0          | 0.0%          | 14.6%         | 0.0%          |
|   | <b>TOTAL</b>                 | <b>12</b> | <b>100.0%</b> | <b>100.0%</b> | <b>709</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 10        | 83.3%         | 79.8%         | 245        | 34.6%         | 31.0%         |               |
|   | \$100,001–\$250,000          | 1         | 8.3%          | 13.8%         | 104        | 14.7%         | 35.7%         |               |
|   | \$250,001–\$500,000          | 1         | 8.3%          | 6.4%          | 360        | 50.8%         | 33.3%         |               |
|   | Over \$500,000               | 0         | 0.0%          | 0.0%          | 0          | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>12</b> | <b>100.0%</b> | <b>100.0%</b> | <b>709</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 10        | 83.3%         |               | 245        | 34.6%         |               |               |
|   | \$100,001–\$250,000          | 1         | 8.3%          |               | 104        | 14.7%         |               |               |
|   | \$250,001–\$1 Million        | 1         | 8.3%          |               | 360        | 50.8%         |               |               |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0          | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>12</b> | <b>100.0%</b> |               | <b>709</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |           |               |               |              |               |               |               |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count     |               |               | Dollars      |               |               | Farms         |
|   |                              | Bank      |               | Aggregate     | Bank         |               | Aggregate     | %             |
|   |                              | #         | %             | %             | \$<br>(000s) | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 20        | 87.0%         | 79.6%         | 943          | 87.9%         | 83.0%         | 100.0%        |
|   | Over \$1 Million/<br>Unknown | 3         | 13.0%         | 20.4%         | 130          | 12.1%         | 17.0%         | 0.0%          |
|   | <b>TOTAL</b>                 | <b>23</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,073</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 21        | 91.3%         | 82.3%         | 603          | 56.2%         | 40.1%         |               |
|   | \$100,001–\$250,000          | 1         | 4.3%          | 13.3%         | 110          | 10.3%         | 36.3%         |               |
|   | \$250,001–\$500,000          | 1         | 4.3%          | 4.4%          | 360          | 33.6%         | 23.6%         |               |
|   | Over \$500,000               | 0         | 0.0%          | 0.0%          | 0            | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>23</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,073</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 19        | 95.0%         |               | 583          | 61.8%         |               |               |
|   | \$100,001–\$250,000          | 0         | 0.0%          |               | 0            | 0.0%          |               |               |
|   | \$250,001–\$1 Million        | 1         | 5.0%          |               | 360          | 38.2%         |               |               |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0            | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>20</b> | <b>100.0%</b> |               | <b>943</b>   | <b>100.0%</b> |               |               |

## KANSAS CITY

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |              |               |                               |                     |               |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)    | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 3          | 6.4%          | 425          | 4.6%          | 5.7%                          | 3.3%                | 1.7%          |
| Moderate   | 6          | 12.8%         | 1,015        | 11.0%         | 18.0%                         | 17.4%               | 10.8%         |
| Middle   | 22         | 46.8%         | 3,643        | 39.5%         | 39.9%                         | 39.9%               | 35.2%         |
| Upper  | 16         | 34.0%         | 4,139        | 44.9%         | 36.2%                         | 39.2%               | 52.2%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.2%                          | 0.1%                | 0.1%          |
| <b>TOTAL</b>   | <b>47</b>  | <b>100.0%</b> | <b>9,222</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.7%                          | 1.7%                | 1.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.0%                         | 11.7%               | 7.3%          |
| Middle   | 11         | 78.6%         | 1,794        | 61.8%         | 39.9%                         | 38.2%               | 32.5%         |
| Upper  | 3          | 21.4%         | 1,110        | 38.2%         | 36.2%                         | 48.2%               | 59.0%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.2%                          | 0.1%                | 0.2%          |
| <b>TOTAL</b>   | <b>14</b>  | <b>100.0%</b> | <b>2,904</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.7%                          | 2.7%                | 1.9%          |
| Moderate   | 1          | 50.0%         | 120          | 44.9%         | 18.0%                         | 11.5%               | 8.4%          |
| Middle   | 1          | 50.0%         | 147          | 55.1%         | 39.9%                         | 35.0%               | 31.1%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 36.2%                         | 50.6%               | 58.5%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.2%                          | 0.2%                | 0.1%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>267</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 2          | 66.7%         | 313          | 55.2%         | 14.3%                         | 15.8%               | 8.5%          |
| Moderate   | 1          | 33.3%         | 254          | 44.8%         | 27.5%                         | 34.4%               | 22.1%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 36.3%                         | 33.7%               | 42.9%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 20.3%                         | 15.1%               | 26.3%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 1.5%                          | 1.0%                | 0.2%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>567</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.7%                          | 1.4%                | 1.1%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.0%                         | 10.4%               | 6.3%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 39.9%                         | 33.7%               | 27.9%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 36.2%                         | 54.4%               | 64.6%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.2%                          | 0.0%                | 0.1%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.7%                          | 3.6%                | 2.2%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.0%                         | 17.5%               | 10.8%         |
| Middle   | 1          | 50.0%         | 120          | 44.3%         | 39.9%                         | 37.9%               | 31.5%         |
| Upper  | 1          | 50.0%         | 151          | 55.7%         | 36.2%                         | 41.0%               | 55.5%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.2%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>271</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.7%                          | 6.3%                | 3.4%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.0%                         | 25.3%               | 17.7%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 39.9%                         | 46.2%               | 46.7%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 36.2%                         | 22.1%               | 32.2%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.2%                          | 0.1%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 5         | 7.4%          | 738           | 5.6%          | 5.7%          | 2.7%          | 2.0%          |
| Moderate                  | 8         | 11.8%         | 1,389         | 10.5%         | 18.0%         | 15.0%         | 10.4%         |
| Middle                    | 35        | 51.5%         | 5,704         | 43.1%         | 39.9%         | 38.9%         | 34.8%         |
| Upper                     | 20        | 29.4%         | 5,400         | 40.8%         | 36.2%         | 43.2%         | 52.7%         |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.2%          | 0.1%          | 0.2%          |
| <b>TOTAL</b>              | <b>68</b> | <b>100.0%</b> | <b>13,231</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |                |                               |                     |               |               |
|--|------------|---------------|----------------|-------------------------------|---------------------|---------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |               |
|  | #          | ##%           | \$ (000s)      |                               | \$ %                | # %           | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |                               |                     |               |               |
| Low  | 23         | 6.1%          | 2,090          | 2.6%                          | 5.7%                | 3.7%          | 1.9%          |
| Moderate   | 64         | 17.1%         | 9,056          | 11.2%                         | 18.0%               | 17.2%         | 10.9%         |
| Middle   | 141        | 37.7%         | 28,782         | 35.7%                         | 39.9%               | 38.9%         | 34.2%         |
| Upper  | 145        | 38.8%         | 40,263         | 50.0%                         | 36.2%               | 40.1%         | 52.8%         |
| Unknown  | 1          | 0.3%          | 360            | 0.4%                          | 0.2%                | 0.2%          | 0.2%          |
| <b>TOTAL</b>   | <b>374</b> | <b>100.0%</b> | <b>80,551</b>  | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |                               |                     |               |               |
| Low  | 6          | 1.0%          | 1,043          | 0.8%                          | 5.7%                | 1.2%          | 0.7%          |
| Moderate   | 49         | 8.3%          | 7,214          | 5.4%                          | 18.0%               | 9.6%          | 5.9%          |
| Middle   | 259        | 44.1%         | 52,042         | 39.2%                         | 39.9%               | 35.4%         | 29.8%         |
| Upper  | 273        | 46.5%         | 72,529         | 54.6%                         | 36.2%               | 53.7%         | 63.5%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%                          | 0.2%                | 0.1%          | 0.1%          |
| <b>TOTAL</b>   | <b>587</b> | <b>100.0%</b> | <b>132,828</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |                               |                     |               |               |
| Low  | 1          | 7.7%          | 33             | 2.4%                          | 5.7%                | 2.5%          | 1.7%          |
| Moderate   | 4          | 30.8%         | 307            | 22.7%                         | 18.0%               | 9.8%          | 6.7%          |
| Middle   | 5          | 38.5%         | 300            | 22.2%                         | 39.9%               | 33.7%         | 30.5%         |
| Upper  | 3          | 23.1%         | 714            | 52.7%                         | 36.2%               | 54.0%         | 61.1%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%                          | 0.2%                | 0.1%          | 0.1%          |
| <b>TOTAL</b>   | <b>13</b>  | <b>100.0%</b> | <b>1,354</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |                               |                     |               |               |
| Low  | 2          | 13.3%         | 2,434          | 5.0%                          | 14.3%               | 17.0%         | 14.3%         |
| Moderate   | 6          | 40.0%         | 11,612         | 23.7%                         | 27.5%               | 32.2%         | 15.1%         |
| Middle   | 6          | 40.0%         | 34,364         | 70.2%                         | 36.3%               | 33.8%         | 50.3%         |
| Upper  | 1          | 6.7%          | 573            | 1.2%                          | 20.3%               | 16.8%         | 20.2%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%                          | 1.5%                | 0.3%          | 0.1%          |
| <b>TOTAL</b>   | <b>15</b>  | <b>100.0%</b> | <b>48,983</b>  | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |                               |                     |               |               |
| Low  | 0          | 0.0%          | 0              | 0.0%                          | 5.7%                | 1.4%          | 0.7%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%                          | 18.0%               | 10.8%         | 6.3%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%                          | 39.9%               | 33.2%         | 27.1%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%                          | 36.2%               | 54.4%         | 65.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%                          | 0.2%                | 0.2%          | 0.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>                   | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |                |                               |                     |               |               |
| Low  | 0          | 0.0%          | 0              | 0.0%                          | 5.7%                | 3.8%          | 2.0%          |
| Moderate   | 1          | 14.3%         | 90             | 5.4%                          | 18.0%               | 13.2%         | 6.0%          |
| Middle   | 2          | 28.6%         | 155            | 9.3%                          | 39.9%               | 38.4%         | 26.9%         |
| Upper  | 4          | 57.1%         | 1,430          | 85.4%                         | 36.2%               | 44.5%         | 65.0%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%                          | 0.2%                | 0.1%          | 0.1%          |
| <b>TOTAL</b>   | <b>7</b>   | <b>100.0%</b> | <b>1,675</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> | <b>100.0%</b> |



## Appendix C (continued)

| Purpose Not Applicable    |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0              | 0.0%          | 5.7%          | 4.4%          | 2.3%          |
| Moderate                  | 0          | 0.0%          | 0              | 0.0%          | 18.0%         | 24.1%         | 15.9%         |
| Middle                    | 0          | 0.0%          | 0              | 0.0%          | 39.9%         | 44.5%         | 44.0%         |
| Upper                     | 0          | 0.0%          | 0              | 0.0%          | 36.2%         | 27.0%         | 37.8%         |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.2%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |                |               |               |               |               |
| Low                       | 32         | 3.2%          | 5,600          | 2.1%          | 5.7%          | 2.3%          | 1.8%          |
| Moderate                  | 124        | 12.4%         | 28,279         | 10.7%         | 18.0%         | 12.8%         | 8.3%          |
| Middle                    | 413        | 41.5%         | 115,643        | 43.6%         | 39.9%         | 36.8%         | 32.5%         |
| Upper                     | 426        | 42.8%         | 115,509        | 43.5%         | 36.2%         | 48.0%         | 57.2%         |
| Unknown                   | 1          | 0.1%          | 360            | 0.1%          | 0.2%          | 0.1%          | 0.2%          |
| <b>TOTAL</b>              | <b>996</b> | <b>100.0%</b> | <b>265,391</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |              |               |                 |                        |               |
|---|---------------------------|---------------|--------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |              |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)    | \$ %          |                 | %                      | \$ %          |
| Low   | 3                         | 3.9%          | 931          | 16.4%         | 7.0%            | 6.5%                   | 8.6%          |
| Moderate  | 9                         | 11.8%         | 927          | 16.4%         | 20.1%           | 18.1%                  | 19.2%         |
| Middle  | 54                        | 71.1%         | 2,861        | 50.5%         | 35.7%           | 32.3%                  | 29.3%         |
| Upper   | 10                        | 13.2%         | 944          | 16.7%         | 35.5%           | 39.6%                  | 36.8%         |
| Unknown   | 0                         | 0.0%          | 0            | 0.0%          | 1.8%            | 3.6%                   | 6.1%          |
| <b>TOTAL</b>  | <b>76</b>                 | <b>100.0%</b> | <b>5,663</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |                |               |                    |                        |               |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)      | \$ %          |                    | %                      | \$ %          |
| Low   | 142                       | 4.1%          | 25,002         | 6.5%          | 7.0%               | 6.5%                   | 8.3%          |
| Moderate  | 789                       | 22.8%         | 98,216         | 25.6%         | 20.2%              | 18.9%                  | 20.0%         |
| Middle  | 1,321                     | 38.2%         | 122,203        | 31.9%         | 35.5%              | 32.4%                  | 29.8%         |
| Upper   | 1,169                     | 33.8%         | 126,023        | 32.9%         | 35.5%              | 39.5%                  | 36.1%         |
| Unknown   | 40                        | 1.2%          | 11,541         | 3.0%          | 1.8%               | 2.7%                   | 5.8%          |
| <b>TOTAL</b>  | <b>3,461</b>              | <b>100.0%</b> | <b>382,985</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |              |               |               |                        |               |
|---|-----------------------|---------------|--------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |              |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %             | \$ (000s)    | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0            | 0.0%          | 1.4%          | 1.2%                   | 0.3%          |
| Moderate  | 20                    | 17.5%         | 1,396        | 21.2%         | 12.4%         | 11.9%                  | 12.5%         |
| Middle  | 91                    | 79.8%         | 4,942        | 75.1%         | 57.8%         | 63.4%                  | 60.7%         |
| Upper   | 3                     | 2.6%          | 245          | 3.7%          | 28.3%         | 22.3%                  | 26.3%         |
| Unknown   | 0                     | 0.0%          | 0            | 0.0%          | 0.1%          | 1.2%                   | 0.2%          |
| <b>TOTAL</b>  | <b>114</b>            | <b>100.0%</b> | <b>6,583</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |               |               |               |               |                        |               |
|---|-----------------------|---------------|---------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |               |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %             | \$ (000s)     | \$ %          |               | # %                    | \$ %          |
| Low   | 1                     | 0.5%          | 17            | 0.1%          | 1.3%          | 0.8%                   | 0.4%          |
| Moderate  | 21                    | 10.1%         | 1,190         | 7.9%          | 12.2%         | 10.6%                  | 9.3%          |
| Middle  | 160                   | 76.9%         | 11,915        | 78.9%         | 58.1%         | 66.5%                  | 64.7%         |
| Upper   | 26                    | 12.5%         | 1,980         | 13.1%         | 28.4%         | 22.0%                  | 25.6%         |
| Unknown   | 0                     | 0.0%          | 0             | 0.0%          | 0.1%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>208</b>            | <b>100.0%</b> | <b>15,102</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |              |               |                                   |                     |               |
|--|------------|---------------|--------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)    | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 4          | 8.5%          | 599          | 6.5%          | 21.3%                             | 9.7%                | 5.0%          |
| Moderate   | 10         | 21.3%         | 1,736        | 18.8%         | 17.6%                             | 21.9%               | 16.1%         |
| Middle   | 5          | 10.6%         | 859          | 9.3%          | 20.4%                             | 22.8%               | 21.5%         |
| Upper  | 22         | 46.8%         | 5,157        | 55.9%         | 40.8%                             | 33.7%               | 46.1%         |
| Unknown  | 6          | 12.8%         | 870          | 9.4%          | 0.0%                              | 11.9%               | 11.2%         |
| <b>TOTAL</b>   | <b>47</b>  | <b>100.0%</b> | <b>9,222</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                                   |                     |               |
| Low  | 2          | 14.3%         | 100          | 3.4%          | 21.3%                             | 6.8%                | 3.4%          |
| Moderate   | 2          | 14.3%         | 384          | 13.2%         | 17.6%                             | 15.4%               | 10.4%         |
| Middle   | 5          | 35.7%         | 682          | 23.5%         | 20.4%                             | 21.1%               | 18.3%         |
| Upper  | 5          | 35.7%         | 1,738        | 59.8%         | 40.8%                             | 38.5%               | 49.5%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 18.2%               | 18.3%         |
| <b>TOTAL</b>   | <b>14</b>  | <b>100.0%</b> | <b>2,904</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.3%                             | 6.3%                | 4.4%          |
| Moderate   | 1          | 50.0%         | 120          | 44.9%         | 17.6%                             | 13.4%               | 10.8%         |
| Middle   | 1          | 50.0%         | 147          | 55.1%         | 20.4%                             | 21.2%               | 18.1%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 40.8%                             | 53.8%               | 59.7%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 5.1%                | 7.1%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>267</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.3%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.6%                             | 0.5%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.4%                             | 0.8%                | 0.2%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 40.8%                             | 3.6%                | 1.0%          |
| Unknown  | 3          | 100.0%        | 567          | 100.0%        | 0.0%                              | 95.2%               | 98.9%         |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>567</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.3%                             | 4.9%                | 2.9%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.6%                             | 13.6%               | 9.0%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.4%                             | 22.5%               | 16.5%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 40.8%                             | 56.0%               | 68.5%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 3.0%                | 3.1%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.3%                             | 10.8%               | 7.7%          |
| Moderate   | 1          | 50.0%         | 120          | 44.3%         | 17.6%                             | 17.0%               | 11.1%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.4%                             | 22.8%               | 17.5%         |
| Upper  | 1          | 50.0%         | 151          | 55.7%         | 40.8%                             | 43.7%               | 55.8%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 5.7%                | 7.9%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>271</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.3%                             | 0.4%                | 0.2%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.6%                             | 1.0%                | 0.9%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.4%                             | 0.9%                | 1.3%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 40.8%                             | 1.7%                | 4.8%          |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 96.1%               | 92.7%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 6         | 8.8%          | 699           | 5.3%          | 21.3%         | 8.2%          | 4.0%          |
| Moderate                  | 14        | 20.6%         | 2,360         | 17.8%         | 17.6%         | 18.4%         | 12.5%         |
| Middle                    | 11        | 16.2%         | 1,688         | 12.8%         | 20.4%         | 21.7%         | 18.4%         |
| Upper                     | 28        | 41.2%         | 7,046         | 53.3%         | 40.8%         | 36.6%         | 43.9%         |
| Unknown                   | 9         | 13.2%         | 1,437         | 10.9%         | 0.0%          | 15.1%         | 21.1%         |
| <b>TOTAL</b>              | <b>68</b> | <b>100.0%</b> | <b>13,231</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |                |               |                                   |                     |               |
|--|------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$             | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 48         | 12.8%         | 5,524          | 6.9%          | 21.3%                             | 10.1%               | 5.3%          |
| Moderate   | 58         | 15.5%         | 9,052          | 11.2%         | 17.6%                             | 23.1%               | 17.5%         |
| Middle   | 77         | 20.6%         | 16,762         | 20.8%         | 20.4%                             | 22.3%               | 21.8%         |
| Upper  | 147        | 39.3%         | 40,906         | 50.8%         | 40.8%                             | 32.0%               | 44.0%         |
| Unknown  | 44         | 11.8%         | 8,307          | 10.3%         | 0.0%                              | 12.5%               | 11.4%         |
| <b>TOTAL</b>   | <b>374</b> | <b>100.0%</b> | <b>80,551</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                                   |                     |               |
| Low  | 37         | 6.3%          | 4,444          | 3.3%          | 21.3%                             | 4.4%                | 2.2%          |
| Moderate   | 86         | 14.7%         | 14,420         | 10.9%         | 17.6%                             | 15.0%               | 10.3%         |
| Middle   | 149        | 25.4%         | 28,821         | 21.7%         | 20.4%                             | 21.2%               | 18.5%         |
| Upper  | 228        | 38.8%         | 62,362         | 46.9%         | 40.8%                             | 40.9%               | 50.4%         |
| Unknown  | 87         | 14.8%         | 22,781         | 17.2%         | 0.0%                              | 18.4%               | 18.6%         |
| <b>TOTAL</b>   | <b>587</b> | <b>100.0%</b> | <b>132,828</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                                   |                     |               |
| Low  | 2          | 15.4%         | 155            | 11.4%         | 21.3%                             | 5.9%                | 3.6%          |
| Moderate   | 2          | 15.4%         | 220            | 16.2%         | 17.6%                             | 12.0%               | 8.8%          |
| Middle   | 2          | 15.4%         | 40             | 3.0%          | 20.4%                             | 21.5%               | 17.8%         |
| Upper  | 2          | 15.4%         | 214            | 15.8%         | 40.8%                             | 55.7%               | 63.0%         |
| Unknown  | 5          | 38.5%         | 725            | 53.5%         | 0.0%                              | 4.8%                | 6.8%          |
| <b>TOTAL</b>   | <b>13</b>  | <b>100.0%</b> | <b>1,354</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.3%                             | 0.3%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 17.6%                             | 2.0%                | 0.1%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.4%                             | 0.3%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 40.8%                             | 5.8%                | 0.5%          |
| Unknown  | 15         | 100.0%        | 48,983         | 100.0%        | 0.0%                              | 91.6%               | 99.3%         |
| <b>TOTAL</b>   | <b>15</b>  | <b>100.0%</b> | <b>48,983</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.3%                             | 4.2%                | 2.3%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 17.6%                             | 15.1%               | 9.5%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 20.4%                             | 21.6%               | 16.2%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 40.8%                             | 56.5%               | 69.2%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 2.6%                | 2.9%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |                |               |                                   |                     |               |
| Low  | 1          | 14.3%         | 90             | 5.4%          | 21.3%                             | 8.1%                | 3.4%          |
| Moderate   | 1          | 14.3%         | 35             | 2.1%          | 17.6%                             | 18.4%               | 11.4%         |
| Middle   | 3          | 42.9%         | 540            | 32.2%         | 20.4%                             | 22.8%               | 17.4%         |
| Upper  | 2          | 28.6%         | 1,010          | 60.3%         | 40.8%                             | 45.2%               | 62.2%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 5.5%                | 5.7%          |
| <b>TOTAL</b>   | <b>7</b>   | <b>100.0%</b> | <b>1,675</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0              | 0.0%          | 21.3%         | 0.1%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0              | 0.0%          | 17.6%         | 0.0%          | 0.0%          |
| Middle                    | 0          | 0.0%          | 0              | 0.0%          | 20.4%         | 0.0%          | 0.0%          |
| Upper                     | 0          | 0.0%          | 0              | 0.0%          | 40.8%         | 0.0%          | 0.0%          |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.0%          | 99.8%         | 100.0%        |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |                |               |               |               |               |
| Low                       | 88         | 8.8%          | 10,213         | 3.8%          | 21.3%         | 6.5%          | 3.2%          |
| Moderate                  | 147        | 14.8%         | 23,727         | 8.9%          | 17.6%         | 17.6%         | 12.3%         |
| Middle                    | 231        | 23.2%         | 46,163         | 17.4%         | 20.4%         | 21.2%         | 18.7%         |
| Upper                     | 379        | 38.1%         | 104,492        | 39.4%         | 40.8%         | 37.4%         | 45.5%         |
| Unknown                   | 151        | 15.2%         | 80,796         | 30.4%         | 0.0%          | 17.4%         | 20.3%         |
| <b>TOTAL</b>              | <b>996</b> | <b>100.0%</b> | <b>265,391</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |           |               |               |              |               |               |                       |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------|-----------------------|
| Business Revenue and Loan Size  |                              | Count     |               |               | Dollars      |               |               | Total Businesses<br>% |
|   |                              | Bank      |               | Aggregate     | Bank         |               | Aggregate     |                       |
|   |                              | #         | %             | %             | \$ (000s)    | \$ %          | \$ %          |                       |
| Business<br>Revenue   | \$1 Million or Less          | 62        | 81.6%         | 46.2%         | 4,279        | 75.6%         | 31.9%         | 90.2%                 |
|   | Over \$1 Million/<br>Unknown | 14        | 18.4%         | 53.8%         | 1,384        | 24.4%         | 68.1%         | 9.8%                  |
|   | <b>TOTAL</b>                 | <b>76</b> | <b>100.0%</b> | <b>100.0%</b> | <b>5,663</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>         |
| Loan Size   | \$100,000 or Less            | 61        | 80.3%         | 91.5%         | 2,061        | 36.4%         | 28.9%         |                       |
|   | \$100,001–\$250,000          | 12        | 15.8%         | 3.9%          | 2,517        | 44.4%         | 14.8%         |                       |
|   | \$250,001–\$1 Million        | 3         | 3.9%          | 4.7%          | 1,085        | 19.2%         | 56.3%         |                       |
|   | Over \$1 Million             | 0         | 0.0%          | 0.0%          | 0            | 0.0%          | 0.0%          |                       |
|   | <b>TOTAL</b>                 | <b>76</b> | <b>100.0%</b> | <b>100.0%</b> | <b>5,663</b> | <b>100.0%</b> | <b>100.0%</b> |                       |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 51        | 82.3%         |               | 1,501        | 35.1%         |               |                       |
|   | \$100,001–\$250,000          | 8         | 12.9%         |               | 1,693        | 39.6%         |               |                       |
|   | \$250,001–\$1 Million        | 3         | 4.8%          |               | 1,085        | 25.4%         |               |                       |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0            | 0.0%          |               |                       |
|   | <b>TOTAL</b>                 | <b>62</b> | <b>100.0%</b> |               | <b>4,279</b> | <b>100.0%</b> |               |                       |

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |             |               |               |                |               |               |                          |
|---|------------------------------|-------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count       |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank        |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #           | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 763         | 22.0%         | 37.4%         | 91,041         | 23.8%         | 21.6%         | 90.4%                    |
|   | Over \$1 Million/<br>Unknown | 2698        | 78.0%         | 62.6%         | 291,944        | 76.2%         | 78.4%         | 9.6%                     |
|   | <b>TOTAL</b>                 | <b>3461</b> | <b>100.0%</b> | <b>100.0%</b> | <b>382,985</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 2484        | 71.8%         | 84.0%         | 77,795         | 20.3%         | 24.6%         |                          |
|   | \$100,001–\$250,000          | 557         | 16.1%         | 8.4%          | 92,674         | 24.2%         | 19.2%         |                          |
|   | \$250,001–\$1 Million        | 420         | 12.1%         | 7.7%          | 212,516        | 55.5%         | 56.3%         |                          |
|   | Over \$1 Million             | 0           | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>3461</b> | <b>100.0%</b> | <b>100.0%</b> | <b>382,985</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 521         | 68.3%         |               | 18,434         | 20.2%         |               |                          |
|   | \$100,001–\$250,000          | 142         | 18.6%         |               | 24,064         | 26.4%         |               |                          |
|   | \$250,001–\$1 Million        | 100         | 13.1%         |               | 48,543         | 53.3%         |               |                          |
|   | Over \$1 Million             | 0           | 0.0%          |               | 0              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>763</b>  | <b>100.0%</b> |               | <b>91,041</b>  | <b>100.0%</b> |               |                          |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |                 |               |               |              |               |               |               |
|---|------------------------------|-----------------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count           |               |               | Dollars      |               |               | Farms<br>%    |
|   |                              | Bank            |               | Aggregate     | Bank         |               | Aggregate     |               |
|   |                              | #               | %             | %             | \$<br>(000s) | \$ %          | \$ %          |               |
| Farm Revenue  | \$1 Million or Less          | 10<br>7         | 93.9%         | 57.5%         | 5,727        | 87.0%         | 77.5%         | 98.8%         |
|   | Over \$1 Million/<br>Unknown | 7               | 6.1%          | 42.5%         | 856          | 13.0%         | 22.5%         | 1.2%          |
|   | <b>TOTAL</b>                 | <b>11<br/>4</b> | <b>100.0%</b> | <b>100.0%</b> | <b>6,583</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 99              | 86.8%         | 85.2%         | 3,264        | 49.6%         | 34.1%         |               |
|   | \$100,001–\$250,000          | 11              | 9.6%          | 9.8%          | 1,769        | 26.9%         | 31.9%         |               |
|   | \$250,001–\$500,000          | 4               | 3.5%          | 5.0%          | 1,550        | 23.5%         | 34.1%         |               |
|   | Over \$500,000               | 0               | 0.0%          | 0.0%          | 0            | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>11<br/>4</b> | <b>100.0%</b> | <b>100.0%</b> | <b>6,583</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 95              | 88.8%         |               | 3,083        | 53.8%         |               |               |
|   | \$100,001–\$250,000          | 9               | 8.4%          |               | 1,444        | 25.2%         |               |               |
|   | \$250,001–\$1 Million        | 3               | 2.8%          |               | 1,200        | 21.0%         |               |               |
|   | Over \$1 Million             | 0               | 0.0%          |               | 0            | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>10<br/>7</b> | <b>100.0%</b> |               | <b>5,727</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |               |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Farms         |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     | %             |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 154        | 74.0%         | 56.6%         | 11,491        | 76.1%         | 68.7%         | 97.6%         |
|   | Over \$1 Million/<br>Unknown | 54         | 26.0%         | 43.4%         | 3,611         | 23.9%         | 31.3%         | 2.4%          |
|   | <b>TOTAL</b>                 | <b>208</b> | <b>100.0%</b> | <b>100.0%</b> | <b>15,102</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 161        | 77.4%         | 78.4%         | 5,337         | 35.3%         | 28.7%         |               |
|   | \$100,001–\$250,000          | 36         | 17.3%         | 15.1%         | 5,669         | 37.5%         | 37.8%         |               |
|   | \$250,001–\$500,000          | 11         | 5.3%          | 6.6%          | 4,096         | 27.1%         | 33.5%         |               |
|   | Over \$500,000               | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>208</b> | <b>100.0%</b> | <b>100.0%</b> | <b>15,102</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 120        | 77.9%         |               | 4,089         | 35.6%         |               |               |
|   | \$100,001–\$250,000          | 25         | 16.2%         |               | 3,936         | 34.3%         |               |               |
|   | \$250,001–\$1 Million        | 9          | 5.8%          |               | 3,466         | 30.2%         |               |               |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>154</b> | <b>100.0%</b> |               | <b>11,491</b> | <b>100.0%</b> |               |               |

## ST. LOUIS

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |                |               |                                  |                     |               |
|--|------------|---------------|----------------|---------------|----------------------------------|---------------------|---------------|
| Census<br>Tract<br>Income<br>Level   | Bank Loans |               |                |               | % of Owner-<br>Occupied<br>Units | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)      | \$ %          |                                  | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                                  |                     |               |
| Low  | 12         | 2.0%          | 1,004          | 0.7%          | 6.4%                             | 2.4%                | 1.1%          |
| Moderate   | 93         | 15.2%         | 14,527         | 10.0%         | 15.4%                            | 13.2%               | 7.4%          |
| Middle   | 171        | 28.0%         | 30,485         | 21.0%         | 33.8%                            | 36.7%               | 30.5%         |
| Upper  | 333        | 54.5%         | 98,797         | 68.1%         | 44.2%                            | 47.5%               | 60.8%         |
| Unknown  | 2          | 0.3%          | 343            | 0.2%          | 0.2%                             | 0.2%                | 0.2%          |
| <b>TOTAL</b>   | <b>611</b> | <b>100.0%</b> | <b>145,156</b> | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                                  |                     |               |
| Low  | 3          | 0.9%          | 335            | 0.3%          | 6.4%                             | 1.1%                | 0.5%          |
| Moderate   | 12         | 3.4%          | 1,902          | 1.9%          | 15.4%                            | 6.8%                | 3.6%          |
| Middle   | 87         | 24.7%         | 17,446         | 17.7%         | 33.8%                            | 31.4%               | 24.4%         |
| Upper  | 249        | 70.7%         | 78,459         | 79.8%         | 44.2%                            | 60.5%               | 71.4%         |
| Unknown  | 1          | 0.3%          | 238            | 0.2%          | 0.2%                             | 0.1%                | 0.1%          |
| <b>TOTAL</b>   | <b>352</b> | <b>100.0%</b> | <b>98,380</b>  | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                                  |                     |               |
| Low  | 1          | 33.3%         | 60             | 18.7%         | 6.4%                             | 1.9%                | 1.2%          |
| Moderate   | 1          | 33.3%         | 72             | 22.4%         | 15.4%                            | 9.0%                | 5.3%          |
| Middle   | 1          | 33.3%         | 189            | 58.9%         | 33.8%                            | 32.0%               | 27.0%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 44.2%                            | 56.9%               | 66.1%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.2%                | 0.4%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>321</b>     | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                                  |                     |               |
| Low  | 1          | 10.0%         | 15             | 0.4%          | 14.3%                            | 16.0%               | 3.2%          |
| Moderate   | 5          | 50.0%         | 1,832          | 43.9%         | 19.7%                            | 35.1%               | 22.2%         |
| Middle   | 3          | 30.0%         | 763            | 18.3%         | 34.0%                            | 30.5%               | 43.0%         |
| Upper  | 1          | 10.0%         | 1,562          | 37.4%         | 31.0%                            | 18.1%               | 29.9%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 1.0%                             | 0.2%                | 1.7%          |
| <b>TOTAL</b>   | <b>10</b>  | <b>100.0%</b> | <b>4,172</b>   | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 6.4%                             | 0.9%                | 0.4%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 15.4%                            | 5.9%                | 3.1%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 33.8%                            | 30.3%               | 22.7%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 44.2%                            | 62.8%               | 73.7%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.1%                | 0.2%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |                |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 6.4%                             | 1.9%                | 0.9%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 15.4%                            | 10.5%               | 5.8%          |
| Middle   | 2          | 16.7%         | 105            | 6.1%          | 33.8%                            | 32.4%               | 21.7%         |
| Upper  | 10         | 83.3%         | 1,608          | 93.9%         | 44.2%                            | 55.0%               | 71.2%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.2%                | 0.3%          |
| <b>TOTAL</b>   | <b>12</b>  | <b>100.0%</b> | <b>1,713</b>   | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |                |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 6.4%                             | 8.5%                | 4.3%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 15.4%                            | 27.1%               | 25.6%         |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 33.8%                            | 36.9%               | 31.5%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 44.2%                            | 27.5%               | 38.6%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.1%                | 0.1%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 17         | 1.7%          | 1,414          | 0.6%          | 6.4%          | 2.0%          | 1.0%          |
| Moderate                  | 111        | 11.2%         | 18,333         | 7.3%          | 15.4%         | 10.5%         | 6.6%          |
| Middle                    | 264        | 26.7%         | 48,988         | 19.6%         | 33.8%         | 34.1%         | 28.3%         |
| Upper                     | 593        | 60.0%         | 180,426        | 72.2%         | 44.2%         | 53.3%         | 64.0%         |
| Unknown                   | 3          | 0.3%          | 581            | 0.2%          | 0.2%          | 0.1%          | 0.2%          |
| <b>TOTAL</b>              | <b>988</b> | <b>100.0%</b> | <b>249,742</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |              |               |                |               |                                  |                     |               |
|--|--------------|---------------|----------------|---------------|----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans   |               |                |               | % of Owner-<br>Occupied<br>Units | Aggregate HMDA Data |               |
|  | #            | ##%           | \$ (000s)      | \$ %          |                                  | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |              |               |                |               |                                  |                     |               |
| Low  | 12           | 1.5%          | 1,779          | 0.8%          | 6.4%                             | 2.5%                | 1.2%          |
| Moderate   | 69           | 8.9%          | 10,942         | 5.2%          | 15.4%                            | 13.0%               | 7.4%          |
| Middle   | 208          | 26.7%         | 44,317         | 21.1%         | 33.8%                            | 37.3%               | 31.6%         |
| Upper  | 485          | 62.3%         | 151,750        | 72.3%         | 44.2%                            | 47.0%               | 59.5%         |
| Unknown  | 4            | 0.5%          | 1,010          | 0.5%          | 0.2%                             | 0.2%                | 0.3%          |
| <b>TOTAL</b>   | <b>778</b>   | <b>100.0%</b> | <b>209,798</b> | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |              |               |                |               |                                  |                     |               |
| Low  | 5            | 0.4%          | 745            | 0.2%          | 6.4%                             | 0.7%                | 0.4%          |
| Moderate   | 64           | 4.7%          | 10,879         | 3.2%          | 15.4%                            | 5.7%                | 3.3%          |
| Middle   | 313          | 23.2%         | 66,900         | 19.7%         | 33.8%                            | 30.9%               | 24.9%         |
| Upper  | 970          | 71.7%         | 260,935        | 76.9%         | 44.2%                            | 62.5%               | 71.3%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.1%                | 0.2%          |
| <b>TOTAL</b>   | <b>1,352</b> | <b>100.0%</b> | <b>339,459</b> | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |              |               |                |               |                                  |                     |               |
| Low  | 1            | 12.5%         | 196            | 20.7%         | 6.4%                             | 1.7%                | 1.1%          |
| Moderate   | 1            | 12.5%         | 20             | 2.1%          | 15.4%                            | 7.0%                | 4.2%          |
| Middle   | 2            | 25.0%         | 230            | 24.3%         | 33.8%                            | 29.2%               | 24.6%         |
| Upper  | 4            | 50.0%         | 500            | 52.9%         | 44.2%                            | 62.1%               | 70.0%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.1%                | 0.0%          |
| <b>TOTAL</b>   | <b>8</b>     | <b>100.0%</b> | <b>946</b>     | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |              |               |                |               |                                  |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 14.3%                            | 17.2%               | 4.1%          |
| Moderate   | 5            | 50.0%         | 2,226          | 37.5%         | 19.7%                            | 29.4%               | 14.7%         |
| Middle   | 3            | 30.0%         | 1,681          | 28.3%         | 34.0%                            | 30.8%               | 26.2%         |
| Upper  | 2            | 20.0%         | 2,031          | 34.2%         | 31.0%                            | 22.1%               | 51.8%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 1.0%                             | 0.5%                | 3.1%          |
| <b>TOTAL</b>   | <b>10</b>    | <b>100.0%</b> | <b>5,938</b>   | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |              |               |                |               |                                  |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 6.4%                             | 0.7%                | 0.3%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 15.4%                            | 5.5%                | 3.2%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 33.8%                            | 28.1%               | 19.6%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 44.2%                            | 65.7%               | 77.0%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |              |               |                |               |                                  |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 6.4%                             | 2.1%                | 0.7%          |
| Moderate   | 1            | 20.0%         | 45             | 6.4%          | 15.4%                            | 11.7%               | 5.2%          |
| Middle   | 1            | 20.0%         | 37             | 5.3%          | 33.8%                            | 33.4%               | 21.9%         |
| Upper  | 3            | 60.0%         | 617            | 88.3%         | 44.2%                            | 52.7%               | 72.1%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.1%                | 0.0%          |
| <b>TOTAL</b>   | <b>5</b>     | <b>100.0%</b> | <b>699</b>     | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |              |               |                |               |                                  |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 6.4%                             | 5.7%                | 3.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 15.4%                            | 23.4%               | 14.7%         |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 33.8%                            | 41.6%               | 39.6%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 44.2%                            | 29.3%               | 42.6%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.2%                             | 0.1%                | 0.1%          |



## Appendix C (continued)

| TOTAL                            | 0            | 0.0%          | 0              | 0.0%          | 100.0%        | 100.0%        | 100.0%        |
|----------------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| <b>Total Home Mortgage Loans</b> |              |               |                |               |               |               |               |
| Low                              | 18           | 0.8%          | 2,720          | 0.5%          | 6.4%          | 1.5%          | 0.8%          |
| Moderate                         | 140          | 6.5%          | 24,112         | 4.3%          | 15.4%         | 8.5%          | 5.0%          |
| Middle                           | 527          | 24.5%         | 113,165        | 20.3%         | 33.8%         | 33.1%         | 27.2%         |
| Upper                            | 1,464        | 68.0%         | 415,833        | 74.7%         | 44.2%         | 56.7%         | 66.8%         |
| Unknown                          | 4            | 0.2%          | 1,010          | 0.2%          | 0.2%          | 0.2%          | 0.3%          |
| <b>TOTAL</b>                     | <b>2,153</b> | <b>100.0%</b> | <b>556,840</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| <b>Distribution of 2019 Small Business Lending<br/>By Income Level of Geography</b> |                           |               |                |               |                 |                        |               |
|---|---------------------------|---------------|----------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | #%            | \$ (000s)      | \$ %          |                 | %                      | \$ %          |
| Low   | 57                        | 10.1%         | 9,868          | 8.9%          | 6.9%            | 6.1%                   | 7.1%          |
| Moderate  | 97                        | 17.2%         | 13,575         | 12.2%         | 16.5%           | 15.8%                  | 16.3%         |
| Middle  | 120                       | 21.2%         | 23,002         | 20.7%         | 30.1%           | 29.3%                  | 27.9%         |
| Upper   | 277                       | 49.0%         | 58,554         | 52.8%         | 45.4%           | 47.1%                  | 45.6%         |
| Unknown   | 14                        | 2.5%          | 5,993          | 5.4%          | 1.1%            | 1.7%                   | 3.1%          |
| <b>TOTAL</b>  | <b>565</b>                | <b>100.0%</b> | <b>110,992</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| <b>Distribution of 2020 Small Business Lending<br/>By Income Level of Geography</b> |                           |               |                |               |                    |                        |               |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |                |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | #%            | \$ (000s)      | \$ %          |                    | %                      | \$ %          |
| Low   | 88                        | 5.8%          | 11,808         | 5.6%          | 7.1%               | 6.2%                   | 6.4%          |
| Moderate  | 189                       | 12.4%         | 28,707         | 13.6%         | 16.7%              | 15.5%                  | 16.5%         |
| Middle  | 326                       | 21.4%         | 41,737         | 19.8%         | 30.1%              | 29.2%                  | 28.6%         |
| Upper   | 904                       | 59.3%         | 123,105        | 58.3%         | 45.1%              | 47.7%                  | 46.0%         |
| Unknown   | 17                        | 1.1%          | 5,888          | 2.8%          | 1.1%               | 1.3%                   | 2.5%          |
| <b>TOTAL</b>  | <b>1,524</b>              | <b>100.0%</b> | <b>211,245</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| <b>Distribution of 2019 Small Farm Lending<br/>By Income Level of Geography</b> |                       |               |              |               |               |                        |               |
|---|-----------------------|---------------|--------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |              |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | #%            | \$ (000s)    | \$ %          |               | #%                     | \$ %          |
| Low   | 0                     | 0.0%          | 0            | 0.0%          | 2.1%          | 1.6%                   | 0.5%          |
| Moderate  | 0                     | 0.0%          | 0            | 0.0%          | 6.4%          | 3.3%                   | 0.6%          |
| Middle  | 5                     | 55.6%         | 630          | 40.0%         | 41.7%         | 45.1%                  | 57.4%         |
| Upper   | 4                     | 44.4%         | 945          | 60.0%         | 49.4%         | 48.1%                  | 41.1%         |
| Unknown   | 0                     | 0.0%          | 0            | 0.0%          | 0.3%          | 1.9%                   | 0.4%          |
| <b>TOTAL</b>  | <b>9</b>              | <b>100.0%</b> | <b>1,575</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| <b>Distribution of 2020 Small Farm Lending<br/>By Income Level of Geography</b> |                       |               |           |               |               |                        |               |
|---|-----------------------|---------------|-----------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |           |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | #%            | \$ (000s) | \$ %          |               | #%                     | \$ %          |
| Low   | 0                     | 0.0%          | 0         | 0.0%          | 1.9%          | 1.9%                   | 0.2%          |
| Moderate  | 0                     | 0.0%          | 0         | 0.0%          | 7.2%          | 2.9%                   | 2.0%          |
| Middle  | 7                     | 63.6%         | 1         | 57.1%         | 42.2%         | 47.8%                  | 54.8%         |
| Upper   | 4                     | 36.4%         | 1         | 42.9%         | 48.4%         | 47.1%                  | 43.0%         |
| Unknown   | 0                     | 0.0%          | 0         | 0.0%          | 0.3%          | 0.3%                   | 0.0%          |
| <b>TOTAL</b>  | <b>11</b>             | <b>100.0%</b> | <b>2</b>  | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |                |               |                                   |                     |               |
|--|------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)      | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 67         | 11.0%         | 6,714          | 4.6%          | 21.6%                             | 9.6%                | 4.6%          |
| Moderate   | 108        | 17.7%         | 16,779         | 11.6%         | 16.2%                             | 20.1%               | 13.9%         |
| Middle   | 105        | 17.2%         | 21,367         | 14.7%         | 19.0%                             | 20.9%               | 19.0%         |
| Upper  | 305        | 49.9%         | 97,332         | 67.1%         | 43.2%                             | 33.7%               | 47.8%         |
| Unknown  | 26         | 4.3%          | 2,964          | 2.0%          | 0.0%                              | 15.8%               | 14.7%         |
| <b>TOTAL</b>   | <b>611</b> | <b>100.0%</b> | <b>145,156</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |                |               |                                   |                     |               |
| Low  | 18         | 5.1%          | 2,032          | 2.1%          | 21.6%                             | 5.5%                | 2.7%          |
| Moderate   | 36         | 10.2%         | 5,916          | 6.0%          | 16.2%                             | 14.0%               | 8.7%          |
| Middle   | 72         | 20.5%         | 15,803         | 16.1%         | 19.0%                             | 20.4%               | 16.4%         |
| Upper  | 198        | 56.3%         | 64,812         | 65.9%         | 43.2%                             | 42.6%               | 55.1%         |
| Unknown  | 28         | 8.0%          | 9,817          | 10.0%         | 0.0%                              | 17.6%               | 17.2%         |
| <b>TOTAL</b>   | <b>352</b> | <b>100.0%</b> | <b>98,380</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.6%                             | 7.9%                | 4.4%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.2%                             | 15.7%               | 11.2%         |
| Middle   | 1          | 33.3%         | 189            | 58.9%         | 19.0%                             | 22.0%               | 19.2%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 43.2%                             | 49.4%               | 58.7%         |
| Unknown  | 2          | 66.7%         | 132            | 41.1%         | 0.0%                              | 5.0%                | 6.5%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>321</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.6%                             | 0.5%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.2%                             | 0.2%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 19.0%                             | 0.7%                | 0.1%          |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 43.2%                             | 3.1%                | 0.6%          |
| Unknown  | 10         | 100.0%        | 4,172          | 100.0%        | 0.0%                              | 95.5%               | 99.2%         |
| <b>TOTAL</b>   | <b>10</b>  | <b>100.0%</b> | <b>4,172</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.6%                             | 7.8%                | 4.7%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.2%                             | 15.9%               | 10.5%         |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 19.0%                             | 22.2%               | 16.3%         |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 43.2%                             | 51.1%               | 65.5%         |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 3.0%                | 3.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.6%                             | 9.4%                | 4.9%          |
| Moderate   | 1          | 8.3%          | 35             | 2.0%          | 16.2%                             | 17.6%               | 11.3%         |
| Middle   | 2          | 16.7%         | 144            | 8.4%          | 19.0%                             | 20.8%               | 13.8%         |
| Upper  | 7          | 58.3%         | 1,264          | 73.8%         | 43.2%                             | 45.9%               | 61.6%         |
| Unknown  | 2          | 16.7%         | 270            | 15.8%         | 0.0%                              | 6.2%                | 8.5%          |
| <b>TOTAL</b>   | <b>12</b>  | <b>100.0%</b> | <b>1,713</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |                |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0              | 0.0%          | 21.6%                             | 0.2%                | 0.1%          |
| Moderate   | 0          | 0.0%          | 0              | 0.0%          | 16.2%                             | 0.3%                | 0.2%          |
| Middle   | 0          | 0.0%          | 0              | 0.0%          | 19.0%                             | 0.2%                | 0.1%          |
| Upper  | 0          | 0.0%          | 0              | 0.0%          | 43.2%                             | 0.6%                | 1.6%          |
| Unknown  | 0          | 0.0%          | 0              | 0.0%          | 0.0%                              | 98.7%               | 98.0%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 85         | 8.6%          | 8,746          | 3.5%          | 21.6%         | 7.6%          | 3.5%          |
| Moderate                  | 145        | 14.7%         | 22,730         | 9.1%          | 16.2%         | 16.8%         | 10.7%         |
| Middle                    | 180        | 18.2%         | 37,503         | 15.0%         | 19.0%         | 20.3%         | 16.7%         |
| Upper                     | 510        | 51.6%         | 163,408        | 65.4%         | 43.2%         | 37.9%         | 48.7%         |
| Unknown                   | 68         | 6.9%          | 17,355         | 6.9%          | 0.0%          | 17.3%         | 20.4%         |
| <b>TOTAL</b>              | <b>988</b> | <b>100.0%</b> | <b>249,742</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |              |               |                |               |                                   |                     |               |
|--|--------------|---------------|----------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans   |               |                |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #            | # %           | \$ (000s)      | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |              |               |                |               |                                   |                     |               |
| Low  | 38           | 4.9%          | 4,658          | 2.2%          | 21.6%                             | 9.9%                | 5.0%          |
| Moderate   | 173          | 22.2%         | 30,413         | 14.5%         | 16.2%                             | 21.7%               | 15.6%         |
| Middle   | 156          | 20.1%         | 35,124         | 16.7%         | 19.0%                             | 19.9%               | 18.4%         |
| Upper  | 358          | 46.0%         | 124,690        | 59.4%         | 43.2%                             | 33.2%               | 46.5%         |
| Unknown  | 53           | 6.8%          | 14,913         | 7.1%          | 0.0%                              | 15.2%               | 14.5%         |
| <b>TOTAL</b>   | <b>778</b>   | <b>100.0%</b> | <b>209,798</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |              |               |                |               |                                   |                     |               |
| Low  | 39           | 2.9%          | 4,588          | 1.4%          | 21.6%                             | 3.9%                | 1.8%          |
| Moderate   | 155          | 11.5%         | 24,913         | 7.3%          | 16.2%                             | 13.0%               | 8.4%          |
| Middle   | 284          | 21.0%         | 61,239         | 18.0%         | 19.0%                             | 19.5%               | 15.9%         |
| Upper  | 668          | 49.4%         | 193,780        | 57.1%         | 43.2%                             | 45.0%               | 55.5%         |
| Unknown  | 206          | 15.2%         | 54,939         | 16.2%         | 0.0%                              | 18.7%               | 18.3%         |
| <b>TOTAL</b>   | <b>1,352</b> | <b>100.0%</b> | <b>339,459</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 21.6%                             | 6.9%                | 3.8%          |
| Moderate   | 1            | 12.5%         | 20             | 2.1%          | 16.2%                             | 13.3%               | 9.8%          |
| Middle   | 1            | 12.5%         | 20             | 2.1%          | 19.0%                             | 21.1%               | 17.9%         |
| Upper  | 1            | 12.5%         | 250            | 26.4%         | 43.2%                             | 53.7%               | 60.7%         |
| Unknown  | 5            | 62.5%         | 656            | 69.3%         | 0.0%                              | 5.0%                | 7.8%          |
| <b>TOTAL</b>   | <b>8</b>     | <b>100.0%</b> | <b>946</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 21.6%                             | 0.0%                | 0.0%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 16.2%                             | 0.5%                | 0.0%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 19.0%                             | 0.2%                | 0.0%          |
| Upper  | 1            | 10.0%         | 806            | 13.6%         | 43.2%                             | 3.7%                | 0.7%          |
| Unknown  | 9            | 90.0%         | 5,132          | 86.4%         | 0.0%                              | 95.6%               | 99.2%         |
| <b>TOTAL</b>   | <b>10</b>    | <b>100.0%</b> | <b>5,938</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 21.6%                             | 7.1%                | 3.8%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 16.2%                             | 14.5%               | 9.7%          |
| Middle   | 0            | 0.0%          | 0              | 0.0%          | 19.0%                             | 19.0%               | 14.9%         |
| Upper  | 0            | 0.0%          | 0              | 0.0%          | 43.2%                             | 55.9%               | 68.4%         |
| Unknown  | 0            | 0.0%          | 0              | 0.0%          | 0.0%                              | 3.5%                | 3.2%          |
| <b>TOTAL</b>   | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |              |               |                |               |                                   |                     |               |
| Low  | 0            | 0.0%          | 0              | 0.0%          | 21.6%                             | 10.0%               | 4.5%          |
| Moderate   | 0            | 0.0%          | 0              | 0.0%          | 16.2%                             | 17.8%               | 9.3%          |
| Middle   | 1            | 20.0%         | 50             | 7.2%          | 19.0%                             | 18.7%               | 11.0%         |
| Upper  | 2            | 40.0%         | 151            | 21.6%         | 43.2%                             | 47.2%               | 66.4%         |
| Unknown  | 2            | 40.0%         | 498            | 71.2%         | 0.0%                              | 6.3%                | 8.7%          |
| <b>TOTAL</b>   | <b>5</b>     | <b>100.0%</b> | <b>699</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |              |               |                |               |               |               |               |
|---------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0            | 0.0%          | 0              | 0.0%          | 21.6%         | 0.1%          | 0.1%          |
| Moderate                  | 0            | 0.0%          | 0              | 0.0%          | 16.2%         | 0.1%          | 0.1%          |
| Middle                    | 0            | 0.0%          | 0              | 0.0%          | 19.0%         | 0.1%          | 0.0%          |
| Upper                     | 0            | 0.0%          | 0              | 0.0%          | 43.2%         | 0.0%          | 0.0%          |
| Unknown                   | 0            | 0.0%          | 0              | 0.0%          | 0.0%          | 99.7%         | 99.8%         |
| <b>TOTAL</b>              | <b>0</b>     | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |              |               |                |               |               |               |               |
| Low                       | 77           | 3.6%          | 9,246          | 1.7%          | 21.6%         | 5.8%          | 2.8%          |
| Moderate                  | 329          | 15.3%         | 55,346         | 9.9%          | 16.2%         | 15.5%         | 10.4%         |
| Middle                    | 442          | 20.5%         | 96,433         | 17.3%         | 19.0%         | 19.1%         | 16.0%         |
| Upper                     | 1,030        | 47.8%         | 319,677        | 57.4%         | 43.2%         | 40.6%         | 50.7%         |
| Unknown                   | 275          | 12.8%         | 76,138         | 13.7%         | 0.0%          | 19.0%         | 20.1%         |
| <b>TOTAL</b>              | <b>2,153</b> | <b>100.0%</b> | <b>556,840</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |                |               |               |                     |
|---|------------------------------|------------|---------------|---------------|----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars        |               |               | Total<br>Businesses |
|   |                              | Bank       |               | Aggregate     | Bank           |               | Aggregate     |                     |
|   |                              | #          | %             | %             | \$ (000s)      | \$ %          | \$ %          | %                   |
| Business<br>Revenue   | \$1 Million or Less          | 277        | 49.0%         | 47.2%         | 46,853         | 42.2%         | 29.5%         | 89.2%               |
|   | Over \$1 Million/<br>Unknown | 288        | 51.0%         | 52.8%         | 64,139         | 57.8%         | 70.5%         | 10.8%               |
|   | <b>TOTAL</b>                 | <b>565</b> | <b>100.0%</b> | <b>100.0%</b> | <b>110,992</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>       |
| Loan Size   | \$100,000 or Less            | 300        | 53.1%         | 91.2%         | 8,312          | 7.5%          | 300           |                     |
|   | \$100,001–\$250,000          | 116        | 20.5%         | 4.0%          | 20,952         | 18.9%         | 116           |                     |
|   | \$250,001–\$1 Million        | 149        | 26.4%         | 4.7%          | 81,728         | 73.6%         | 149           |                     |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0              | 0.0%          | 0             |                     |
|   | <b>TOTAL</b>                 | <b>565</b> | <b>100.0%</b> | <b>100.0%</b> | <b>110,992</b> | <b>100.0%</b> | <b>565</b>    |                     |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 159        | 57.4%         |               | 3,720          | 7.9%          |               |                     |
|   | \$100,001–\$250,000          | 55         | 19.9%         |               | 10,155         | 21.7%         |               |                     |
|   | \$250,001–\$1 Million        | 63         | 22.7%         |               | 32,978         | 70.4%         |               |                     |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0              | 0.0%          |               |                     |
|   | <b>TOTAL</b>                 | <b>277</b> | <b>100.0%</b> |               | <b>46,853</b>  | <b>100.0%</b> |               |                     |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |              |               |               |                |               |               |                          |
|---|------------------------------|--------------|---------------|---------------|----------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count        |               |               | Dollars        |               |               | Total<br>Businesses<br>% |
|   |                              | Bank         |               | Aggregate     | Bank           |               | Aggregate     |                          |
|   |                              | #            | %             | %             | \$ (000s)      | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 323          | 21.2%         | 40.1%         | 53,835         | 25.5%         | 23.4%         | 89.5%                    |
|   | Over \$1 Million/<br>Unknown | 1,201        | 78.8%         | 59.9%         | 157,410        | 74.5%         | 76.6%         | 10.5%                    |
|   | <b>TOTAL</b>                 | <b>1,524</b> | <b>100.0%</b> | <b>100.0%</b> | <b>211,245</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 985          | 64.6%         | 83.8%         | 30,269         | 14.3%         | 24.0%         |                          |
|   | \$100,001–\$250,000          | 268          | 17.6%         | 8.5%          | 46,379         | 22.0%         | 19.8%         |                          |
|   | \$250,001–\$1 Million        | 271          | 17.8%         | 7.8%          | 134,597        | 63.7%         | 56.2%         |                          |
|   | Over \$1 Million             | 0            | 0.0%          | 0.0%          | 0              | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>1,524</b> | <b>100.0%</b> | <b>100.0%</b> | <b>211,245</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 179          | 55.4%         |               | 4,604          | 8.6%          |               |                          |
|   | \$100,001–\$250,000          | 63           | 19.5%         |               | 10,831         | 20.1%         |               |                          |
|   | \$250,001–\$1 Million        | 81           | 25.1%         |               | 38,400         | 71.3%         |               |                          |
|   | Over \$1 Million             | 0            | 0.0%          |               | 0              | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>323</b>   | <b>100.0%</b> |               | <b>53,835</b>  | <b>100.0%</b> |               |                          |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |          |               |               |              |               |               |               |
|---|------------------------------|----------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |               |               | Dollars      |               |               | Farms<br>%    |
|   |                              | Bank     |               | Aggregate     | Bank         |               | Aggregate     |               |
|   |                              | #        | %             | %             | \$ (000s)    | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 8        | 88.9%         | 56.6%         | 1,108        | 70.3%         | 65.0%         | 97.0%         |
|   | Over \$1 Million/<br>Unknown | 1        | 11.1%         | 43.4%         | 467          | 29.7%         | 35.0%         | 3.0%          |
|   | <b>TOTAL</b>                 | <b>9</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,575</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 5        | 55.6%         | 84.7%         | 221          | 14.0%         | 5             |               |
|   | \$100,001–\$250,000          | 1        | 11.1%         | 9.0%          | 200          | 12.7%         | 1             |               |
|   | \$250,001–\$500,000          | 3        | 33.3%         | 6.3%          | 1,154        | 73.3%         | 3             |               |
|   | Over \$500,000               | 0        | 0.0%          | 0.0%          | 0            | 0.0%          | 0             |               |
|   | <b>TOTAL</b>                 | <b>9</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1575</b>  | <b>100.0%</b> | <b>9</b>      |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 5        | 62.5%         |               | 221          | 19.9%         |               |               |
|   | \$100,001–\$250,000          | 1        | 12.5%         |               | 200          | 18.1%         |               |               |
|   | \$250,001–\$1 Million        | 2        | 25.0%         |               | 687          | 62.0%         |               |               |
|   | Over \$1 Million             | 0        | 0.0%          |               | 0            | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>8</b> | <b>100.0%</b> |               | <b>1,108</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |           |               |               |              |               |           |               |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|-----------|---------------|
| Farm Revenue and Loan Size  |                              | Count     |               |               | Dollars      |               |           | Farms         |
|   |                              | Bank      |               | Aggregate     | Bank         |               | Aggregate | %             |
|   |                              | #         | %             | %             | \$<br>(000s) | \$ %          | \$ %      |               |
| Farm Revenue  | \$1 Million or Less          | 8         | 72.7%         | 51.9%         | 1,230        | 63.7%         | 8         | 97.1%         |
|   | Over \$1 Million/<br>Unknown | 3         | 27.3%         | 48.1%         | 701          | 36.3%         | 3         | 2.9%          |
|   | <b>TOTAL</b>                 | <b>11</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,931</b> | <b>100.0%</b> | <b>11</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 5         | 45.5%         | 74.2%         | 241          | 12.5%         | 5         |               |
|   | \$100,001–\$250,000          | 3         | 27.3%         | 17.2%         | 654          | 33.9%         | 3         |               |
|   | \$250,001–\$500,000          | 3         | 27.3%         | 8.6%          | 1,036        | 53.7%         | 3         |               |
|   | Over \$500,000               | 0         | 0.0%          | 0.0%          | 0            | 0.0%          | 0         |               |
|   | <b>TOTAL</b>                 | <b>11</b> | <b>100.0%</b> | <b>100.0%</b> | <b>1,931</b> | <b>100.0%</b> | <b>11</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 4         | 50.0%         |               | 213          | 17.3%         |           |               |
|   | \$100,001–\$250,000          | 2         | 25.0%         |               | 448          | 36.4%         |           |               |
|   | \$250,001–\$1 Million        | 2         | 25.0%         |               | 569          | 46.3%         |           |               |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0            | 0.0%          |           |               |
|   | <b>TOTAL</b>                 | <b>8</b>  | <b>100.0%</b> |               | <b>1,230</b> | <b>100.0%</b> |           |               |

## OKLAHOMA

## Tulsa

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |              |               |                               |                     |               |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | ##            | \$ (000s)    | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 1          | 2.9%          | 264          | 3.1%          | 3.2%                          | 0.8%                | 0.4%          |
| Moderate   | 8          | 23.5%         | 851          | 10.1%         | 19.4%                         | 15.3%               | 9.6%          |
| Middle   | 7          | 20.6%         | 3,511        | 41.8%         | 42.2%                         | 41.6%               | 38.5%         |
| Upper  | 18         | 52.9%         | 3,777        | 44.9%         | 35.3%                         | 42.3%               | 51.5%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>34</b>  | <b>100.0%</b> | <b>8,403</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 3.2%                          | 0.7%                | 0.3%          |
| Moderate   | 4          | 22.2%         | 293          | 9.0%          | 19.4%                         | 11.5%               | 6.8%          |
| Middle   | 8          | 44.4%         | 1,454        | 44.9%         | 42.2%                         | 38.8%               | 33.5%         |
| Upper  | 6          | 33.3%         | 1,491        | 46.0%         | 35.3%                         | 48.9%               | 59.3%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>18</b>  | <b>100.0%</b> | <b>3,238</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 3.2%                          | 1.6%                | 0.9%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 19.4%                         | 13.6%               | 10.2%         |
| Middle   | 1          | 50.0%         | 30           | 23.1%         | 42.2%                         | 37.9%               | 34.9%         |
| Upper  | 1          | 50.0%         | 100          | 76.9%         | 35.3%                         | 46.9%               | 54.1%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>130</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 9.8%                          | 9.7%                | 3.8%          |
| Moderate   | 1          | 50.0%         | 297          | 80.9%         | 36.9%                         | 41.8%               | 17.6%         |
| Middle   | 1          | 50.0%         | 70           | 19.1%         | 31.7%                         | 31.5%               | 59.6%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 21.5%                         | 17.0%               | 19.1%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>367</b>   | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 3.2%                          | 0.8%                | 0.1%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 19.4%                         | 10.8%               | 6.2%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 42.2%                         | 30.3%               | 23.4%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.3%                         | 58.2%               | 70.2%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 3.2%                          | 1.3%                | 0.9%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 19.4%                         | 15.5%               | 10.1%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 42.2%                         | 40.2%               | 38.5%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.3%                         | 42.9%               | 50.4%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 3.2%                          | 2.1%                | 2.1%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 19.4%                         | 21.3%               | 12.0%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 42.2%                         | 43.0%               | 39.8%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.3%                         | 33.6%               | 46.1%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 1         | 1.8%          | 264           | 2.2%          | 3.2%          | 0.9%          | 0.7%          |
| Moderate                  | 13        | 23.2%         | 1,441         | 11.9%         | 19.4%         | 14.6%         | 9.8%          |
| Middle                    | 17        | 30.4%         | 5,065         | 41.7%         | 42.2%         | 40.5%         | 39.3%         |
| Upper                     | 25        | 44.6%         | 5,368         | 44.2%         | 35.3%         | 43.9%         | 50.1%         |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>56</b> | <b>100.0%</b> | <b>12,138</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                                  |                     |               |
|--|------------|---------------|---------------|---------------|----------------------------------|---------------------|---------------|
| Census<br>Tract<br>Income<br>Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied<br>Units | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)     | \$ %          |                                  | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.2%                             | 1.1%                | 0.4%          |
| Moderate   | 5          | 12.8%         | 276           | 2.9%          | 19.4%                            | 13.8%               | 8.7%          |
| Middle   | 16         | 41.0%         | 2,712         | 28.4%         | 42.2%                            | 40.0%               | 35.6%         |
| Upper  | 18         | 46.2%         | 6,567         | 68.7%         | 35.3%                            | 45.2%               | 55.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>39</b>  | <b>100.0%</b> | <b>9,555</b>  | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                  |                     |               |
| Low  | 1          | 1.7%          | 50            | 0.4%          | 3.2%                             | 0.4%                | 0.2%          |
| Moderate   | 6          | 10.0%         | 570           | 4.3%          | 19.4%                            | 8.4%                | 5.1%          |
| Middle   | 21         | 35.0%         | 3,941         | 29.9%         | 42.2%                            | 35.8%               | 31.1%         |
| Upper  | 32         | 53.3%         | 8,626         | 65.4%         | 35.3%                            | 55.5%               | 63.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>60</b>  | <b>100.0%</b> | <b>13,187</b> | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.2%                             | 1.1%                | 0.5%          |
| Moderate   | 1          | 50.0%         | 71            | 33.0%         | 19.4%                            | 14.4%               | 11.5%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 35.4%               | 31.4%         |
| Upper  | 1          | 50.0%         | 144           | 67.0%         | 35.3%                            | 49.0%               | 56.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>215</b>    | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                  |                     |               |
| Low  | 1          | 50.0%         | 80            | 1.4%          | 9.8%                             | 12.8%               | 4.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 36.9%                            | 43.9%               | 48.9%         |
| Middle   | 1          | 50.0%         | 5,495         | 98.6%         | 31.7%                            | 35.1%               | 39.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 21.5%                            | 8.1%                | 7.4%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>5,575</b>  | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.2%                             | 0.4%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 19.4%                            | 8.3%                | 4.3%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 30.9%               | 25.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.3%                            | 60.4%               | 70.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.2%                             | 1.1%                | 0.5%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 19.4%                            | 14.7%               | 8.3%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 40.8%               | 30.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.3%                            | 43.4%               | 60.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.2%                             | 1.4%                | 0.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 19.4%                            | 20.3%               | 12.0%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 45.0%               | 38.7%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.3%                            | 33.3%               | 48.8%         |



## Appendix C (continued)

|                                  |            |               |               |               |               |               |               |
|----------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Unknown                          | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>                     | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| <b>Total Home Mortgage Loans</b> |            |               |               |               |               |               |               |
| Low                              | 2          | 1.9%          | 130           | 0.5%          | 3.2%          | 0.8%          | 0.5%          |
| Moderate                         | 12         | 11.7%         | 917           | 3.2%          | 19.4%         | 11.8%         | 8.6%          |
| Middle                           | 38         | 36.9%         | 12,148        | 42.6%         | 42.2%         | 38.1%         | 33.7%         |
| Upper                            | 51         | 49.5%         | 15,337        | 53.8%         | 35.3%         | 49.3%         | 57.3%         |
| Unknown                          | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>                     | <b>103</b> | <b>100.0%</b> | <b>28,532</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| <b>Distribution of 2019 Small Business Lending<br/>By Income Level of Geography</b> |                           |               |               |               |                 |                        |               |
|---|---------------------------|---------------|---------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)     | \$ %          |                 | %                      | \$ %          |
| Low   | 12                        | 3.5%          | 1,199         | 2.1%          | 3.4%            | 2.7%                   | 3.8%          |
| Moderate  | 82                        | 24.2%         | 10,093        | 17.9%         | 22.5%           | 20.1%                  | 23.7%         |
| Middle  | 118                       | 34.8%         | 25,404        | 45.2%         | 38.5%           | 38.5%                  | 40.7%         |
| Upper   | 127                       | 37.5%         | 19,563        | 34.8%         | 35.6%           | 36.1%                  | 31.1%         |
| Unknown   | 0                         | 0.0%          | 0             | 0.0%          | 0.0%            | 2.6%                   | 0.7%          |
| <b>TOTAL</b>  | <b>339</b>                | <b>100.0%</b> | <b>56,259</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| <b>Distribution of 2020 Small Business Lending<br/>By Income Level of Geography</b> |                           |               |               |               |                    |                        |               |
|---|---------------------------|---------------|---------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)     | \$ %          |                    | %                      | \$ %          |
| Low   | 17                        | 3.4%          | 1,750         | 2.5%          | 3.3%               | 2.6%                   | 3.3%          |
| Moderate  | 126                       | 24.9%         | 14,901        | 21.5%         | 22.5%              | 20.9%                  | 23.6%         |
| Middle  | 190                       | 37.5%         | 28,795        | 41.5%         | 38.5%              | 39.8%                  | 41.9%         |
| Upper   | 173                       | 34.2%         | 23,858        | 34.4%         | 35.6%              | 36.1%                  | 30.9%         |
| Unknown   | 0                         | 0.0%          | 0             | 0.0%          | 0.0%               | 0.6%                   | 0.2%          |
| <b>TOTAL</b>  | <b>506</b>                | <b>100.0%</b> | <b>69,304</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| <b>Distribution of 2019 Small Farm Lending<br/>By Income Level of Geography</b> |                       |               |            |               |               |                        |               |
|---|-----------------------|---------------|------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |            |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %             | \$ (000s)  | \$ %          |               | #                      | \$ %          |
| Low   | 0                     | 0.0%          | 0          | 0.0%          | 0.5%          | 0.0%                   | 0.0%          |
| Moderate  | 0                     | 0.0%          | 0          | 0.0%          | 12.1%         | 7.4%                   | 4.6%          |
| Middle  | 1                     | 33.3%         | 57         | 36.3%         | 50.8%         | 64.7%                  | 74.2%         |
| Upper   | 2                     | 66.7%         | 100        | 63.7%         | 36.6%         | 26.6%                  | 21.1%         |
| Unknown   | 0                     | 0.0%          | 0          | 0.0%          | 0.0%          | 1.4%                   | 0.2%          |
| <b>TOTAL</b>  | <b>3</b>              | <b>100.0%</b> | <b>157</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| <b>Distribution of 2020 Small Farm Lending<br/>By Income Level of Geography</b> |                       |               |            |               |               |                        |               |
|---|-----------------------|---------------|------------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |            |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %             | \$ (000s)  | \$ %          |               | #                      | \$ %          |
| Low   | 0                     | 0.0%          | 0          | 0.0%          | 1.3%          | 0.3%                   | 0.0%          |
| Moderate  | 0                     | 0.0%          | 0          | 0.0%          | 12.1%         | 8.2%                   | 6.1%          |
| Middle  | 1                     | 25.0%         | 32         | 13.2%         | 49.8%         | 65.4%                  | 74.9%         |
| Upper   | 3                     | 75.0%         | 210        | 86.8%         | 36.7%         | 25.2%                  | 18.9%         |
| Unknown   | 0                     | 0.0%          | 0          | 0.0%          | 0.0%          | 0.9%                   | 0.1%          |
| <b>TOTAL</b>  | <b>4</b>              | <b>100.0%</b> | <b>242</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |              |               |                                   |                     |               |
|--|------------|---------------|--------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)    | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 7.0%                | 3.8%          |
| Moderate   | 2          | 5.9%          | 432          | 5.1%          | 17.5%                             | 20.1%               | 14.5%         |
| Middle   | 6          | 17.6%         | 859          | 10.2%         | 20.1%                             | 21.0%               | 18.9%         |
| Upper  | 10         | 29.4%         | 2,562        | 30.5%         | 41.0%                             | 34.4%               | 47.6%         |
| Unknown  | 16         | 47.1%         | 4,550        | 54.1%         | 0.0%                              | 17.5%               | 15.1%         |
| <b>TOTAL</b>   | <b>34</b>  | <b>100.0%</b> | <b>8,403</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 6.3%                | 2.9%          |
| Moderate   | 1          | 5.6%          | 102          | 3.2%          | 17.5%                             | 12.8%               | 7.7%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.1%                             | 18.6%               | 13.5%         |
| Upper  | 3          | 16.7%         | 576          | 17.8%         | 41.0%                             | 44.2%               | 55.1%         |
| Unknown  | 14         | 77.8%         | 2,560        | 79.1%         | 0.0%                              | 18.1%               | 20.8%         |
| <b>TOTAL</b>   | <b>18</b>  | <b>100.0%</b> | <b>3,238</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 6.1%                | 4.4%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.5%                             | 12.9%               | 9.0%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.1%                             | 19.7%               | 14.8%         |
| Upper  | 2          | 100.0%        | 130          | 100.0%        | 41.0%                             | 50.5%               | 57.4%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 10.9%               | 14.5%         |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>130</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 0.6%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.5%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.1%                             | 2.4%                | 0.1%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 41.0%                             | 4.8%                | 0.4%          |
| Unknown  | 2          | 100.0%        | 367          | 100.0%        | 0.0%                              | 92.1%               | 99.4%         |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>367</b>   | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 4.7%                | 2.8%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.5%                             | 13.7%               | 9.4%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.1%                             | 17.1%               | 13.8%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 41.0%                             | 58.7%               | 68.6%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 5.8%                | 5.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 10.2%               | 7.3%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.5%                             | 20.6%               | 15.6%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.1%                             | 15.0%               | 10.1%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 41.0%                             | 47.2%               | 58.2%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 7.0%                | 8.8%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 21.4%                             | 0.4%                | 0.2%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.5%                             | 0.6%                | 0.5%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.1%                             | 0.3%                | 0.3%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 41.0%                             | 0.8%                | 1.6%          |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 97.9%               | 97.4%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0         | 0.0%          | 0             | 0.0%          | 21.4%         | 6.6%          | 3.2%          |
| Moderate                  | 3         | 5.4%          | 534           | 4.4%          | 17.5%         | 17.3%         | 11.1%         |
| Middle                    | 6         | 10.7%         | 859           | 7.1%          | 20.1%         | 19.6%         | 15.3%         |
| Upper                     | 15        | 26.8%         | 3,268         | 26.9%         | 41.0%         | 36.9%         | 44.1%         |
| Unknown                   | 32        | 57.1%         | 7,477         | 61.6%         | 0.0%          | 19.7%         | 26.3%         |
| <b>TOTAL</b>              | <b>56</b> | <b>100.0%</b> | <b>12,138</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 1          | 2.6%          | 119           | 1.2%          | 21.4%                             | 5.3%                | 2.8%          |
| Moderate   | 3          | 7.7%          | 374           | 3.9%          | 17.5%                             | 19.6%               | 14.1%         |
| Middle   | 3          | 7.7%          | 586           | 6.1%          | 20.1%                             | 20.7%               | 18.9%         |
| Upper  | 18         | 46.2%         | 4,607         | 48.2%         | 41.0%                             | 37.5%               | 49.2%         |
| Unknown  | 14         | 35.9%         | 3,869         | 40.5%         | 0.0%                              | 17.0%               | 15.0%         |
| <b>TOTAL</b>   | <b>39</b>  | <b>100.0%</b> | <b>9,555</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.4%                             | 2.9%                | 1.4%          |
| Moderate   | 6          | 10.0%         | 755           | 5.7%          | 17.5%                             | 10.5%               | 6.2%          |
| Middle   | 7          | 11.7%         | 1,332         | 10.1%         | 20.1%                             | 16.5%               | 12.3%         |
| Upper  | 28         | 46.7%         | 6,891         | 52.3%         | 41.0%                             | 48.3%               | 58.1%         |
| Unknown  | 19         | 31.7%         | 4,209         | 31.9%         | 0.0%                              | 21.8%               | 21.9%         |
| <b>TOTAL</b>   | <b>60</b>  | <b>100.0%</b> | <b>13,187</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.4%                             | 5.0%                | 3.2%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.5%                             | 12.5%               | 9.5%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.1%                             | 18.2%               | 14.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 41.0%                             | 55.0%               | 61.2%         |
| Unknown  | 2          | 100.0%        | 215           | 100.0%        | 0.0%                              | 9.2%                | 11.4%         |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>215</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 1          | 50.0%         | 80            | 1.4%          | 21.4%                             | 0.7%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.5%                             | 0.7%                | 0.2%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.1%                             | 1.4%                | 0.2%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 41.0%                             | 9.5%                | 1.9%          |
| Unknown  | 1          | 50.0%         | 5,495         | 98.6%         | 0.0%                              | 87.8%               | 97.7%         |
| <b>TOTAL</b>   | <b>2</b>   | <b>100.0%</b> | <b>5,575</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.4%                             | 5.0%                | 2.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.5%                             | 11.2%               | 5.9%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.1%                             | 15.8%               | 11.1%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 41.0%                             | 60.4%               | 71.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 7.6%                | 9.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 21.4%                             | 5.3%                | 1.9%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.5%                             | 21.1%               | 16.8%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.1%                             | 12.8%               | 5.9%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 41.0%                             | 49.1%               | 63.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 11.7%               | 11.6%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 21.4%         | 0.0%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0             | 0.0%          | 17.5%         | 0.2%          | 0.2%          |
| Middle                    | 0          | 0.0%          | 0             | 0.0%          | 20.1%         | 0.0%          | 0.0%          |
| Upper                     | 0          | 0.0%          | 0             | 0.0%          | 41.0%         | 0.2%          | 0.2%          |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 99.6%         | 99.6%         |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |               |               |               |               |               |
| Low                       | 2          | 1.9%          | 199           | 0.7%          | 21.4%         | 4.1%          | 2.0%          |
| Moderate                  | 9          | 8.7%          | 1,129         | 4.0%          | 17.5%         | 14.8%         | 9.8%          |
| Middle                    | 10         | 9.7%          | 1,918         | 6.7%          | 20.1%         | 18.0%         | 14.9%         |
| Upper                     | 46         | 44.7%         | 11,498        | 40.3%         | 41.0%         | 41.6%         | 50.8%         |
| Unknown                   | 36         | 35.0%         | 13,788        | 48.3%         | 0.0%          | 21.6%         | 22.5%         |
| <b>TOTAL</b>              | <b>103</b> | <b>100.0%</b> | <b>28,532</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                          |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total<br>Businesses<br>% |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                          |
|   |                              | #          | %             | %             | \$ (000s)     | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 191        | 56.3%         | 45.3%         | 28,521        | 50.7%         | 33.8%         | 90.7%                    |
|   | Over \$1 Million/<br>Unknown | 148        | 43.7%         | 54.7%         | 27,738        | 49.3%         | 66.2%         | 9.3%                     |
|   | <b>TOTAL</b>                 | <b>339</b> | <b>100.0%</b> | <b>100.0%</b> | <b>56,259</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 199        | 58.7%         | 92.3%         | 8,034         | 14.3%         | 32.8%         |                          |
|   | \$100,001–\$250,000          | 75         | 22.1%         | 3.8%          | 13,706        | 24.4%         | 16.0%         |                          |
|   | \$250,001–\$1 Million        | 65         | 19.2%         | 3.9%          | 34,519        | 61.4%         | 51.2%         |                          |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>339</b> | <b>100.0%</b> | <b>100.0%</b> | <b>56,259</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 118        | 61.8%         |               | 4,810         | 16.9%         |               |                          |
|   | \$100,001–\$250,000          | 43         | 22.5%         |               | 7,773         | 27.3%         |               |                          |
|   | \$250,001–\$1 Million        | 30         | 15.7%         |               | 15,938        | 55.9%         |               |                          |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>191</b> | <b>100.0%</b> |               | <b>28,521</b> | <b>100.0%</b> |               |                          |

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                     |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total<br>Businesses |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                     |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          | %                   |
| Business<br>Revenue   | \$1 Million or Less          | 159        | 31.4%         | 33.3%         | 21,211        | 30.6%         | 23.1%         | 90.9%               |
|   | Over \$1 Million/<br>Unknown | 347        | 68.6%         | 66.7%         | 48,093        | 69.4%         | 76.9%         | 9.1%                |
|   | <b>TOTAL</b>                 | <b>506</b> | <b>100.0%</b> | <b>100.0%</b> | <b>69,304</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>       |
| Loan Size   | \$100,000 or Less            | 334        | 66.0%         | 87.3%         | 12,458        | 18.0%         | 28.6%         |                     |
|   | \$100,001–\$250,000          | 90         | 17.8%         | 6.5%          | 15,758        | 22.7%         | 17.7%         |                     |
|   | \$250,001–\$1 Million        | 82         | 16.2%         | 6.2%          | 41,088        | 59.3%         | 53.7%         |                     |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                     |
|   | <b>TOTAL</b>                 | <b>506</b> | <b>100.0%</b> | <b>100.0%</b> | <b>69,304</b> | <b>100.0%</b> | <b>100.0%</b> |                     |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 106        | 66.7%         |               | 4,269         | 20.1%         |               |                     |
|   | \$100,001–\$250,000          | 31         | 19.5%         |               | 5,635         | 26.6%         |               |                     |
|   | \$250,001–\$1 Million        | 22         | 13.8%         |               | 11,307        | 53.3%         |               |                     |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                     |
|   | <b>TOTAL</b>                 | <b>159</b> | <b>100.0%</b> |               | <b>21,211</b> | <b>100.0%</b> |               |                     |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |          |               |               |            |               |               |               |
|---|------------------------------|----------|---------------|---------------|------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |               |               | Dollars    |               |               | Farms         |
|   |                              | Bank     |               | Aggregate     | Bank       |               | Aggregate     |               |
|   |                              | #        | %             | %             | \$ (000s)  | \$ %          | \$ %          | %             |
| Farm<br>Revenue   | \$1 Million or Less          | 2        | 66.7%         | 80.8%         | 100        | 63.7%         | 88.3%         | 97.0%         |
|   | Over \$1 Million/<br>Unknown | 1        | 33.3%         | 19.2%         | 57         | 36.3%         | 11.7%         | 3.0%          |
|   | <b>TOTAL</b>                 | <b>3</b> | <b>100.0%</b> | <b>100.0%</b> | <b>157</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%          | 81.9%         | 0          | 0.0%          | 31.8%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%          | 11.0%         | 0          | 0.0%          | 27.6%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%          | 7.1%          | 0          | 0.0%          | 40.5%         |               |
|   | Over \$500,000               | 3        | 100.0%        | 0.0%          | 157        | 100.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>3</b> | <b>100.0%</b> | <b>100.0%</b> | <b>157</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | Over \$1 Million             | 2        | 100.0%        |               | 100        | 100.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>2</b> | <b>100.0%</b> |               | <b>100</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |          |               |               |            |               |               |               |
|---|------------------------------|----------|---------------|---------------|------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |               |               | Dollars    |               |               | Farms<br>%    |
|   |                              | Bank     |               | Aggregate     | Bank       |               | Aggregate     |               |
|   |                              | #        | %             | %             | \$ (000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 2        | 50.0%         | 78.3%         | 200        | 82.6%         | 85.7%         | 98.5%         |
|   | Over \$1 Million/<br>Unknown | 2        | 50.0%         | 21.7%         | 42         | 17.4%         | 14.3%         | 1.5%          |
|   | <b>TOTAL</b>                 | <b>4</b> | <b>100.0%</b> | <b>100.0%</b> | <b>242</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 3        | 75.0%         | 80.6%         | 92         | 38.0%         | 34.4%         |               |
|   | \$100,001–\$250,000          | 1        | 25.0%         | 12.9%         | 150        | 62.0%         | 32.8%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%          | 6.5%          | 0          | 0.0%          | 32.9%         |               |
|   | Over \$500,000               | 0        | 0.0%          | 0.0%          | 0          | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>4</b> | <b>100.0%</b> | <b>100.0%</b> | <b>242</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 1        | 50.0%         |               | 50         | 25.0%         |               |               |
|   | \$100,001–\$250,000          | 1        | 50.0%         |               | 150        | 75.0%         |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | Over \$1 Million             | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>2</b> | <b>100.0%</b> |               | <b>200</b> | <b>100.0%</b> |               |               |

## Oklahoma City

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |              |               |                               |                     |               |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)    | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 6.1%                          | 3.6%                | 2.0%          |
| Moderate   | 5          | 17.2%         | 567          | 10.1%         | 25.8%                         | 19.1%               | 11.9%         |
| Middle   | 6          | 20.7%         | 598          | 10.6%         | 32.5%                         | 30.8%               | 25.5%         |
| Upper  | 18         | 62.1%         | 4,457        | 79.3%         | 35.4%                         | 46.2%               | 60.3%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.1%                          | 0.2%                | 0.3%          |
| <b>TOTAL</b>   | <b>29</b>  | <b>100.0%</b> | <b>5,622</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                               |                     |               |
| Low  | 1          | 4.5%          | 107          | 3.4%          | 6.1%                          | 3.0%                | 1.5%          |
| Moderate   | 9          | 40.9%         | 787          | 24.7%         | 25.8%                         | 17.5%               | 9.5%          |
| Middle   | 6          | 27.3%         | 995          | 31.2%         | 32.5%                         | 30.0%               | 22.7%         |
| Upper  | 6          | 27.3%         | 1,296        | 40.7%         | 35.4%                         | 49.4%               | 66.0%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.1%                          | 0.2%                | 0.4%          |
| <b>TOTAL</b>   | <b>22</b>  | <b>100.0%</b> | <b>3,185</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 6.1%                          | 4.0%                | 2.8%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 25.8%                         | 18.8%               | 13.3%         |
| Middle   | 1          | 100.0%        | 20           | 100.0%        | 32.5%                         | 29.2%               | 22.7%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.4%                         | 47.7%               | 60.9%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.1%                          | 0.2%                | 0.3%          |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>20</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 11.4%                         | 17.6%               | 8.2%          |
| Moderate   | 3          | 100.0%        | 9,846        | 100.0%        | 43.7%                         | 47.6%               | 44.2%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 28.7%                         | 20.9%               | 32.9%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 14.4%                         | 12.8%               | 14.1%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 1.8%                          | 1.1%                | 0.5%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>9,846</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 6.1%                          | 1.5%                | 0.8%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 25.8%                         | 11.2%               | 6.2%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 32.5%                         | 26.0%               | 15.2%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.4%                         | 61.1%               | 72.6%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.1%                          | 0.3%                | 5.2%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 6.1%                          | 2.6%                | 1.1%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 25.8%                         | 17.5%               | 10.0%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 32.5%                         | 31.5%               | 17.9%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.4%                         | 48.5%               | 71.0%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.1%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 6.1%                          | 4.9%                | 2.6%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 25.8%                         | 30.5%               | 17.9%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 32.5%                         | 33.4%               | 29.1%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.4%                         | 31.2%               | 50.3%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.1%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 1         | 1.8%          | 107           | 0.6%          | 6.1%          | 3.6%          | 2.4%          |
| Moderate                  | 17        | 30.9%         | 11,200        | 60.0%         | 25.8%         | 19.2%         | 14.2%         |
| Middle                    | 13        | 23.6%         | 1,613         | 8.6%          | 32.5%         | 30.5%         | 25.4%         |
| Upper                     | 24        | 43.6%         | 5,753         | 30.8%         | 35.4%         | 46.5%         | 57.7%         |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.1%          | 0.2%          | 0.4%          |
| <b>TOTAL</b>              | <b>55</b> | <b>100.0%</b> | <b>18,673</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 1          | 4.0%          | 213           | 3.3%          | 6.1%                          | 3.6%                | 2.0%          |
| Moderate   | 6          | 24.0%         | 695           | 10.9%         | 25.8%                         | 18.9%               | 12.0%         |
| Middle   | 4          | 16.0%         | 373           | 5.8%          | 32.5%                         | 28.8%               | 23.9%         |
| Upper  | 14         | 56.0%         | 5,104         | 79.9%         | 35.4%                         | 48.6%               | 61.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.1%                          | 0.2%                | 0.3%          |
| <b>TOTAL</b>   | <b>25</b>  | <b>100.0%</b> | <b>6,385</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 9          | 25.7%         | 759           | 14.9%         | 6.1%                          | 1.8%                | 0.8%          |
| Moderate   | 9          | 25.7%         | 644           | 12.7%         | 25.8%                         | 12.0%               | 6.9%          |
| Middle   | 6          | 17.1%         | 784           | 15.4%         | 32.5%                         | 26.2%               | 19.6%         |
| Upper  | 11         | 31.4%         | 2,903         | 57.0%         | 35.4%                         | 59.8%               | 72.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.1%                          | 0.3%                | 0.4%          |
| <b>TOTAL</b>   | <b>35</b>  | <b>100.0%</b> | <b>5,090</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 6.1%                          | 5.1%                | 3.6%          |
| Moderate   | 1          | 100.0%        | 29            | 100.0%        | 25.8%                         | 16.8%               | 12.0%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 32.5%                         | 33.1%               | 24.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.4%                         | 44.8%               | 59.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.1%                          | 0.2%                | 0.7%          |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>29</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 11.4%                         | 13.8%               | 5.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 43.7%                         | 50.0%               | 32.1%         |
| Middle   | 1          | 33.3%         | 2,360         | 8.2%          | 28.7%                         | 20.5%               | 29.4%         |
| Upper  | 2          | 66.7%         | 26,435        | 91.8%         | 14.4%                         | 14.7%               | 32.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 1.8%                          | 0.9%                | 0.8%          |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>28,795</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 6.1%                          | 2.4%                | 0.9%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 25.8%                         | 15.5%               | 7.7%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 32.5%                         | 24.2%               | 18.0%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.4%                         | 57.9%               | 73.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.1%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 6.1%                          | 3.1%                | 1.2%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 25.8%                         | 17.6%               | 9.7%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 32.5%                         | 29.1%               | 18.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.4%                         | 50.3%               | 70.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.1%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 6.1%                          | 6.0%                | 3.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 25.8%                         | 27.8%               | 16.2%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 32.5%                         | 34.8%               | 31.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.4%                         | 31.3%               | 49.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.1%                          | 0.1%                | 0.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 10        | 15.6%         | 972           | 2.4%          | 6.1%          | 3.0%          | 1.8%          |
| Moderate                  | 16        | 25.0%         | 1,368         | 3.4%          | 25.8%         | 16.4%         | 11.4%         |
| Middle                    | 11        | 17.2%         | 3,517         | 8.7%          | 32.5%         | 27.9%         | 22.6%         |
| Upper                     | 27        | 42.2%         | 34,442        | 85.5%         | 35.4%         | 52.5%         | 63.9%         |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.1%          | 0.2%          | 0.4%          |
| <b>TOTAL</b>              | <b>64</b> | <b>100.0%</b> | <b>40,299</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |               |               |                 |                        |               |
|---|---------------------------|---------------|---------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)     | \$ %          |                 | %                      | \$ %          |
| Low   | 15                        | 12.5%         | 2,519         | 10.5%         | 6.6%            | 6.3%                   | 8.1%          |
| Moderate  | 30                        | 25.0%         | 5,189         | 21.6%         | 26.7%           | 22.8%                  | 24.1%         |
| Middle  | 26                        | 21.7%         | 5,157         | 21.5%         | 30.5%           | 29.3%                  | 30.0%         |
| Upper   | 49                        | 40.8%         | 11,126        | 46.4%         | 31.6%           | 35.2%                  | 31.2%         |
| Unknown   | 0                         | 0.0%          | 0             | 0.0%          | 4.5%            | 6.3%                   | 6.5%          |
| <b>TOTAL</b>  | <b>120</b>                | <b>100.0%</b> | <b>23,991</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |               |               |                    |                        |               |
|---|---------------------------|---------------|---------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)     | \$ %          |                    | %                      | \$ %          |
| Low   | 10                        | 5.7%          | 2,098         | 7.2%          | 6.7%               | 6.3%                   | 7.6%          |
| Moderate  | 35                        | 19.9%         | 4,534         | 15.5%         | 26.9%              | 24.3%                  | 27.0%         |
| Middle  | 47                        | 26.7%         | 8,333         | 28.5%         | 30.4%              | 29.2%                  | 28.7%         |
| Upper   | 81                        | 46.0%         | 14,133        | 48.3%         | 31.4%              | 35.9%                  | 30.2%         |
| Unknown   | 3                         | 1.7%          | 158           | 0.5%          | 4.6%               | 4.2%                   | 6.5%          |
| <b>TOTAL</b>  | <b>176</b>                | <b>100.0%</b> | <b>29,256</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 3.9%          | 0.5%                   | 2.8%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 15.0%         | 7.4%                   | 5.8%          |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 27.2%         | 34.5%                  | 27.9%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 53.2%         | 54.7%                  | 51.0%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 0.7%          | 3.0%                   | 12.5%         |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 4.1%          | 1.8%                   | 2.4%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 15.0%         | 10.8%                  | 7.7%          |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 26.2%         | 44.6%                  | 41.9%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 53.9%         | 42.2%                  | 42.5%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 0.8%          | 0.6%                   | 5.5%          |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |              |               |                                   |                     |               |
|--|------------|---------------|--------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)    | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 7.4%                | 4.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 19.1%               | 14.3%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 18.5%               | 17.4%         |
| Upper  | 3          | 10.3%         | 392          | 7.0%          | 38.3%                             | 33.5%               | 46.2%         |
| Unknown  | 26         | 89.7%         | 5,230        | 93.0%         | 0.0%                              | 21.5%               | 18.0%         |
| <b>TOTAL</b>   | <b>29</b>  | <b>100.0%</b> | <b>5,622</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 6.8%                | 2.8%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 12.8%               | 7.3%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 15.3%               | 11.3%         |
| Upper  | 2          | 9.1%          | 251          | 7.9%          | 38.3%                             | 37.5%               | 49.1%         |
| Unknown  | 20         | 90.9%         | 2,934        | 92.1%         | 0.0%                              | 27.6%               | 29.5%         |
| <b>TOTAL</b>   | <b>22</b>  | <b>100.0%</b> | <b>3,185</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 6.6%                | 3.6%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 16.4%               | 9.7%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 17.2%               | 13.1%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 38.3%                             | 49.2%               | 56.2%         |
| Unknown  | 1          | 100.0%        | 20           | 100.0%        | 0.0%                              | 10.6%               | 17.4%         |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>20</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 0.5%                | 0.1%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 2.1%                | 0.3%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 38.3%                             | 6.4%                | 1.7%          |
| Unknown  | 3          | 100.0%        | 9,846        | 100.0%        | 0.0%                              | 90.9%               | 97.9%         |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>9,846</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 5.3%                | 2.3%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 10.3%               | 5.0%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 23.9%               | 13.8%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 38.3%                             | 56.6%               | 69.9%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 3.8%                | 9.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 9.8%                | 5.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 18.4%               | 10.1%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 19.8%               | 13.7%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 38.3%                             | 44.8%               | 54.5%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 7.2%                | 16.7%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 24.7%                             | 0.9%                | 0.3%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 17.9%                             | 0.5%                | 0.5%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 19.1%                             | 0.4%                | 0.3%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 38.3%                             | 0.5%                | 1.5%          |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 97.8%               | 97.4%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0         | 0.0%          | 0             | 0.0%          | 24.7%         | 7.0%          | 3.3%          |
| Moderate                  | 0         | 0.0%          | 0             | 0.0%          | 17.9%         | 16.6%         | 10.9%         |
| Middle                    | 0         | 0.0%          | 0             | 0.0%          | 19.1%         | 17.0%         | 14.0%         |
| Upper                     | 5         | 9.1%          | 643           | 3.4%          | 38.3%         | 34.3%         | 42.5%         |
| Unknown                   | 50        | 90.9%         | 18,030        | 96.6%         | 0.0%          | 25.2%         | 29.3%         |
| <b>TOTAL</b>              | <b>55</b> | <b>100.0%</b> | <b>18,673</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 2          | 8.0%          | 189           | 3.0%          | 24.7%                             | 6.9%                | 3.8%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.9%                             | 18.7%               | 13.9%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 19.1%                             | 18.2%               | 17.3%         |
| Upper  | 13         | 52.0%         | 3,419         | 53.5%         | 38.3%                             | 33.8%               | 45.9%         |
| Unknown  | 10         | 40.0%         | 2,777         | 43.5%         | 0.0%                              | 22.4%               | 19.0%         |
| <b>TOTAL</b>   | <b>25</b>  | <b>100.0%</b> | <b>6,385</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 24.7%                             | 3.7%                | 1.5%          |
| Moderate   | 1          | 2.9%          | 160           | 3.1%          | 17.9%                             | 10.7%               | 6.1%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 19.1%                             | 14.8%               | 11.1%         |
| Upper  | 5          | 14.3%         | 1,198         | 23.5%         | 38.3%                             | 43.4%               | 53.7%         |
| Unknown  | 29         | 82.9%         | 3,732         | 73.3%         | 0.0%                              | 27.5%               | 27.6%         |
| <b>TOTAL</b>   | <b>35</b>  | <b>100.0%</b> | <b>5,090</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 24.7%                             | 7.3%                | 3.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.9%                             | 13.8%               | 9.8%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 19.1%                             | 19.8%               | 13.2%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.3%                             | 46.1%               | 58.8%         |
| Unknown  | 1          | 100.0%        | 29            | 100.0%        | 0.0%                              | 13.1%               | 14.7%         |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>29</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 24.7%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.9%                             | 0.4%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 19.1%                             | 0.9%                | 0.1%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.3%                             | 4.5%                | 1.1%          |
| Unknown  | 3          | 100.0%        | 28,795        | 100.0%        | 0.0%                              | 94.2%               | 98.8%         |
| <b>TOTAL</b>   | <b>3</b>   | <b>100.0%</b> | <b>28,795</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 24.7%                             | 7.1%                | 3.5%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.9%                             | 15.1%               | 7.4%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 19.1%                             | 19.0%               | 9.6%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.3%                             | 54.4%               | 69.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 4.4%                | 9.9%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 24.7%                             | 7.8%                | 3.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 17.9%                             | 18.2%               | 10.1%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 19.1%                             | 18.7%               | 13.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 38.3%                             | 46.1%               | 64.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 9.2%                | 8.1%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0         | 0.0%          | 0             | 0.0%          | 24.7%         | 0.1%          | 0.0%          |
| Moderate                  | 0         | 0.0%          | 0             | 0.0%          | 17.9%         | 0.2%          | 0.2%          |
| Middle                    | 0         | 0.0%          | 0             | 0.0%          | 19.1%         | 0.0%          | 0.0%          |
| Upper                     | 0         | 0.0%          | 0             | 0.0%          | 38.3%         | 0.0%          | 0.0%          |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.0%          | 99.7%         | 99.8%         |
| <b>TOTAL</b>              | <b>0</b>  | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |           |               |               |               |               |               |               |
| Low                       | 2         | 3.1%          | 189           | 0.5%          | 24.7%         | 5.3%          | 2.5%          |
| Moderate                  | 1         | 1.6%          | 160           | 0.4%          | 17.9%         | 14.4%         | 9.3%          |
| Middle                    | 0         | 0.0%          | 0             | 0.0%          | 19.1%         | 16.0%         | 13.0%         |
| Upper                     | 18        | 28.1%         | 4,617         | 11.5%         | 38.3%         | 36.9%         | 45.3%         |
| Unknown                   | 43        | 67.2%         | 35,333        | 87.7%         | 0.0%          | 27.5%         | 29.9%         |
| <b>TOTAL</b>              | <b>64</b> | <b>100.0%</b> | <b>40,299</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                          |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total<br>Businesses<br>% |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                          |
|   |                              | #          | %             | %             | \$<br>(000s)  | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 92         | 76.7%         | 44.2%         | 16,987        | 70.8%         | 39.0%         | 90.5%                    |
|   | Over \$1 Million/<br>Unknown | 28         | 23.3%         | 55.8%         | 7,004         | 29.2%         | 61.0%         | 9.5%                     |
|   | <b>TOTAL</b>                 | <b>120</b> | <b>100.0%</b> | <b>100.0%</b> | <b>23,991</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 55         | 45.8%         | 92.1%         | 2,598         | 10.8%         | 33.1%         |                          |
|   | \$100,001–\$250,000          | 30         | 25.0%         | 3.7%          | 4,681         | 19.5%         | 14.9%         |                          |
|   | \$250,001–\$1 Million        | 35         | 29.2%         | 4.2%          | 16,712        | 69.7%         | 52.0%         |                          |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>120</b> | <b>100.0%</b> | <b>100.0%</b> | <b>23,991</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 47         | 51.1%         |               | 2,369         | 13.9%         |               |                          |
|   | \$100,001–\$250,000          | 22         | 23.9%         |               | 3,162         | 18.6%         |               |                          |
|   | \$250,001–\$1 Million        | 23         | 25.0%         |               | 11,456        | 67.4%         |               |                          |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>92</b>  | <b>100.0%</b> |               | <b>16,987</b> | <b>100.0%</b> |               |                          |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |            |               |               |               |               |               |                     |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size  |                              | Count      |               |               | Dollars       |               |               | Total<br>Businesses |
|   |                              | Bank       |               | Aggregate     | Bank          |               | Aggregate     |                     |
|   |                              | #          | %             | %             | \$ (000s)     | \$ %          | \$ %          |                     |
| Business<br>Revenue   | \$1 Million or Less          | 84         | 47.7%         | 28.8%         | 16,561        | 56.6%         | 24.6%         | 90.5%               |
|   | Over \$1 Million/<br>Unknown | 92         | 52.3%         | 71.2%         | 12,695        | 43.4%         | 75.4%         | 9.5%                |
|   | <b>TOTAL</b>                 | <b>176</b> | <b>100.0%</b> | <b>100.0%</b> | <b>29,256</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>       |
| Loan Size   | \$100,000 or Less            | 90         | 51.1%         | 85.5%         | 3,887         | 13.3%         | 28.2%         |                     |
|   | \$100,001–\$250,000          | 51         | 29.0%         | 7.8%          | 8,811         | 30.1%         | 19.4%         |                     |
|   | \$250,001–\$1 Million        | 35         | 19.9%         | 6.7%          | 16,558        | 56.6%         | 52.4%         |                     |
|   | Over \$1 Million             | 0          | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                     |
|   | <b>TOTAL</b>                 | <b>176</b> | <b>100.0%</b> | <b>100.0%</b> | <b>29,256</b> | <b>100.0%</b> | <b>100.0%</b> |                     |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 41         | 48.8%         |               | 2,002         | 12.1%         |               |                     |
|   | \$100,001–\$250,000          | 21         | 25.0%         |               | 3,541         | 21.4%         |               |                     |
|   | \$250,001–\$1 Million        | 22         | 26.2%         |               | 11,018        | 66.5%         |               |                     |
|   | Over \$1 Million             | 0          | 0.0%          |               | 0             | 0.0%          |               |                     |
|   | <b>TOTAL</b>                 | <b>84</b>  | <b>100.0%</b> |               | <b>16,561</b> | <b>100.0%</b> |               |                     |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |          |               |               |            |               |               |               |
|---|------------------------------|----------|---------------|---------------|------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |               |               | Dollars    |               |               | Farms         |
|   |                              | Bank     |               | Aggregate     | Bank       |               | Aggregate     |               |
|   |                              | #        | %             | %             | \$ (000s)  | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 0        | 0.0%          | 65.0%         | 0          | 0.0%          | 69.7%         | 97.0%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%          | 35.0%         | 0          | 0.0%          | 30.3%         | 3.0%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b>   | <b>100.0%</b> | <b>0</b>   | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%          | 92.6%         | 0          | 0.0%          | 48.5%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%          | 4.9%          | 0          | 0.0%          | 24.6%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%          | 2.5%          | 0          | 0.0%          | 26.9%         |               |
|   | Over \$500,000               | 0        | 0.0%          | 0.0%          | 0          | 0.0%          | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b>   | <b>100.0%</b> | <b>0</b>   | <b>0.0%</b>   | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | Over \$1 Million             | 0        | 0.0%          |               | 0          | 0.0%          |               |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>100.0%</b> |               | <b>100</b> | <b>100.0%</b> |               |               |

## Appendix C (continued)

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |          |             |               |           |             |               |               |
|---|------------------------------|----------|-------------|---------------|-----------|-------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |             |               | Dollars   |             |               | Farms<br>%    |
|   |                              | Bank     |             | Aggregate     | Bank      |             | Aggregate     |               |
|   |                              | #        | %           | %             | \$ (000s) | \$ %        | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 0        | 0.0%        | 67.5%         | 0         | 0.0%        | 76.4%         | 97.5%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 32.5%         | 0         | 0.0%        | 23.6%         | 2.5%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 88.6%         | 0         | 0.0%        | 37.0%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 4.8%          | 0         | 0.0%        | 16.0%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%        | 6.6%          | 0         | 0.0%        | 47.1%         |               |
|   | Over \$500,000               | 0        | 0.0%        | 0.0%          | 0         | 0.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>  | <b>0.0%</b> |               |               |

## COLORADO

## Colorado Springs

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                                  |                     |               |
|--|------------|---------------|---------------|---------------|----------------------------------|---------------------|---------------|
| Census<br>Tract<br>Income<br>Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied<br>Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                                  | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                  |                     |               |
| Low  | 4          | 1.8%          | 947           | 1.4%          | 3.3%                             | 2.8%                | 2.0%          |
| Moderate   | 39         | 17.8%         | 9,599         | 14.5%         | 20.7%                            | 18.9%               | 15.0%         |
| Middle   | 102        | 46.6%         | 28,563        | 43.1%         | 42.2%                            | 45.5%               | 42.3%         |
| Upper  | 74         | 33.8%         | 27,188        | 41.0%         | 33.8%                            | 32.8%               | 40.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>219</b> | <b>100.0%</b> | <b>66,297</b> | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                  |                     |               |
| Low  | 3          | 3.4%          | 678           | 2.5%          | 3.3%                             | 2.2%                | 1.5%          |
| Moderate   | 15         | 17.2%         | 3,920         | 14.4%         | 20.7%                            | 17.1%               | 12.9%         |
| Middle   | 31         | 35.6%         | 8,596         | 31.5%         | 42.2%                            | 44.8%               | 40.9%         |
| Upper  | 38         | 43.7%         | 14,067        | 51.6%         | 33.8%                            | 35.8%               | 44.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>87</b>  | <b>100.0%</b> | <b>27,261</b> | <b>100.0%</b> | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                             | 2.0%                | 1.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                            | 17.2%               | 16.1%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 40.2%               | 37.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                            | 40.6%               | 44.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 11.7%                            | 10.1%               | 7.9%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 45.5%                            | 36.7%               | 25.4%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 27.9%                            | 29.1%               | 24.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 14.9%                            | 24.1%               | 41.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                             | 2.2%                | 1.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                            | 19.1%               | 15.7%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 42.0%               | 34.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                            | 36.8%               | 48.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                             | 2.2%                | 1.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                            | 19.1%               | 15.7%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 42.0%               | 34.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                            | 36.8%               | 48.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                                  |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                             | 2.2%                | 1.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                            | 19.1%               | 15.7%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                            | 42.0%               | 34.4%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                            | 36.8%               | 48.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                             | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                    | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 7          | 2.3%          | 1,625         | 1.7%          | 3.3%          | 2.5%          | 2.1%          |
| Moderate                  | 54         | 17.6%         | 13,519        | 14.4%         | 20.7%         | 18.2%         | 14.7%         |
| Middle                    | 133        | 43.5%         | 37,159        | 39.7%         | 42.2%         | 44.9%         | 40.6%         |
| Upper                     | 112        | 36.6%         | 41,255        | 44.1%         | 33.8%         | 34.5%         | 42.6%         |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>306</b> | <b>100.0%</b> | <b>93,558</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 6          | 2.4%          | 1,478         | 1.6%          | 3.3%                          | 2.4%                | 1.6%          |
| Moderate   | 38         | 15.1%         | 12,674        | 14.1%         | 20.7%                         | 18.2%               | 14.2%         |
| Middle   | 97         | 38.5%         | 31,852        | 35.5%         | 42.2%                         | 45.1%               | 42.0%         |
| Upper  | 111        | 44.0%         | 43,760        | 48.8%         | 33.8%                         | 34.3%               | 42.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>252</b> | <b>100.0%</b> | <b>89,764</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 2          | 0.7%          | 348           | 0.4%          | 3.3%                          | 1.9%                | 1.2%          |
| Moderate   | 33         | 12.2%         | 8,894         | 11.3%         | 20.7%                         | 14.8%               | 11.3%         |
| Middle   | 99         | 36.5%         | 25,603        | 32.7%         | 42.2%                         | 41.9%               | 37.7%         |
| Upper  | 137        | 50.6%         | 43,559        | 55.6%         | 33.8%                         | 41.4%               | 49.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>271</b> | <b>100.0%</b> | <b>78,404</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                          | 2.0%                | 1.8%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                         | 15.5%               | 13.2%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                         | 37.1%               | 30.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                         | 45.3%               | 54.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 11.7%                         | 13.2%               | 10.5%         |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 45.5%                         | 47.4%               | 41.4%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 27.9%                         | 27.6%               | 34.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 14.9%                         | 11.8%               | 13.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                          | 2.2%                | 1.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                         | 15.9%               | 12.8%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                         | 40.8%               | 35.0%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                         | 41.1%               | 50.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                          | 1.6%                | 0.8%          |
| Moderate   | 2          | 50.0%         | 227           | 28.7%         | 20.7%                         | 13.4%               | 6.8%          |
| Middle   | 1          | 25.0%         | 125           | 15.8%         | 42.2%                         | 38.3%               | 28.3%         |
| Upper  | 1          | 25.0%         | 439           | 55.5%         | 33.8%                         | 46.6%               | 64.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>791</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 3.3%                          | 5.4%                | 2.9%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 20.7%                         | 26.8%               | 18.4%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 42.2%                         | 48.2%               | 48.0%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 33.8%                         | 19.6%               | 30.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Total Home Mortgage Loans |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 8          | 1.5%          | 1,826          | 1.1%          | 3.3%          | 2.1%          | 1.6%          |
| Moderate                  | 73         | 13.9%         | 21,795         | 12.9%         | 20.7%         | 16.1%         | 13.1%         |
| Middle                    | 197        | 37.4%         | 57,580         | 34.1%         | 42.2%         | 42.9%         | 39.1%         |
| Upper                     | 249        | 47.2%         | 87,758         | 51.9%         | 33.8%         | 39.0%         | 46.1%         |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>527</b> | <b>100.0%</b> | <b>168,959</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |             |           |             |                 |                        |               |
|---|---------------------------|-------------|-----------|-------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |             |           |             | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %           | \$ (000s) | \$ %        |                 | %                      | \$ %          |
| Low   | 0                         | 0.0%        | 0         | 0.0%        | 7.7%            | 7.1%                   | 9.9%          |
| Moderate  | 0                         | 0.0%        | 0         | 0.0%        | 24.0%           | 22.7%                  | 26.2%         |
| Middle  | 0                         | 0.0%        | 0         | 0.0%        | 33.2%           | 32.1%                  | 25.8%         |
| Upper   | 0                         | 0.0%        | 0         | 0.0%        | 35.0%           | 36.9%                  | 37.0%         |
| Unknown   | 0                         | 0.0%        | 0         | 0.0%        | 0.2%            | 1.3%                   | 1.2%          |
| <b>TOTAL</b>  | <b>0</b>                  | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |            |               |                    |                        |               |
|---|---------------------------|---------------|------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |            |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)  | \$ %          |                    | %                      | \$ %          |
| Low   | 2                         | 8.3%          | 45         | 5.1%          | 7.8%               | 8.6%                   | 12.8%         |
| Moderate  | 3                         | 12.5%         | 50         | 5.7%          | 23.8%              | 24.0%                  | 26.9%         |
| Middle  | 5                         | 20.8%         | 491        | 55.8%         | 33.1%              | 29.7%                  | 24.7%         |
| Upper   | 14                        | 58.3%         | 294        | 33.4%         | 35.2%              | 37.1%                  | 35.1%         |
| Unknown   | 0                         | 0.0%          | 0          | 0.0%          | 0.2%               | 0.6%                   | 0.5%          |
| <b>TOTAL</b>  | <b>24</b>                 | <b>100.0%</b> | <b>880</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 4.9%          | 1.9%                   | 0.5%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 16.3%         | 6.6%                   | 22.4%         |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 45.3%         | 49.1%                  | 30.8%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 33.5%         | 40.6%                  | 45.0%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 0.0%          | 1.9%                   | 1.4%          |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 3.2%          | 2.7%                   | 4.6%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 15.7%         | 9.3%                   | 24.4%         |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 47.9%         | 53.3%                  | 49.3%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 33.1%         | 33.3%                  | 20.5%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 0.0%          | 1.3%                   | 1.2%          |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | %             | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 15         | 6.8%          | 2,843         | 4.3%          | 20.4%                             | 4.0%                | 2.3%          |
| Moderate   | 53         | 24.2%         | 12,904        | 19.5%         | 18.5%                             | 22.0%               | 17.3%         |
| Middle   | 61         | 27.9%         | 18,105        | 27.3%         | 20.3%                             | 26.1%               | 24.9%         |
| Upper  | 90         | 41.1%         | 32,445        | 48.9%         | 40.8%                             | 32.3%               | 39.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 15.5%               | 16.1%         |
| <b>TOTAL</b>   | <b>219</b> | <b>100.0%</b> | <b>66,297</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 2          | 2.3%          | 270           | 1.0%          | 20.4%                             | 6.1%                | 3.6%          |
| Moderate   | 13         | 14.9%         | 3,112         | 11.4%         | 18.5%                             | 13.6%               | 10.1%         |
| Middle   | 21         | 24.1%         | 5,363         | 19.7%         | 20.3%                             | 18.0%               | 16.1%         |
| Upper  | 32         | 36.8%         | 11,946        | 43.8%         | 40.8%                             | 25.6%               | 29.7%         |
| Unknown  | 19         | 21.8%         | 6,570         | 24.1%         | 0.0%                              | 36.7%               | 40.5%         |
| <b>TOTAL</b>   | <b>87</b>  | <b>100.0%</b> | <b>27,261</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 8.9%                | 6.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 16.3%               | 14.1%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 22.2%               | 19.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 50.5%               | 55.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 2.2%                | 4.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 2.5%                | 0.1%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 97.5%               | 99.9%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 11.5%               | 8.4%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 16.4%               | 12.3%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 23.2%               | 20.2%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 48.5%               | 58.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 0.5%                | 0.8%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 8.0%                | 5.8%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 17.0%               | 10.6%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 22.3%               | 19.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 47.2%               | 53.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 5.6%                | 10.0%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 0.3%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 0.5%                | 0.4%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 2.3%                | 4.7%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 96.9%               | 94.8%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |            |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|------------|
| Low                       | 17         | 5.6%          | 3,113         | 20.4%         | 5.4%          | 2.8%          | 17         |
| Moderate                  | 66         | 21.6%         | 16,016        | 18.5%         | 17.7%         | 13.0%         | 66         |
| Middle                    | 82         | 26.8%         | 23,468        | 20.3%         | 22.0%         | 19.4%         | 82         |
| Upper                     | 122        | 39.9%         | 44,391        | 40.8%         | 30.5%         | 33.2%         | 122        |
| Unknown                   | 19         | 6.2%          | 6,570         | 0.0%          | 24.4%         | 31.4%         | 19         |
| <b>TOTAL</b>              | <b>306</b> | <b>100.0%</b> | <b>93,558</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>306</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 10         | 4.0%          | 2,131         | 2.4%          | 20.4%                             | 3.2%                | 1.8%          |
| Moderate   | 53         | 21.0%         | 15,213        | 16.9%         | 18.5%                             | 21.4%               | 16.9%         |
| Middle   | 70         | 27.8%         | 23,062        | 25.7%         | 20.3%                             | 26.4%               | 24.9%         |
| Upper  | 116        | 46.0%         | 48,681        | 54.2%         | 40.8%                             | 34.2%               | 41.0%         |
| Unknown  | 3          | 1.2%          | 677           | 0.8%          | 0.0%                              | 14.8%               | 15.4%         |
| <b>TOTAL</b>   | <b>252</b> | <b>100.0%</b> | <b>89,764</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 10         | 3.7%          | 1,500         | 1.9%          | 20.4%                             | 4.0%                | 2.2%          |
| Moderate   | 40         | 14.8%         | 9,171         | 11.7%         | 18.5%                             | 12.2%               | 9.0%          |
| Middle   | 81         | 29.9%         | 22,715        | 29.0%         | 20.3%                             | 16.0%               | 14.1%         |
| Upper  | 111        | 41.0%         | 35,935        | 45.8%         | 40.8%                             | 27.2%               | 30.4%         |
| Unknown  | 29         | 10.7%         | 9,083         | 11.6%         | 0.0%                              | 40.6%               | 44.3%         |
| <b>TOTAL</b>   | <b>271</b> | <b>100.0%</b> | <b>78,404</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 3.7%                | 3.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 14.0%               | 10.8%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 22.0%               | 17.9%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 57.6%               | 62.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 2.8%                | 5.5%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 9.2%                | 0.6%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 90.8%               | 99.4%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 20.4%                             | 5.4%                | 3.2%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 15.8%               | 11.8%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.3%                             | 24.1%               | 20.6%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 40.8%                             | 54.3%               | 63.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 0.4%                | 0.5%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 1          | 25.0%         | 125           | 15.8%         | 20.4%                             | 5.9%                | 3.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.5%                             | 19.4%               | 16.2%         |
| Middle   | 1          | 25.0%         | 81            | 10.2%         | 20.3%                             | 23.3%               | 19.1%         |
| Upper  | 1          | 25.0%         | 146           | 18.5%         | 40.8%                             | 43.9%               | 54.0%         |
| Unknown  | 1          | 25.0%         | 439           | 55.5%         | 0.0%                              | 7.5%                | 7.7%          |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>791</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |            |               |                |               |               |               |               |
|---------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0              | 0.0%          | 20.4%         | 0.1%          | 0.1%          |
| Moderate                  | 0          | 0.0%          | 0              | 0.0%          | 18.5%         | 0.1%          | 0.1%          |
| Middle                    | 0          | 0.0%          | 0              | 0.0%          | 20.3%         | 0.0%          | 0.0%          |
| Upper                     | 0          | 0.0%          | 0              | 0.0%          | 40.8%         | 0.2%          | 0.3%          |
| Unknown                   | 0          | 0.0%          | 0              | 0.0%          | 0.0%          | 99.5%         | 99.5%         |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>       | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |                |               |               |               |               |
| Low                       | 21         | 4.0%          | 3,756          | 2.2%          | 20.4%         | 3.7%          | 2.0%          |
| Moderate                  | 93         | 17.6%         | 24,384         | 14.4%         | 18.5%         | 15.2%         | 11.6%         |
| Middle                    | 152        | 28.8%         | 45,858         | 27.1%         | 20.3%         | 19.5%         | 17.6%         |
| Upper                     | 228        | 43.3%         | 84,762         | 50.2%         | 40.8%         | 30.7%         | 33.9%         |
| Unknown                   | 33         | 6.3%          | 10,199         | 6.0%          | 0.0%          | 30.8%         | 34.9%         |
| <b>TOTAL</b>              | <b>527</b> | <b>100.0%</b> | <b>168,959</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |          |             |               |              |             |                  |           |               |
|---|------------------------------|----------|-------------|---------------|--------------|-------------|------------------|-----------|---------------|
| Business Revenue and Loan Size  |                              | Count    |             |               | Dollars      |             | Total Businesses |           |               |
|   |                              | Bank     |             | Aggregate     | Bank         |             |                  | Aggregate |               |
|   |                              | #        | %           | %             | \$<br>(000s) | \$ %        | \$ %             | %         |               |
| Business<br>Revenue   | \$1 Million or Less          | 0        | 0.0%        | 54.9%         | 0            | 0.0%        | 39.5%            | 94.2%     |               |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 45.1%         | 0            | 0.0%        | 60.5%            |           | 5.8%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>     | <b>0.0%</b> | <b>100.0%</b>    |           | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 96.6%         | 0            | 0.0%        | 50.7%            |           |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 1.6%          | 0            | 0.0%        | 10.8%            |           |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        | 1.8%          | 0            | 0.0%        | 38.5%            |           |               |
|   | Over \$1 Million             | 0        | 0.0%        | 0.0%          | 0            | 0.0%        | 0.0%             |           |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>     | <b>0.0%</b> | <b>100.0%</b>    |           |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 0        | 0.0%        |               | 0            | 0.0%        |                  |           |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0            | 0.0%        |                  |           |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0            | 0.0%        |                  |           |               |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0            | 0.0%        |                  |           |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>     | <b>0.0%</b> |                  |           |               |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |           |               |               |              |               |               |                  |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------|------------------|
| Business Revenue and Loan Size  |                              | Count     |               |               | Dollars      |               |               | Total Businesses |
|   |                              | Bank      |               | Aggregate     | Bank         |               | Aggregate     |                  |
|   |                              | #         | %             | %             | \$<br>(000s) | \$ %          | \$ %          | %                |
| Business Revenue  | \$1 Million or Less          | 2         | 8.3%          | 43.9%         | 385          | 43.8%         | 25.6%         | 94.4%            |
|   | Over \$1 Million/<br>Unknown | 22        | 91.7%         | 56.1%         | 495          | 56.3%         | 74.4%         | 5.6%             |
|   | <b>TOTAL</b>                 | <b>24</b> | <b>100.0%</b> | <b>100.0%</b> | <b>880</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>    |
| Loan Size   | \$100,000 or Less            | 23        | 95.8%         | 90.6%         | 525          | 59.7%         | 38.0%         |                  |
|   | \$100,001–\$250,000          | 0         | 0.0%          | 5.7%          | 0            | 0.0%          | 20.2%         |                  |
|   | \$250,001–\$1 Million        | 1         | 4.2%          | 3.7%          | 355          | 40.3%         | 41.8%         |                  |
|   | Over \$1 Million             | 0         | 0.0%          | 0.0%          | 0            | 0.0%          | 0.0%          |                  |
|   | <b>TOTAL</b>                 | <b>24</b> | <b>100.0%</b> | <b>100.0%</b> | <b>880</b>   | <b>100.0%</b> | <b>100.0%</b> |                  |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 1         | 50.0%         |               | 30           | 7.8%          |               |                  |
|   | \$100,001–\$250,000          | 0         | 0.0%          |               | 0            | 0.0%          |               |                  |
|   | \$250,001–\$1 Million        | 1         | 50.0%         |               | 355          | 92.2%         |               |                  |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0            | 0.0%          |               |                  |
|   | <b>TOTAL</b>                 | <b>2</b>  | <b>100.0%</b> |               | <b>385</b>   | <b>100.0%</b> |               |                  |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |          |             |               |           |             |               |               |
|---|------------------------------|----------|-------------|---------------|-----------|-------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |             |               | Dollars   |             |               | Farms         |
|   |                              | Bank     |             | Aggregate     | Bank      |             | Aggregate     |               |
|   |                              | #        | %           | %             | \$ (000s) | \$ %        | \$ %          | %             |
| Farm Revenue  | \$1 Million or Less          | 0        | 0.0%        | 65.1%         | 0         | 0.0%        | 65.0%         | 98.7%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 34.9%         | 0         | 0.0%        | 35.0%         | 1.3%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 97.2%         | 0         | 0.0%        | 63.6%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 0.9%          | 0         | 0.0%        | 5.7%          |               |
|   | \$250,001–\$500,000          | 0        | 0.0%        | 1.9%          | 0         | 0.0%        | 30.7%         |               |
|   | Over \$500,000               | 0        | 0.0%        | 0.0%          | 0         | 0.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>  | <b>0.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |          |             |               |           |             |               |               |
|---|------------------------------|----------|-------------|---------------|-----------|-------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |             |               | Dollars   |             |               | Farms<br>%    |
|   |                              | Bank     |             | Aggregate     | Bank      |             | Aggregate     |               |
|   |                              | #        | %           | %             | \$ (000s) | \$ %        | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 0        | 0.0%        | 57.3%         | 0         | 0.0%        | 40.1%         | 98.6%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 42.7%         | 0         | 0.0%        | 59.9%         | 1.4%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 96.0%         | 0         | 0.0%        | 70.9%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 2.7%          | 0         | 0.0%        | 16.2%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%        | 1.3%          | 0         | 0.0%        | 12.9%         |               |
|   | Over \$500,000               | 0        | 0.0%        | 0.0%          | 0         | 0.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>  | <b>0.0%</b> |               |               |

## Denver

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |              |               |                               |                     |               |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)    | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 2          | 13.3%         | 959          | 18.3%         | 5.6%                          | 6.3%                | 5.2%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 22.6%                         | 23.4%               | 18.7%         |
| Middle   | 9          | 60.0%         | 3,132        | 59.8%         | 36.4%                         | 35.8%               | 33.3%         |
| Upper  | 4          | 26.7%         | 1,146        | 21.9%         | 35.5%                         | 34.4%               | 42.8%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>15</b>  | <b>100.0%</b> | <b>5,237</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                               |                     |               |
| Low  | 1          | 6.7%          | 179          | 3.6%          | 5.6%                          | 5.1%                | 4.1%          |
| Moderate   | 3          | 20.0%         | 715          | 14.5%         | 22.6%                         | 22.8%               | 18.2%         |
| Middle   | 4          | 26.7%         | 1,034        | 20.9%         | 36.4%                         | 37.1%               | 34.6%         |
| Upper  | 7          | 46.7%         | 3,015        | 61.0%         | 35.5%                         | 34.9%               | 43.0%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>15</b>  | <b>100.0%</b> | <b>4,943</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.6%                          | 4.0%                | 3.2%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 22.6%                         | 18.0%               | 14.0%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 36.4%                         | 36.6%               | 33.5%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.5%                         | 41.4%               | 49.2%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.1%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 14.7%                         | 20.6%               | 13.1%         |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 32.3%                         | 31.7%               | 27.3%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 35.4%                         | 33.0%               | 36.6%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 17.6%                         | 14.7%               | 23.0%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.6%                          | 3.9%                | 3.1%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 22.6%                         | 17.7%               | 12.2%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 36.4%                         | 37.5%               | 31.4%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.5%                         | 40.9%               | 53.3%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.6%                          | 4.4%                | 2.4%          |
| Moderate   | 1          | 100.0%        | 30           | 100.0%        | 22.6%                         | 23.0%               | 14.3%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 36.4%                         | 36.5%               | 27.3%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.5%                         | 36.0%               | 55.9%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>30</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 5.6%                          | 8.1%                | 4.4%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 22.6%                         | 27.0%               | 28.8%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 36.4%                         | 37.7%               | 30.7%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 35.5%                         | 27.0%               | 35.8%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                          | 0.1%                | 0.2%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 3         | 9.7%          | 1,138         | 11.1%         | 5.6%          | 5.5%          | 5.1%          |
| Moderate                  | 4         | 12.9%         | 745           | 7.3%          | 22.6%         | 22.7%         | 18.9%         |
| Middle                    | 13        | 41.9%         | 4,166         | 40.8%         | 36.4%         | 36.6%         | 34.1%         |
| Upper                     | 11        | 35.5%         | 4,161         | 40.8%         | 35.5%         | 35.2%         | 41.8%         |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>31</b> | <b>100.0%</b> | <b>10,210</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | ##%           | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 6.5%                | 5.5%          |
| Moderate   | 8          | 38.1%         | 2,326         | 34.8%         | 22.6%                         | 23.6%               | 18.9%         |
| Middle   | 4          | 19.0%         | 1,161         | 17.4%         | 36.4%                         | 36.2%               | 33.9%         |
| Upper  | 9          | 42.9%         | 3,201         | 47.9%         | 35.5%                         | 33.7%               | 41.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>21</b>  | <b>100.0%</b> | <b>6,688</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 5          | 8.6%          | 1,745         | 9.2%          | 5.6%                          | 4.5%                | 3.8%          |
| Moderate   | 7          | 12.1%         | 2,017         | 10.7%         | 22.6%                         | 19.4%               | 15.8%         |
| Middle   | 25         | 43.1%         | 7,387         | 39.0%         | 36.4%                         | 35.9%               | 33.2%         |
| Upper  | 21         | 36.2%         | 7,788         | 41.1%         | 35.5%                         | 40.1%               | 47.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>58</b>  | <b>100.0%</b> | <b>18,937</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 4.0%                | 3.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 22.6%                         | 16.5%               | 13.7%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 36.4%                         | 32.8%               | 27.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.5%                         | 46.6%               | 54.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 14.7%                         | 16.1%               | 7.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 32.3%                         | 29.4%               | 30.8%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 35.4%                         | 36.4%               | 46.9%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 17.6%                         | 18.1%               | 15.1%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 4.3%                | 3.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 22.6%                         | 14.7%               | 10.2%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 36.4%                         | 33.6%               | 28.1%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.5%                         | 47.4%               | 58.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 4.3%                | 3.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 22.6%                         | 14.7%               | 10.2%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 36.4%                         | 33.6%               | 28.1%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.5%                         | 47.4%               | 58.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 5.6%                          | 4.3%                | 3.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 22.6%                         | 14.7%               | 10.2%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 36.4%                         | 33.6%               | 28.1%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 35.5%                         | 47.4%               | 58.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 5         | 6.3%          | 1,745         | 6.8%          | 5.6%          | 5.1%          | 4.4%          |
| Moderate                  | 15        | 19.0%         | 4,343         | 16.9%         | 22.6%         | 20.6%         | 17.2%         |
| Middle                    | 29        | 36.7%         | 8,548         | 33.4%         | 36.4%         | 35.8%         | 33.7%         |
| Upper                     | 30        | 38.0%         | 10,989        | 42.9%         | 35.5%         | 38.5%         | 44.7%         |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>79</b> | <b>100.0%</b> | <b>25,625</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |               |              |               |                 |                        |               |
|---|---------------------------|---------------|--------------|---------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |              |               | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)    | \$ %          |                 | %                      | \$ %          |
| Low   | 1                         | 10.0%         | 1,000        | 32.1%         | 8.2%            | 9.2%                   | 12.2%         |
| Moderate  | 3                         | 30.0%         | 1,057        | 33.9%         | 22.0%           | 21.9%                  | 23.0%         |
| Middle  | 4                         | 40.0%         | 1,036        | 33.2%         | 32.6%           | 30.7%                  | 29.1%         |
| Upper   | 2                         | 20.0%         | 23           | 0.7%          | 36.7%           | 36.7%                  | 34.1%         |
| Unknown   | 0                         | 0.0%          | 0            | 0.0%          | 0.4%            | 1.4%                   | 1.6%          |
| <b>TOTAL</b>  | <b>10</b>                 | <b>100.0%</b> | <b>3,116</b> | <b>100.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |               |               |                    |                        |               |
|---|---------------------------|---------------|---------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |               |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)     | \$ %          |                    | %                      | \$ %          |
| Low   | 4                         | 4.2%          | 231           | 1.9%          | 8.3%               | 9.2%                   | 12.4%         |
| Moderate  | 24                        | 25.0%         | 2,176         | 17.7%         | 22.0%              | 21.7%                  | 23.4%         |
| Middle  | 26                        | 27.1%         | 1,614         | 13.1%         | 32.7%              | 31.0%                  | 28.7%         |
| Upper   | 41                        | 42.7%         | 8,278         | 67.2%         | 36.7%              | 37.3%                  | 34.2%         |
| Unknown   | 1                         | 1.0%          | 26            | 0.2%          | 0.4%               | 0.8%                   | 1.2%          |
| <b>TOTAL</b>  | <b>96</b>                 | <b>100.0%</b> | <b>12,325</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 8.8%          | 7.7%                   | 8.3%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 15.9%         | 9.0%                   | 5.3%          |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 35.8%         | 41.3%                  | 46.8%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 38.2%         | 40.7%                  | 38.5%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 1.3%          | 1.3%                   | 1.2%          |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 7.8%          | 8.4%                   | 5.3%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 16.3%         | 10.6%                  | 9.1%          |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 36.7%         | 43.4%                  | 47.5%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 38.0%         | 35.8%                  | 36.9%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 1.3%          | 1.8%                   | 1.3%          |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |              |               |                                   |                     |               |
|--|------------|---------------|--------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |              |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)    | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 23.6%                             | 4.7%                | 2.4%          |
| Moderate   | 1          | 6.7%          | 373          | 7.1%          | 18.7%                             | 22.1%               | 16.0%         |
| Middle   | 6          | 40.0%         | 1,767        | 33.7%         | 20.6%                             | 24.2%               | 22.2%         |
| Upper  | 7          | 46.7%         | 2,781        | 53.1%         | 37.1%                             | 34.8%               | 44.7%         |
| Unknown  | 1          | 6.7%          | 316          | 6.0%          | 0.0%                              | 14.3%               | 14.8%         |
| <b>TOTAL</b>   | <b>15</b>  | <b>100.0%</b> | <b>5,237</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 23.6%                             | 7.4%                | 4.2%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.7%                             | 19.0%               | 14.3%         |
| Middle   | 5          | 33.3%         | 1,609        | 32.6%         | 20.6%                             | 22.4%               | 20.7%         |
| Upper  | 6          | 40.0%         | 2,440        | 49.4%         | 37.1%                             | 31.9%               | 40.1%         |
| Unknown  | 4          | 26.7%         | 894          | 18.1%         | 0.0%                              | 19.4%               | 20.6%         |
| <b>TOTAL</b>   | <b>15</b>  | <b>100.0%</b> | <b>4,943</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 23.6%                             | 6.1%                | 4.5%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.7%                             | 17.0%               | 13.4%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.6%                             | 24.8%               | 20.3%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 37.1%                             | 49.1%               | 56.6%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 3.0%                | 5.1%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 23.6%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.7%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.6%                             | 0.9%                | 0.1%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 37.1%                             | 1.6%                | 0.3%          |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 97.5%               | 99.7%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 23.6%                             | 7.3%                | 4.5%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.7%                             | 19.1%               | 11.6%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.6%                             | 25.1%               | 19.2%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 37.1%                             | 46.8%               | 62.9%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 1.6%                | 1.7%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |              |               |                                   |                     |               |
| Low  | 1          | 100.0%        | 30           | 100.0%        | 23.6%                             | 10.1%               | 5.9%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.7%                             | 19.6%               | 10.5%         |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.6%                             | 24.1%               | 13.3%         |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 37.1%                             | 40.5%               | 58.6%         |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 5.7%                | 11.7%         |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>30</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |              |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0            | 0.0%          | 23.6%                             | 0.3%                | 0.3%          |
| Moderate   | 0          | 0.0%          | 0            | 0.0%          | 18.7%                             | 1.1%                | 0.9%          |
| Middle   | 0          | 0.0%          | 0            | 0.0%          | 20.6%                             | 2.4%                | 2.9%          |
| Upper  | 0          | 0.0%          | 0            | 0.0%          | 37.1%                             | 3.6%                | 4.4%          |
| Unknown  | 0          | 0.0%          | 0            | 0.0%          | 0.0%                              | 92.5%               | 91.5%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>     | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 1         | 3.2%          | 30            | 0.3%          | 23.6%         | 6.3%          | 3.2%          |
| Moderate                  | 1         | 3.2%          | 373           | 3.7%          | 18.7%         | 19.9%         | 13.9%         |
| Middle                    | 11        | 35.5%         | 3,376         | 33.1%         | 20.6%         | 23.1%         | 19.7%         |
| Upper                     | 13        | 41.9%         | 5,221         | 51.1%         | 37.1%         | 34.3%         | 39.7%         |
| Unknown                   | 5         | 16.1%         | 1,210         | 11.9%         | 0.0%          | 16.4%         | 23.4%         |
| <b>TOTAL</b>              | <b>31</b> | <b>100.0%</b> | <b>10,210</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family Income<br>% | Aggregate HMDA Data |               |
|  | #          | %             | \$ (000s)     | %             |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 1          | 4.8%          | 305           | 4.6%          | 23.6%                             | 6.1%                | 3.2%          |
| Moderate   | 5          | 23.8%         | 1,657         | 24.8%         | 18.7%                             | 25.1%               | 19.0%         |
| Middle   | 6          | 28.6%         | 2,063         | 30.8%         | 20.6%                             | 24.8%               | 23.8%         |
| Upper  | 5          | 23.8%         | 1,633         | 24.4%         | 37.1%                             | 33.6%               | 43.0%         |
| Unknown  | 4          | 19.0%         | 1,030         | 15.4%         | 0.0%                              | 10.4%               | 11.0%         |
| <b>TOTAL</b>   | <b>21</b>  | <b>100.0%</b> | <b>6,688</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 2          | 3.4%          | 347           | 1.8%          | 23.6%                             | 6.7%                | 4.0%          |
| Moderate   | 15         | 25.9%         | 4,482         | 23.7%         | 18.7%                             | 18.8%               | 14.7%         |
| Middle   | 20         | 34.5%         | 6,932         | 36.6%         | 20.6%                             | 22.8%               | 21.6%         |
| Upper  | 19         | 32.8%         | 6,476         | 34.2%         | 37.1%                             | 34.9%               | 42.0%         |
| Unknown  | 2          | 3.4%          | 700           | 3.7%          | 0.0%                              | 16.7%               | 17.8%         |
| <b>TOTAL</b>   | <b>58</b>  | <b>100.0%</b> | <b>18,937</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 23.6%                             | 6.0%                | 4.7%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 16.0%               | 11.5%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.6%                             | 23.3%               | 19.5%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 37.1%                             | 50.6%               | 56.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 4.0%                | 7.4%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 23.6%                             | 0.3%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.6%                             | 0.3%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 37.1%                             | 1.3%                | 0.2%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 98.2%               | 99.7%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 23.6%                             | 6.4%                | 3.9%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 15.9%               | 10.6%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.6%                             | 23.5%               | 17.8%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 37.1%                             | 52.5%               | 65.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 1.8%                | 2.3%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 23.6%                             | 8.9%                | 3.5%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 18.7%                             | 19.0%               | 9.5%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.6%                             | 21.0%               | 12.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 37.1%                             | 43.3%               | 60.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 7.8%                | 14.2%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |           |               |               |               |               |               |               |
|---------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0         | 0.0%          | 0             | 0.0%          | 23.6%         | 0.2%          | 0.1%          |
| Moderate                  | 0         | 0.0%          | 0             | 0.0%          | 18.7%         | 0.1%          | 0.0%          |
| Middle                    | 0         | 0.0%          | 0             | 0.0%          | 20.6%         | 0.0%          | 0.0%          |
| Upper                     | 0         | 0.0%          | 0             | 0.0%          | 37.1%         | 0.0%          | 0.1%          |
| Unknown                   | 0         | 0.0%          | 0             | 0.0%          | 0.0%          | 99.7%         | 99.8%         |
| <b>TOTAL</b>              | <b>0</b>  | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |           |               |               |               |               |               |               |
| Low                       | 3         | 3.8%          | 652           | 2.5%          | 23.6%         | 6.4%          | 3.6%          |
| Moderate                  | 20        | 25.3%         | 6,139         | 24.0%         | 18.7%         | 20.2%         | 15.3%         |
| Middle                    | 26        | 32.9%         | 8,995         | 35.1%         | 20.6%         | 23.1%         | 21.3%         |
| Upper                     | 24        | 30.4%         | 8,109         | 31.6%         | 37.1%         | 35.0%         | 41.1%         |
| Unknown                   | 6         | 7.6%          | 1,730         | 6.8%          | 0.0%          | 15.3%         | 18.7%         |
| <b>TOTAL</b>              | <b>79</b> | <b>100.0%</b> | <b>25,625</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |           |               |               |              |               |                     |           |               |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------------|-----------|---------------|
| Business Revenue and Loan Size  |                              | Count     |               |               | Dollars      |               | Total<br>Businesses |           |               |
|   |                              | Bank      |               | Aggregate     | Bank         |               |                     | Aggregate |               |
|   |                              | #         | %             | %             | \$<br>(000s) | \$ %          | \$ %                | %         |               |
| Business<br>Revenue   | \$1 Million or Less          | 7         | 70.0%         | 51.9%         | 1,309        | 42.0%         | 33.7%               | 92.0%     |               |
|   | Over \$1 Million/<br>Unknown | 3         | 30.0%         | 48.1%         | 1,807        | 58.0%         | 66.3%               |           | 8.0%          |
|   | <b>TOTAL</b>                 | <b>10</b> | <b>100.0%</b> | <b>100.0%</b> | <b>3,116</b> | <b>100.0%</b> | <b>100.0%</b>       |           | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 4         | 40.0%         | 94.6%         | 43           | 1.4%          | 40.5%               |           |               |
|   | \$100,001–\$250,000          | 1         | 10.0%         | 2.4%          | 250          | 8.0%          | 12.0%               |           |               |
|   | \$250,001–\$1 Million        | 5         | 50.0%         | 3.0%          | 2,823        | 90.6%         | 47.5%               |           |               |
|   | Over \$1 Million             | 0         | 0.0%          | 0.0%          | 0            | 0.0%          | 0.0%                |           |               |
|   | <b>TOTAL</b>                 | <b>10</b> | <b>100.0%</b> | <b>100.0%</b> | <b>3,116</b> | <b>100.0%</b> | <b>100.0%</b>       |           |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 4         | 57.1%         |               | 43           | 3.3%          |                     |           |               |
|   | \$100,001–\$250,000          | 1         | 14.3%         |               | 250          | 19.1%         |                     |           |               |
|   | \$250,001–\$1 Million        | 2         | 28.6%         |               | 1,016        | 77.6%         |                     |           |               |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0            | 0.0%          |                     |           |               |
|   | <b>TOTAL</b>                 | <b>7</b>  | <b>100.0%</b> |               | <b>1,309</b> | <b>100.0%</b> |                     |           |               |

## Appendix C (continued)

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |           |               |               |               |               |               |                     |
|---|------------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size  |                              | Count     |               |               | Dollars       |               |               | Total<br>Businesses |
|   |                              | Bank      |               | Aggregate     | Bank          |               | Aggregate     |                     |
|   |                              | #         | %             | %             | \$<br>(000s)  | \$ %          | \$ %          | %                   |
| Business<br>Revenue   | \$1 Million or Less          | 15        | 15.6%         | 40.6%         | 6,883         | 55.8%         | 22.5%         | 92.3%               |
|   | Over \$1 Million/<br>Unknown | 81        | 84.4%         | 59.4%         | 5,442         | 44.2%         | 77.5%         | 7.7%                |
|   | <b>TOTAL</b>                 | <b>96</b> | <b>100.0%</b> | <b>100.0%</b> | <b>12,325</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>       |
| Loan Size   | \$100,000 or Less            | 68        | 70.8%         | 87.2%         | 1,753         | 14.2%         | 31.6%         |                     |
|   | \$100,001–\$250,000          | 13        | 13.5%         | 7.1%          | 2,004         | 16.3%         | 19.5%         |                     |
|   | \$250,001–\$1 Million        | 15        | 15.6%         | 5.6%          | 8,568         | 69.5%         | 48.9%         |                     |
|   | Over \$1 Million             | 0         | 0.0%          | 0.0%          | 0             | 0.0%          | 0.0%          |                     |
|   | <b>TOTAL</b>                 | <b>96</b> | <b>100.0%</b> | <b>100.0%</b> | <b>12,325</b> | <b>100.0%</b> | <b>100.0%</b> |                     |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 2         | 13.3%         |               | 23            | 0.3%          |               |                     |
|   | \$100,001–\$250,000          | 2         | 13.3%         |               | 350           | 5.1%          |               |                     |
|   | \$250,001–\$1 Million        | 11        | 73.3%         |               | 6,510         | 94.6%         |               |                     |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0             | 0.0%          |               |                     |
|   | <b>TOTAL</b>                 | <b>15</b> | <b>100.0%</b> |               | <b>6,883</b>  | <b>100.0%</b> |               |                     |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |          |             |               |           |             |               |               |
|---|------------------------------|----------|-------------|---------------|-----------|-------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |             |               | Dollars   |             |               | Farms         |
|   |                              | Bank     |             | Aggregate     | Bank      |             | Aggregate     |               |
|   |                              | #        | %           | %             | \$ (000s) | \$ %        | \$ %          | %             |
| Farm<br>Revenue   | \$1 Million or Less          | 0        | 0.0%        | 66.3%         | 0         | 0.0%        | 71.4%         | 97.4%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 33.7%         | 0         | 0.0%        | 28.6%         | 2.6%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 88.8%         | 0         | 0.0%        | 35.0%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 7.4%          | 0         | 0.0%        | 31.2%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%        | 3.8%          | 0         | 0.0%        | 33.8%         |               |
|   | Over \$500,000               | 0        | 0.0%        | 0.0%          | 0         | 0.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>  | <b>0.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                                |                       |             |               |           |             |               |               |
|---|--------------------------------|-----------------------|-------------|---------------|-----------|-------------|---------------|---------------|
| Farm Revenue and Loan Size  |                                | Count                 |             |               | Dollars   |             |               | Farms<br>%    |
|   |                                | Bank                  |             | Aggregate     | Bank      |             | Aggregate     |               |
|   |                                | #                     | %           | %             | \$ (000s) | \$ %        | \$ %          |               |
| Farm Revenue  | \$1 Million or Less            | 0                     | 0.0%        | 56.6%         | 0         | 0.0%        | 55.5%         | 97.5%         |
|   | Over \$1 Million/<br>Unknown   | 0                     | 0.0%        | 43.4%         | 0         | 0.0%        | 44.5%         | 2.5%          |
|   | <b>TOTAL</b>                   | <b>0</b>              | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less              | 0                     | 0.0%        | 88.9%         | 0         | 0.0%        | 43.0%         |               |
|   | \$100,001–\$250,000            | 0                     | 0.0%        | 6.2%          | 0         | 0.0%        | 20.2%         |               |
|   | \$250,001–\$500,000            | 0                     | 0.0%        | 4.9%          | 0         | 0.0%        | 36.8%         |               |
|   | Over \$500,000                 | 0                     | 0.0%        | 0.0%          | 0         | 0.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                   | <b>0</b>              | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> |               |
| Loan Size   | Revenue \$1 Million<br>or Less | \$100,000 or Less     | 0           | 0.0%          |           | 0           | 0.0%          |               |
|   |                                | \$100,001–\$250,000   | 0           | 0.0%          |           | 0           | 0.0%          |               |
|   |                                | \$250,001–\$1 Million | 0           | 0.0%          |           | 0           | 0.0%          |               |
|   |                                | Over \$1 Million      | 0           | 0.0%          |           | 0           | 0.0%          |               |
|   |                                | <b>TOTAL</b>          | <b>0</b>    | <b>0.0%</b>   |           | <b>0</b>    | <b>0.0%</b>   |               |

## Durango

| Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | %             | \$ (000s)     | %             |                               | #                   | %             |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 11         | 12.0%         | 3,873         | 12.5%         | 22.7%                         | 17.2%               | 16.4%         |
| Upper  | 81         | 88.0%         | 27,041        | 87.5%         | 77.3%                         | 82.8%               | 83.6%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>92</b>  | <b>100.0%</b> | <b>30,914</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 7          | 23.3%         | 2,329         | 21.3%         | 22.7%                         | 20.3%               | 19.6%         |
| Upper  | 23         | 76.7%         | 8,629         | 78.7%         | 77.3%                         | 79.7%               | 80.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>30</b>  | <b>100.0%</b> | <b>10,958</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 12.5%               | 9.7%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 77.3%                         | 87.5%               | 90.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 41.8%                         | 41.7%               | 50.0%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 58.2%                         | 58.3%               | 50.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 8.2%                | 4.1%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 77.3%                         | 91.8%               | 95.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 15.6%               | 13.5%         |
| Upper  | 1          | 100.0%        | 97            | 100.0%        | 77.3%                         | 84.4%               | 86.5%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>97</b>     | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 30.8%               | 23.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 77.3%                         | 69.2%               | 76.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Middle                    | 18         | 14.6%         | 6,202         | 14.8%         | 22.7%         | 18.3%         | 18.7%         |
| Upper                     | 105        | 85.4%         | 35,767        | 85.2%         | 77.3%         | 81.7%         | 81.3%         |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>123</b> | <b>100.0%</b> | <b>41,969</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Income Level of Geography |            |               |               |               |                               |                     |               |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | % of Owner-<br>Occupied Units | Aggregate HMDA Data |               |
|  | #          | #%            | \$ (000s)     | \$ %          |                               | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 14         | 12.6%         | 4,736         | 12.1%         | 22.7%                         | 15.8%               | 14.2%         |
| Upper  | 97         | 87.4%         | 34,463        | 87.9%         | 77.3%                         | 84.2%               | 85.8%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>111</b> | <b>100.0%</b> | <b>39,199</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 24         | 19.0%         | 7,523         | 17.5%         | 22.7%                         | 17.2%               | 16.7%         |
| Upper  | 102        | 81.0%         | 35,577        | 82.5%         | 77.3%                         | 82.8%               | 83.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>126</b> | <b>100.0%</b> | <b>43,100</b> | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 1          | 25.0%         | 205           | 14.1%         | 22.7%                         | 23.8%               | 24.1%         |
| Upper  | 3          | 75.0%         | 1,247         | 85.9%         | 77.3%                         | 76.3%               | 75.9%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>1,452</b>  | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 41.8%                         | 37.5%               | 58.7%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 58.2%                         | 62.5%               | 41.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 15.7%               | 14.7%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 77.3%                         | 84.3%               | 85.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>   |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 9.5%                | 5.6%          |
| Upper  | 4          | 100.0%        | 920           | 100.0%        | 77.3%                         | 90.5%               | 94.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>920</b>    | <b>100.0%</b> | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                               |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 22.7%                         | 30.2%               | 27.0%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 77.3%                         | 69.8%               | 73.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                          | 0.0%                | 0.0%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                 | <b>100.0%</b>       | <b>100.0%</b> |



## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| Middle                    | 39         | 15.9%         | 12,464        | 14.7%         | 22.7%         | 16.9%         | 16.4%         |
| Upper                     | 206        | 84.1%         | 72,207        | 85.3%         | 77.3%         | 83.1%         | 83.6%         |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 0.0%          | 0.0%          |
| <b>TOTAL</b>              | <b>245</b> | <b>100.0%</b> | <b>84,671</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Income Level of Geography |                           |             |           |             |                 |                        |               |
|---|---------------------------|-------------|-----------|-------------|-----------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |             |           |             | % of Businesses | Aggregate of Peer Data |               |
|   | #                         | %           | \$ (000s) | \$ %        |                 | %                      | \$ %          |
| Low   | 0                         | 0.0%        | 0         | 0.0%        | 0.0%            | 0.0%                   | 0.0%          |
| Moderate  | 0                         | 0.0%        | 0         | 0.0%        | 0.0%            | 0.0%                   | 0.0%          |
| Middle  | 0                         | 0.0%        | 0         | 0.0%        | 43.0%           | 40.2%                  | 43.5%         |
| Upper   | 0                         | 0.0%        | 0         | 0.0%        | 57.0%           | 55.2%                  | 54.0%         |
| Unknown   | 0                         | 0.0%        | 0         | 0.0%        | 0.0%            | 4.6%                   | 2.5%          |
| <b>TOTAL</b>  | <b>0</b>                  | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b>   | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Business Lending<br>By Income Level of Geography |                           |               |            |               |                    |                        |               |
|---|---------------------------|---------------|------------|---------------|--------------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Business Loans |               |            |               | % of<br>Businesses | Aggregate of Peer Data |               |
|   | #                         | %             | \$ (000s)  | \$ %          |                    | %                      | \$ %          |
| Low   | 0                         | 0.0%          | 0          | 0.0%          | 0.0%               | 0.0%                   | 0.0%          |
| Moderate  | 0                         | 0.0%          | 0          | 0.0%          | 0.0%               | 0.0%                   | 0.0%          |
| Middle  | 5                         | 41.7%         | 86         | 47.0%         | 43.3%              | 43.4%                  | 53.2%         |
| Upper   | 7                         | 58.3%         | 97         | 53.0%         | 56.7%              | 55.0%                  | 45.9%         |
| Unknown   | 0                         | 0.0%          | 0          | 0.0%          | 0.0%               | 1.6%                   | 1.0%          |
| <b>TOTAL</b>  | <b>12</b>                 | <b>100.0%</b> | <b>183</b> | <b>100.0%</b> | <b>100.0%</b>      | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2019 Small Farm Lending<br>By Income Level of Geography |                       |               |           |               |               |                        |               |
|---|-----------------------|---------------|-----------|---------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |               |           |               | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %             | \$ (000s) | \$ %          |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%          | 0         | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| Moderate  | 0                     | 0.0%          | 0         | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| Middle  | 0                     | 0.0%          | 0         | 0.0%          | 32.0%         | 48.2%                  | 73.5%         |
| Upper   | 1                     | 100.0%        | 98        | 100.0%        | 68.0%         | 51.8%                  | 26.5%         |
| Unknown   | 0                     | 0.0%          | 0         | 0.0%          | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>1</b>              | <b>100.0%</b> | <b>98</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

| Distribution of 2020 Small Farm Lending<br>By Income Level of Geography |                       |             |           |             |               |                        |               |
|---|-----------------------|-------------|-----------|-------------|---------------|------------------------|---------------|
| Census Tract<br>Income Level  | Bank Small Farm Loans |             |           |             | % of Farms    | Aggregate of Peer Data |               |
|   | #                     | %           | \$ (000s) | \$ %        |               | # %                    | \$ %          |
| Low   | 0                     | 0.0%        | 0         | 0.0%        | 0.0%          | 0.0%                   | 0.0%          |
| Moderate  | 0                     | 0.0%        | 0         | 0.0%        | 0.0%          | 0.0%                   | 0.0%          |
| Middle  | 0                     | 0.0%        | 0         | 0.0%        | 30.7%         | 50.0%                  | 55.4%         |
| Upper   | 0                     | 0.0%        | 0         | 0.0%        | 69.3%         | 50.0%                  | 44.6%         |
| Unknown   | 0                     | 0.0%        | 0         | 0.0%        | 0.0%          | 0.0%                   | 0.0%          |
| <b>TOTAL</b>  | <b>0</b>              | <b>0.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>          | <b>100.0%</b> |

## Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family Income<br>% | Aggregate HMDA Data |               |
|  | #          | %             | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 1          | 1.1%          | 40            | 0.1%          | 12.7%                             | 2.0%                | 0.8%          |
| Moderate   | 13         | 14.1%         | 3,114         | 10.1%         | 14.9%                             | 11.9%               | 7.7%          |
| Middle   | 20         | 21.7%         | 5,633         | 18.2%         | 20.9%                             | 18.9%               | 15.2%         |
| Upper  | 58         | 63.0%         | 22,127        | 71.6%         | 51.5%                             | 56.5%               | 64.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 10.6%               | 11.7%         |
| <b>TOTAL</b>   | <b>92</b>  | <b>100.0%</b> | <b>30,914</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 1          | 3.3%          | 140           | 1.3%          | 12.7%                             | 3.9%                | 2.1%          |
| Moderate   | 1          | 3.3%          | 200           | 1.8%          | 14.9%                             | 9.6%                | 6.1%          |
| Middle   | 4          | 13.3%         | 1,260         | 11.5%         | 20.9%                             | 19.2%               | 16.3%         |
| Upper  | 24         | 80.0%         | 9,358         | 85.4%         | 51.5%                             | 53.9%               | 61.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 13.4%               | 14.1%         |
| <b>TOTAL</b>   | <b>30</b>  | <b>100.0%</b> | <b>10,958</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 1.0%                | 1.1%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 5.8%                | 5.3%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 18.3%               | 13.3%         |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 51.5%                             | 67.3%               | 73.4%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 7.7%                | 6.8%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 51.5%                             | 8.3%                | 1.7%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 91.7%               | 98.3%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 8.2%                | 7.5%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 12.3%               | 10.9%         |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 12.3%               | 4.9%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 51.5%                             | 65.8%               | 75.7%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 1.4%                | 0.9%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 9.4%                | 1.3%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 9.4%                | 6.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 3.1%                | 1.7%          |
| Upper  | 1          | 100.0%        | 97            | 100.0%        | 51.5%                             | 65.6%               | 67.3%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 12.5%               | 23.7%         |
| <b>TOTAL</b>   | <b>1</b>   | <b>100.0%</b> | <b>97</b>     | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Purpose Not Applicable</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 0.0%                | 0.0%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 51.5%                             | 7.7%                | 12.2%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 92.3%               | 87.8%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Total Home Mortgage Loans |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 2          | 1.6%          | 180           | 0.4%          | 12.7%         | 3.0%          | 1.5%          |
| Moderate                  | 14         | 11.4%         | 3,314         | 7.9%          | 14.9%         | 10.5%         | 6.7%          |
| Middle                    | 24         | 19.5%         | 6,893         | 16.4%         | 20.9%         | 18.5%         | 14.8%         |
| Upper                     | 83         | 67.5%         | 31,582        | 75.3%         | 51.5%         | 55.7%         | 61.3%         |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 12.3%         | 15.7%         |
| <b>TOTAL</b>              | <b>123</b> | <b>100.0%</b> | <b>41,969</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2020 Home Mortgage Lending<br>By Borrower Income Level |            |               |               |               |                                   |                     |               |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract<br>Income Level   | Bank Loans |               |               |               | Families by<br>Family<br>Income % | Aggregate HMDA Data |               |
|  | #          | # %           | \$ (000s)     | \$ %          |                                   | # %                 | \$ %          |
| <b>Home Purchase Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 6          | 5.4%          | 888           | 2.3%          | 12.7%                             | 2.0%                | 0.9%          |
| Moderate   | 16         | 14.4%         | 4,033         | 10.3%         | 14.9%                             | 11.4%               | 7.5%          |
| Middle   | 23         | 20.7%         | 6,929         | 17.7%         | 20.9%                             | 19.3%               | 15.5%         |
| Upper  | 59         | 53.2%         | 24,436        | 62.3%         | 51.5%                             | 58.5%               | 66.4%         |
| Unknown  | 7          | 6.3%          | 2,913         | 7.4%          | 0.0%                              | 8.7%                | 9.6%          |
| <b>TOTAL</b>   | <b>111</b> | <b>100.0%</b> | <b>39,199</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Refinance</b>   |            |               |               |               |                                   |                     |               |
| Low  | 2          | 1.6%          | 291           | 0.7%          | 12.7%                             | 2.4%                | 1.4%          |
| Moderate   | 17         | 13.5%         | 4,139         | 9.6%          | 14.9%                             | 11.5%               | 8.5%          |
| Middle   | 29         | 23.0%         | 9,221         | 21.4%         | 20.9%                             | 22.4%               | 19.6%         |
| Upper  | 65         | 51.6%         | 25,450        | 59.0%         | 51.5%                             | 49.9%               | 56.1%         |
| Unknown  | 13         | 10.3%         | 3,999         | 9.3%          | 0.0%                              | 13.8%               | 14.5%         |
| <b>TOTAL</b>   | <b>126</b> | <b>100.0%</b> | <b>43,100</b> | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Home Improvement</b>  |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 3.8%                | 5.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 6.3%                | 5.6%          |
| Middle   | 2          | 50.0%         | 592           | 40.8%         | 20.9%                             | 25.0%               | 23.3%         |
| Upper  | 1          | 25.0%         | 350           | 24.1%         | 51.5%                             | 61.3%               | 58.9%         |
| Unknown  | 1          | 25.0%         | 510           | 35.1%         | 0.0%                              | 3.8%                | 6.6%          |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>1,452</b>  | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Multifamily Loans</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 0.0%                | 0.0%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 12.5%               | 3.4%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 51.5%                             | 12.5%               | 1.0%          |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 75.0%               | 95.6%         |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose LOC</b>   |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 5.7%                | 5.6%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 7.1%                | 4.8%          |
| Middle   | 0          | 0.0%          | 0             | 0.0%          | 20.9%                             | 14.3%               | 9.4%          |
| Upper  | 0          | 0.0%          | 0             | 0.0%          | 51.5%                             | 68.6%               | 76.0%         |
| Unknown  | 0          | 0.0%          | 0             | 0.0%          | 0.0%                              | 4.3%                | 4.2%          |
| <b>TOTAL</b>   | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |
| <b>Other Purpose Closed/Exempt</b>                                     |            |               |               |               |                                   |                     |               |
| Low  | 0          | 0.0%          | 0             | 0.0%          | 12.7%                             | 0.0%                | 0.0%          |
| Moderate   | 0          | 0.0%          | 0             | 0.0%          | 14.9%                             | 11.9%               | 6.7%          |
| Middle   | 1          | 25.0%         | 150           | 16.3%         | 20.9%                             | 16.7%               | 7.2%          |
| Upper  | 2          | 50.0%         | 550           | 59.8%         | 51.5%                             | 59.5%               | 72.8%         |
| Unknown  | 1          | 25.0%         | 220           | 23.9%         | 0.0%                              | 11.9%               | 13.3%         |
| <b>TOTAL</b>   | <b>4</b>   | <b>100.0%</b> | <b>920</b>    | <b>100.0%</b> | <b>100.0%</b>                     | <b>100.0%</b>       | <b>100.0%</b> |

## Appendix C (continued)

| Purpose Not Applicable    |            |               |               |               |               |               |               |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low                       | 0          | 0.0%          | 0             | 0.0%          | 12.7%         | 0.0%          | 0.0%          |
| Moderate                  | 0          | 0.0%          | 0             | 0.0%          | 14.9%         | 0.0%          | 0.0%          |
| Middle                    | 0          | 0.0%          | 0             | 0.0%          | 20.9%         | 0.0%          | 0.0%          |
| Upper                     | 0          | 0.0%          | 0             | 0.0%          | 51.5%         | 0.0%          | 0.0%          |
| Unknown                   | 0          | 0.0%          | 0             | 0.0%          | 0.0%          | 100.0%        | 100.0%        |
| <b>TOTAL</b>              | <b>0</b>   | <b>0.0%</b>   | <b>0</b>      | <b>0.0%</b>   | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Total Home Mortgage Loans |            |               |               |               |               |               |               |
| Low                       | 8          | 3.3%          | 1,179         | 1.4%          | 12.7%         | 2.3%          | 1.2%          |
| Moderate                  | 33         | 13.5%         | 8,172         | 9.7%          | 14.9%         | 11.1%         | 7.9%          |
| Middle                    | 55         | 22.4%         | 16,892        | 20.0%         | 20.9%         | 21.1%         | 17.7%         |
| Upper                     | 127        | 51.8%         | 50,786        | 60.0%         | 51.5%         | 52.6%         | 58.8%         |
| Unknown                   | 22         | 9.0%          | 7,642         | 9.0%          | 0.0%          | 12.8%         | 14.3%         |
| <b>TOTAL</b>              | <b>245</b> | <b>100.0%</b> | <b>84,671</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |

| Distribution of 2019 Small Business Lending<br>By Borrower Income Level |                              |          |             |               |              |             |               |                  |
|---|------------------------------|----------|-------------|---------------|--------------|-------------|---------------|------------------|
| Business Revenue and Loan Size  |                              | Count    |             |               | Dollars      |             |               | Total Businesses |
|   |                              | Bank     |             | Aggregate     | Bank         |             | Aggregate     | %                |
|   |                              | #        | %           | %             | \$<br>(000s) | \$ %        | \$ %          |                  |
| Business Revenue  | \$1 Million or Less          | 0        | 0.0%        | 55.0%         | 0            | 0.0%        | 45.7%         | 93.6%            |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 45.0%         | 0            | 0.0%        | 54.3%         | 6.4%             |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>     | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b>    |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 92.4%         | 0            | 0.0%        | 40.3%         |                  |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 4.5%          | 0            | 0.0%        | 19.0%         |                  |
|   | \$250,001–\$1 Million        | 0        | 0.0%        | 3.0%          | 0            | 0.0%        | 40.6%         |                  |
|   | Over \$1 Million             | 0        | 0.0%        | 0.0%          | 0            | 0.0%        | 0.0%          |                  |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>     | <b>0.0%</b> | <b>100.0%</b> |                  |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 0        | 0.0%        |               | 0            | 0.0%        |               |                  |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0            | 0.0%        |               |                  |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0            | 0.0%        |               |                  |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0            | 0.0%        |               |                  |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>     | <b>0.0%</b> |               |                  |

| Distribution of 2020 Small Business Lending<br>By Borrower Income Level |                              |           |               |               |            |               |               |                          |
|---|------------------------------|-----------|---------------|---------------|------------|---------------|---------------|--------------------------|
| Business Revenue and Loan Size  |                              | Count     |               |               | Dollars    |               |               | Total<br>Businesses<br>% |
|   |                              | Bank      |               | Aggregate     | Bank       |               | Aggregate     |                          |
|   |                              | #         | %             | %             | \$ (000s)  | \$ %          | \$ %          |                          |
| Business<br>Revenue   | \$1 Million or Less          | 0         | 0.0%          | 40.9%         | 0          | 0.0%          | 30.8%         | 93.8%                    |
|   | Over \$1 Million/<br>Unknown | 12        | 100.0%        | 59.1%         | 183        | 100.0%        | 69.2%         | 6.2%                     |
|   | <b>TOTAL</b>                 | <b>12</b> | <b>100.0%</b> | <b>100.0%</b> | <b>183</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b>            |
| Loan Size   | \$100,000 or Less            | 12        | 100.0%        | 86.9%         | 183        | 100.0%        | 35.7%         |                          |
|   | \$100,001–\$250,000          | 0         | 0.0%          | 8.5%          | 0          | 0.0%          | 23.9%         |                          |
|   | \$250,001–\$1 Million        | 0         | 0.0%          | 4.7%          | 0          | 0.0%          | 40.4%         |                          |
|   | Over \$1 Million             | 0         | 0.0%          | 0.0%          | 0          | 0.0%          | 0.0%          |                          |
|   | <b>TOTAL</b>                 | <b>12</b> | <b>100.0%</b> | <b>100.0%</b> | <b>183</b> | <b>100.0%</b> | <b>100.0%</b> |                          |
| Loan Size<br>Revenue \$1 Million<br>or Less                             | \$100,000 or Less            | 0         | 0.0%          |               | 0          | 0.0%          |               |                          |
|   | \$100,001–\$250,000          | 0         | 0.0%          |               | 0          | 0.0%          |               |                          |
|   | \$250,001–\$1 Million        | 0         | 0.0%          |               | 0          | 0.0%          |               |                          |
|   | Over \$1 Million             | 0         | 0.0%          |               | 0          | 0.0%          |               |                          |
|   | <b>TOTAL</b>                 | <b>0</b>  | <b>0.0%</b>   |               | <b>0</b>   | <b>0.0%</b>   |               |                          |

| Distribution of 2019 Small Farm Lending<br>By Borrower Income Level |                              |          |               |               |           |               |               |               |
|---|------------------------------|----------|---------------|---------------|-----------|---------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |               |               | Dollars   |               |               | Farms<br>%    |
|   |                              | Bank     |               | Aggregate     | Bank      |               | Aggregate     |               |
|   |                              | #        | %             | %             | \$ (000s) | \$ %          | \$ %          |               |
| Farm<br>Revenue   | \$1 Million or Less          | 1        | 100.0%        | 64.3%         | 98        | 100.0%        | 88.9%         | 98.7%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%          | 35.7%         | 0         | 0.0%          | 11.1%         | 1.3%          |
|   | <b>TOTAL</b>                 | <b>1</b> | <b>100.0%</b> | <b>100.0%</b> | <b>98</b> | <b>100.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%          | 92.9%         | 0         | 0.0%          | 59.4%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%          | 5.4%          | 0         | 0.0%          | 22.3%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%          | 1.8%          | 0         | 0.0%          | 18.2%         |               |
|   | Over \$500,000               | 1        | 100.0%        | 0.0%          | 98        | 100.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>1</b> | <b>100.0%</b> | <b>100.0%</b> | <b>98</b> | <b>100.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%          |               | 0         | 0.0%          |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%          |               | 0         | 0.0%          |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%          |               | 0         | 0.0%          |               |               |
|   | Over \$1 Million             | 1        | 100.0%        |               | 98        | 100.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>1</b> | <b>100.0%</b> |               | <b>98</b> | <b>100.0%</b> |               |               |

| Distribution of 2020 Small Farm Lending<br>By Borrower Income Level |                              |          |             |               |           |             |               |               |
|---|------------------------------|----------|-------------|---------------|-----------|-------------|---------------|---------------|
| Farm Revenue and Loan Size  |                              | Count    |             |               | Dollars   |             |               | Farms<br>%    |
|   |                              | Bank     |             | Aggregate     | Bank      |             | Aggregate     |               |
|   |                              | #        | %           | %             | \$ (000s) | \$ %        | \$ %          |               |
| Farm Revenue  | \$1 Million or Less          | 0        | 0.0%        | 63.3%         | 0         | 0.0%        | 35.7%         | 99.3%         |
|   | Over \$1 Million/<br>Unknown | 0        | 0.0%        | 36.7%         | 0         | 0.0%        | 64.3%         | 0.7%          |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> | <b>100.0%</b> |
| Loan Size   | \$100,000 or Less            | 0        | 0.0%        | 86.7%         | 0         | 0.0%        | 40.0%         |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        | 6.7%          | 0         | 0.0%        | 25.3%         |               |
|   | \$250,001–\$500,000          | 0        | 0.0%        | 6.7%          | 0         | 0.0%        | 34.7%         |               |
|   | Over \$500,000               | 0        | 0.0%        | 0.0%          | 0         | 0.0%        | 0.0%          |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> | <b>100.0%</b> | <b>0</b>  | <b>0.0%</b> | <b>100.0%</b> |               |
| Loan Size<br>Revenue \$1 Million<br>or Less                         | \$100,000 or Less            | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$100,001–\$250,000          | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | \$250,001–\$1 Million        | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | Over \$1 Million             | 0        | 0.0%        |               | 0         | 0.0%        |               |               |
|   | <b>TOTAL</b>                 | <b>0</b> | <b>0.0%</b> |               | <b>0</b>  | <b>0.0%</b> |               |               |

## GLOSSARY

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Assessment area:** One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

**Census tract:** A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely, depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community contact:** Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

**Community development:** An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals (LMI); (2) community services targeted to LMI individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate- and middle-income individuals and geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Demographics:** The statistical characteristics of human populations (e.g., age, race, sex, and income, etc.) used especially to identify markets.

**Appendix D (continued)**

**Distressed nonmetropolitan middle-income geography:** A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

**Full-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders who do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

**Household:** One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

**Housing affordability ratio:** Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

**Limited-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).



**Appendix D (continued)**

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Median family income:** The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan statistical area (nonMSA):** Not part of a metropolitan area. (See metropolitan area.)

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-occupied units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Performance context:** The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

**Appendix D (continued)**

**Performance criteria:** These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

**Performance evaluation (PE):** A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Small businesses/small farms:** A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

**Small loan(s) to business(es):** That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved middle-income geography:** A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**Upper-income:** Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of a geography.