



PUBLIC DISCLOSURE

April 20, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank in Carlyle
Charter Number 14268

891 Fairfax Street
Carlyle, IL 62231

Office of the Comptroller of the Currency
500 N. Broadway St. Suite 1700
St. Louis, MO 63102

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, and should not be construed as, an assessment of the financial condition of this 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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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The Lending Test is rated: Outstanding.

The Lending Test rating is based on First National Bank in Carlyle's (FNB or bank) performance in the state of Illinois. The major factors that support this rating include:

- FNB's average quarterly loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of FNB's loans are originated or purchased inside its assessment area (AA).
- FNB's distribution of loans across geographies of different income levels is excellent throughout the AA.
- FNB's distribution of loans to individuals of different income levels and businesses of different sizes is excellent throughout the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

FNB's average LTD ratio over the 17 quarters since the last CRA evaluation was 70 percent. Over this period, the bank's LTD ratio ranged from a low of 59.3 percent to a high of 79 percent.

We analyzed the LTD ratio of four similarly situated institutions based on a combination of size, location, and lending opportunities. The institutions ranged in size from \$84.5 million to \$394.2 million, with a combined average LTD ratio of 78.8 percent over the same evaluation period. The lowest individual average was 51.9 percent, while the highest individual average was 109.7 percent. FNB ranked third amongst the group when comparing the average LTD ratios. The table below lists the similarly situated institutions (including FNB) with corresponding average LTD ratios.

| Institution | Average Quarterly LTD Ratio | Total Assets (\$000s) as of 12/31/2019 |
|---|-----------------------------|--|
| Tempo Bank, FSB | 109.7% | \$99,042 |
| Community Bank of Trenton | 85.5% | \$84,495 |
| The First National Bank in Carlyle | 70.0% | \$202,031 |
| Germantown Trust & Savings Bank | 68.3% | \$394,171 |
| Farmers State Bank of Hoffman | 51.9% | \$151,039 |

*Source: Quarterly Call Reports from December 31, 2015 to December 31, 2019.
Note: The LTD ratio was calculated and evaluated on a bank-wide basis.*

Lending in Assessment Area

A majority of FNB's loans are originated or purchased inside its AA.

Based on a sample of 20 originations or purchases (per primary product), selected at random from the evaluation period January 1, 2017 through December 31, 2019, the bank originated or purchased 70 percent of its loans inside the bank's AA. This analysis is performed at the bank, rather than the AA, level.

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|-----------------|-------------|-----------|-------------|------------|---------------------------------|-------------|--------------|-------------|-------------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Small Business | | | | | | | | | | |
| 2017 | 6 | 66.7 | 3 | 33.3 | 9 | 919 | 39.1 | 1,430 | 60.9 | 2,349 |
| 2018 | 3 | 50.0 | 3 | 50.0 | 6 | 73 | 18.4 | 323 | 81.6 | 396 |
| 2019 | 4 | 80.0 | 1 | 20.0 | 5 | 1,565 | 43.9 | 2,000 | 56.1 | 3,565 |
| Subtotal | 13 | 65.0 | 7 | 35.0 | 20 | 2,557 | 40.5 | 3,753 | 59.5 | 6,310 |
| Consumer | | | | | | | | | | |
| 2017 | 6 | 66.7 | 3 | 33.3 | 9 | 72 | 49.0 | 75 | 51.0 | 147 |
| 2018 | 6 | 100.0 | 0 | 0.0 | 6 | 23 | 100.0 | 0 | 0.0 | 23 |
| 2019 | 3 | 60.0 | 2 | 40.0 | 5 | 9 | 47.4 | 10 | 52.6 | 19 |
| Subtotal | 15 | 75.0 | 5 | 25.0 | 20 | 104 | 55.0 | 85 | 45.0 | 189 |
| Total | 28 | 70.0 | 12 | 30.0 | 40 | 2,661 | 40.9 | 3,838 | 59.1 | 6,499 |
| <i>Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | |

Description of Institution

FNB is an intrastate bank headquartered in Carlyle, Illinois (Carlyle), and wholly owned by First National Bancorporation in Carlyle, Inc. (FNBC), a one-bank holding company also located in Carlyle. As of December 31, 2019, FNBC had total assets of approximately \$22.4 million. There were no affiliate or subsidiary activities considered in this evaluation.

The bank competes with many national banks, state banks, and credit unions for deposit and lending market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products consist of checking, savings, and money market accounts, certificates of deposit, individual retirement accounts, and health savings accounts. The bank offers additional retail services including internet and mobile banking, remote deposit capture, safe deposit box rentals, telephone banking, trust services, and wire transfers.

Agricultural loans and leases include farm real estate loans, livestock loans, machinery loans, and revolving lines of credit. Business loans include commercial real estate loans, equipment loans,

inventory loans, and operating loans. Consumer loans include conventional home mortgage loans, home equity lines of credit, motor vehicle loans and other personal loans.

Additionally, the bank offers flexible loan products such as Federal Housing Administration loans, Small Business Administration loans, and United States Department of Agriculture Farm Assistance loans and Rural Development loans.

There have been no major changes in FNB's corporate structure, including merger or acquisition activities during the evaluation period. As of December 31, 2019, the bank had total assets of \$202 million, total deposits of \$162.3 million, and Tier 1 Capital of \$22.4 million or 17.3 percent of total risk-weighted assets. FNB's loans and leases totaled \$121.8 million, representing 60.3 percent of total assets. Loan portfolio composition as of December 31, 2019, includes the following:

| Loan Type | Dollars (000) | Percentage of Loan Portfolio |
|--|----------------------|-------------------------------------|
| Commercial Loans | \$48,232 | 39.6% |
| Agriculture Loans | \$48,031 | 39.4% |
| Residential Loans | \$18,552 | 15.2% |
| Consumer Loans | \$3,687 | 3.1% |
| Other Loans | \$3,297 | 2.7% |
| Total Loans | \$121,799 | 100% |
| <i>Source: 12/31/2019 FFIEC Call Report Due to rounding, totals may not equal 100.0%</i> | | |

There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs of its AA. The bank's last CRA performance evaluation was on November 23, 2015. Utilizing Small Bank CRA examination procedures, the OCC concluded that FNB's performance was "Satisfactory."

For CRA purposes, FNB has identified a single AA that includes all of Clinton County, Illinois which is in the St. Louis Metropolitan Statistical Area (MSA) # 41180. Clinton County is divided into eight census tracts (CT), consisting of one moderate-income CT, four middle-income CTs and three upper-income CTs. The AA conforms to regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies. We will refer to this AA throughout the performance evaluation as the St. Louis MSA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of FNB under the Small Bank performance criteria, which consists of the Lending Test. This test evaluates the bank's record of meeting the credit needs of its AA through its lending activities.

The evaluation period for this examination is from November 24, 2015 through December 31, 2019. For the Lending Test, we determined that loan data from January 1, 2017 through December 31, 2019 was representative of the evaluation period.

Based on discussions with bank management and our review of all loan originations and purchases from January 1, 2017 to December 31, 2019, we determined the bank’s primary lending products are business loans and consumer loans. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

| St. Louis MSA Loan Originations/Purchases by Loan Type from January 1, 2017 through December 31, 2019 | | | | |
|--|------------------------|-----------------------------|-----------------------|---------------------|
| Loan Category | Number of Loans | % of Number of Loans | Dollars (000s) | % of Dollars |
| Consumer Loans | 630 | 52.9% | \$9,889 | 7.7% |
| Business Loans | 238 | 20.0% | \$72,026 | 56.1% |
| Farm Loans | 172 | 14.4% | \$29,671 | 23.1% |
| Home Mortgage Loans | 151 | 12.7% | \$16,855 | 13.1% |
| Total Loans | 1,191 | 100% | \$128,441 | 100% |
| <i>Source: Bank Records January 1, 2017 – December 31, 2019 Due to rounding, totals may not equal 100.0%</i> | | | | |

To evaluate lending performance, we selected a random sample of 20 business loans and 20 consumer loans originated or purchased between January 1, 2017 and December 31, 2019. For our analysis of the bank’s lending performance over the evaluation period of 2017-2019, we used the comparators of demographic data from the 2015 American Community Survey (ACS) U.S. Census and 2018 CRA peer aggregate data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank’s performance under the CRA Small Bank Lending Test as well as related performance context information from the bank’s AA. Except for the bank’s LTD ratio (based on the bank’s entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank’s lending performance in relation to its primary products of business loans and consumer loans in its AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Illinois

CRA rating for the State of Illinois: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- A majority of FNB's loans are originated or purchased inside its AA.
- FNB's distribution of loans across geographies of different income levels is excellent throughout the AA.
- FNB's distribution of loans to individuals of different income levels and businesses of different sizes is excellent throughout the AA.

Description of Institution's Operations in Illinois

FNB's operations in the state of Illinois are located within its St. Louis MSA. Prior to the current evaluation, the bank operated a main office and full-service branch in Carlyle, and one full-service branch in Aviston. In a June 2016 acquisition from Centru Bank, the bank added a full-service branch in St. Rose and an additional full-service branch in Aviston. In December 2017, the bank consolidated its two Aviston branches into one newly remodeled full-service branch. The main office and each of the branch locations have a cash-dispensing automated teller machine onsite.

St. Louis MSA

As of June 30, 2019, FNB reported \$153 million in deposits in the St. Louis MSA, representing 100 percent of the bank's total deposits. According to FDIC market share information as of June 30, 2019, FNB ranked third in deposit market share in the AA with a market share of 14.8 percent. The AA is competitive with 10 other FDIC insured deposit-taking institutions operating 17 branches. Rounding out the top five in deposit market share are Germantown Trust & Savings Bank (29.5 percent), FCB Banks (17.8 percent), Farmers State Bank of Hoffman (7.4 percent), and Tempo Bank, FSA (7.2 percent).

Geographic Distribution of the Population

According to the 2015 ACS Census data, the area population was 37,929 with 1,289 (3.4 percent) residing in the moderate-income CT, 25,868 (68.2 percent) residing in middle-income CTs, and 10,772 (28.4 percent) residing in upper-income CTs.

Household Distribution by Income Level

According to the 2015 ACS Census data, there were 13,866 households in the AA. The distribution of households by income level was 2,718 (19.6 percent) low-income, 2,121 (15.3 percent) moderate-income, 2,288 (16.5 percent) middle-income, and 6,753 (48.6 percent) upper-income.

| Demographic Information of the Assessment Area | | | | | | |
|--|--------|---------------|----------------------|------------------|-----------------|---------------|
| Assessment Area: St. Louis MSA | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 8 | 0.0 | 12.5 | 50.0 | 37.5 | 0.0 |
| Population by Geography | 37,929 | 0.0 | 3.4 | 68.2 | 28.4 | 0.0 |
| Housing Units by Geography | 15,504 | 0.0 | 4.2 | 68.5 | 27.3 | 0.0 |
| Owner-Occupied Units by Geography | 11,517 | 0.0 | 4.7 | 66.8 | 28.5 | 0.0 |
| Occupied Rental Units by Geography | 2,349 | 0.0 | 2.0 | 69.3 | 28.7 | 0.0 |
| Vacant Units by Geography | 1,638 | 0.0 | 4.0 | 79.1 | 16.9 | 0.0 |
| Businesses by Geography | 1,962 | 0.0 | 2.9 | 70.1 | 27.1 | 0.0 |
| Farms by Geography | 265 | 0.0 | 6.0 | 56.2 | 37.7 | 0.0 |
| Family Distribution by Income Level | 9,542 | 14.4 | 15.7 | 23.6 | 46.3 | 0.0 |
| Household Distribution by Income Level | 13,866 | 19.6 | 15.3 | 16.5 | 48.7 | 0.0 |
| Median Family Income - 41180 St. Louis, MO-IL MMSA | | \$70,718 | Median Housing Value | | | \$133,237 |
| Households Below Poverty Level | | 9.3% | Median Gross Rent | | | \$778 |

Source: 2015 ACS and 2019 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Employment Factors and Economic Conditions

According to the U.S. Bureau of Labor Statistics data, the annual employment rate across the AA ranged from a high of 3.6 percent in 2017 to a low of 3.1 percent in 2019. The annual unemployment rate for the state of Illinois ranged from a high of 4.9 percent in 2017 to a low of four percent in 2019, lagging the national unemployment rate over the same period.

| Annual Unemployment Rates | | | |
|---------------------------|------|------|------|
| Area | 2017 | 2018 | 2019 |
| Clinton County | 3.6% | 3.5% | 3.1% |
| State of Illinois | 4.9% | 4.3% | 4.0% |
| National | 4.4% | 3.9% | 3.7% |

Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.

Based on the 2015 ACS Census data and June 2019 Dun & Bradstreet data, there were 1,962 businesses located in the St. Louis MSA. Small businesses with gross annual revenues of one million dollars or less make up approximately 78 percent (1,532) of businesses in the AA. Out of the 1,532 small businesses, 47 (3.1 percent) are in the moderate-income CT, 1,047 (68.3 percent) are in middle-income CTs, and 438 (28.6 percent) are in upper-income CTs.

Moody's Analytics states the following about the St. Louis MSA: *St. Louis will remain a below-average performer in 2020 with risks to the manufacturing outlook weighted to the downside. New investment will pave the way for modest gains in construction and the public sector in the medium term, but an unfavorable demographic profile and slow population growth will keep STL from expanding at the national pace in terms of jobs and output in the long run.*

The top five employment sectors in the AA are Education and Health Services, Professional and Business Services, Leisure and Hospitality Services, Government, and Retail Trade. The top five employers in the AA include BJC Healthcare (24,182 employees), Walmart Inc. (22,006 employees), SSM Health Care System (15,949 employees) Washington University in St. Louis (14,692 employees), and Boeing Defense, Space & Security (14,617 employees).

Community Contacts

We reviewed a recent contact from within the same period of this evaluation. In May 2019, the OCC contacted a community action agency that serves several counties in Illinois, including Clinton County. The contact identified affordable housing (including first time homebuyer programs and down payment and closing assistance), financial education, and literacy programming in order to address the needs of the unbanked population, and small business development and lending.

Scope of Evaluation in Illinois

We performed a full-scope review of the St. Louis MSA. Refer to Appendix A for more information.

LENDING TEST

FNB's performance under the Lending Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, FNB's performance in the St. Louis MSA is excellent.

Distribution of Loans by Income Level of the Geography

FNB exhibits an excellent geographic distribution of loans in the AA. Our analysis is based solely on the bank's performance in moderate-income CTs, as there are no low-income CTs in the St. Louis MSA.

Small Loans to Businesses

Refer to Table Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

FNB exhibits an excellent geographic distribution of small loans to businesses within the St. Louis MSA. The bank's percentage of loans originated or purchased in moderate-income CTs (5 percent) exceeded both the percentage of businesses located in moderate-income CTs (2.9 percent) and the aggregate percentage of loans originated or purchased in those geographies (1.4 percent).

Consumer Loans

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

FNB exhibits an excellent geographic distribution of consumer loans within the St. Louis MSA. The bank's percentage of loans originated or purchased in moderate-income CTs (10 percent) exceeded the percentage of households in moderate-income CTs (4.2 percent).

Lending Gap Analysis

The OCC analyzed FNB's geographic lending patterns of small loans to businesses and consumer loans by mapping loan originations and purchases throughout the AA. We did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

FNB exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

FNB exhibits an excellent distribution of loans to businesses of different sizes in the St. Louis MSA. The bank's percentage of loans to small businesses (85 percent) exceeded both the percentage of small businesses in the AA (78.1 percent) and the aggregate percentage loans to small businesses (48.2 percent).

Consumer Loans

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

FNB exhibits an excellent distribution of loans to individuals of different income levels in the St. Louis MSA. The bank's percentage of loans to low-income borrowers (45 percent) exceeded the percentage of low-income households (19.5 percent) in the AA. The bank's percentage of loans to moderate-income borrowers (30 percent) exceeded the percentage of moderate-income households (15.3 percent) in the AA.

Responses to Complaints

The bank did not receive any complaints related to CRA performance within the state of Illinois.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

| | | |
|---|---|---|
| Time Period Reviewed: | 01/01/2017 to 12/31/2019 | |
| Bank Products Reviewed: | Small Business Loans and Consumer Loans | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| Not Applicable | Not Applicable | Not Applicable |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| State of Illinois | | |
| St. Louis MO-IL MSA #41180 | Full-Scope | Clinton County: CTs 9001 – 9003, 9004.01, 9004.02, 9005, 9006.01, 9006.02 |

Appendix B: Summary of MMSA and State Ratings

| RATINGS: THE FIRST NATIONAL BANK IN CARLYLE | |
|--|-----------------------------|
| Overall Bank: | Lending Test Rating: |
| The First National Bank in Carlyle | Outstanding |
| State: | |
| Illinois | Outstanding |

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

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 non-relatives 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 that conduct 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 the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

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.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report 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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| St. Louis MSA | 20 | 2,756 | 100.0 | 508 | 0.0 | 0.0 | 0.0 | 2.9 | 5.0 | 1.4 | 70.1 | 70.0 | 68.9 | 27.1 | 25.0 | 29.7 | 0.0 | 0.0 | 0.0 |
| Total | 20 | 2,756 | 100.0 | 508 | 0.0 | 0.0 | 0.0 | 2.9 | 5.0 | 1.4 | 70.1 | 70.0 | 68.9 | 27.1 | 25.0 | 29.7 | 0.0 | 0.0 | 0.0 |

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|------------------|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| St. Louis MSA | 20 | 2,756 | 100.0 | 508 | 78.1 | 85.0 | 48.2 | 6.8 | 15.0 | 15.1 | 0.0 |
| Total | 20 | 2,756 | 100.0 | 508 | 78.1 | 85.0 | 48.2 | 6.8 | 15.0 | 15.1 | 0.0 |

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2017-19 | |
|--|----------------------|-----|------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| St. Louis MSA | 20 | 191 | 200.0 | 0.0 | 0.0 | 4.2 | 10.0 | 67.2 | 40.0 | 28.5 | 50.0 | 0.0 | 0.0 | |
| <i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | | | | |

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2017-19 | |
|--|----------------------|------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| St. Louis MSA | 20 | 191 | 200.0 | 19.5 | 45.0 | 15.3 | 30.0 | 16.5 | 10.0 | 48.6 | 15.0 | 0.0 | 0.0 | |
| Total | 20 | 191 | 200.0 | 19.5 | 45.0 | 15.3 | 30.0 | 16.5 | 10.0 | 48.6 | 15.0 | 0.0 | 0.0 | |
| <i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | | | | | |