



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

July 07, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Oak View National Bank
Charter Number: 24849

340 Waterloo Street
Warrenton, VA 20186

Office of the Comptroller of the Currency

400 7th Street S.W.
Washington, DC 20219

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 **Satisfactory**.

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating for Oak View National Bank (OVNB or bank) is based on lending performance in the full-scope assessment area (AA) in the state of Virginia.
- The bank's loan-to-deposit (LTD) ratio was reasonable given the bank's size, financial condition, and credit needs in the AA.
- A majority of the bank's loans were originated inside the bank's AA.
- The bank exhibits reasonable geographic distribution of loans in the bank's AA.
- The bank exhibits reasonable borrower distribution of loans to individuals of different income levels and businesses of different sizes in the AA.
- The Community Development (CD) Test rating is based on CD activities in the full-scope AA in the state of Virginia.
- The bank exhibits adequate responsiveness to CD needs in the state of Virginia through CD loans, qualified investments, grants and donations, and CD services.

Loan-to-Deposit Ratio

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

OVNB's LTD ratio is calculated on a bank wide basis for the quarters March 31, 2022, through December 31, 2024. The bank's average quarterly LTD ratio for the 12 consecutive quarters in the evaluation period is 63.37 percent. This is below the average quarterly LTD ratio of 74.69 percent for institutions in the AA. The bank's average quarterly LTD ratios ranged from high of 74.13 percent to a low of 53.90 percent. The average quarterly LTD ratio of institutions in the bank's AA ranged from a high of 94.98 percent to a low of 26.02 percent.

Lending in Assessment Area

A majority of the bank's loans were inside its AA.

The bank originated and purchased 79.45 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area

2022 - 2024

| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$ (000s) | | |
|----------------|-----------------|--------------|-----------|--------------|------------|---------------------------------|--------------|---------------|--------------|-----------------|--|--|
| | Inside | | Outside | | | Inside | | Outside | | | | |
| | # | % | # | % | | \$ | % | \$ | % | | | |
| Home Mortgage | 104 | 78.79 | 28 | 21.21 | 132 | 36,644 | 72.49 | 13,908 | 27.51 | 50,552 | | |
| Small Business | 70 | 80.46 | 17 | 19.54 | 87 | 22,721 | 85.84 | 3,747 | 14.16 | 26,468 | | |
| Total | 174 | 79.45 | 45 | 20.55 | 219 | 59,365 | 77.08 | 17,655 | 22.92 | 77,020 | | |

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

Description of Institution

OVNB is a federally chartered bank headquartered in Warrenton, Virginia, which is owned and operated by Oak View Bankshares, Inc., headquartered in Marshall, Virginia. The bank is a single-state institution and does not have any affiliates or subsidiaries. As of December 31, 2024, OVNB reported total assets of \$694.4 million, and tier 1 capital of \$54.4 million.

OVNB has one rating area, which is the state of Virginia. OVNB has one AA, which is located within the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area (MSA). The AA includes all census tracts (CT) in Fauquier County, Culpeper County, and Rappahannock County, as well as two CTs 6108.00 and 6109.00 within Loudoun County, Virginia. Based on 2024 FFIEC census demographic data, the AA consisted of 34 CTs, of which 13 were moderate-income CTs, 18 were middle-income CTs, 3 were upper-income CTs. There were no low-income CTs in the AA during the evaluation period.

As of December 31, 2024, OVNB operated four full-service branches located in Fauquier, Culpeper, and Rappahannock Counties. Two branches are in moderate-income CTs, the newest branch, in Rappahannock County, opened in August of 2024, and the branch in Culpeper County. Both Fauquier County branches are located in middle-income CTs. The bank does not own and operate automated teller machines (ATMs) but does offer ATM services through the PULSE network and MoneyPass. Three branches are open from 8:30 am to 4:00 pm Monday through Thursday, 8:30 am to 6:00 pm on Friday, 9:00 am to 12:00 pm on Saturday, and closed on Sunday. The Flint Hill branch is closed on Saturday and Sunday; however, all other hours are the same as other branches. There were no merger or acquisitions over the review period.

As of December 31, 2024, the bank's loan portfolio totaled \$320 million, with total loans representing 46.15 percent of total assets. As of the same date, home mortgage loans (including multifamily loans) represented the largest percentage of total loans at 49.12 percent followed by commercial and commercial real estate (business) loans at 47.77 percent, and loans to individuals at 1.4 percent.

OVNB offers a full range of financial services for consumers, businesses, and non-profit entities. Non-profit banking products include checking accounts, savings accounts, treasury management services, money market accounts, lending products, and credit cards. Non-profit specific lending products include church loans as well as the municipal leasing program. OVNB offers a "business switch kit", a business checking account, specifically targeted toward small businesses in Virginia. A full listing and description of all products and services is available at the bank's website, www.oakviewbank.com.

OVNB has a partnership agreement with seven mortgage lenders in its Affordable Housing Program to provide direct assistance to low to moderate income homebuyers in the Mid-Atlantic region through a Federal Home Loan Bank (FHLB) of Atlanta program. The FHLB of Atlanta's First-time Homebuyers

product provides up to \$17,500 for down-payment, closing-cost, and principal reduction assistance for the purchase of or purchase/rehabilitation of a home by a first-time homebuyer and \$20,000 for a community partner. Homebuyers must meet product eligibility requirements and apply for funding through this program.

There were no financial or legal impediments to impact OVNB's ability to help meet the credit needs of the communities it services. The bank received an "Outstanding" rating under the "Small Bank" rating criteria at the previous CRA evaluation, dated March 3, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the CRA performance of OVNB using "Small Bank" performance standards for the 2022-2023 analysis period, and "Intermediate-Small Bank" (ISB) performance standards for the 2024 analysis period. Small bank performance is evaluated using only the Lending Test. ISB performance is evaluated using the Lending Test and CD Test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its primary lending products in home mortgage, and small loans to businesses. The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and services. The evaluation period is January 1, 2022, through December 31, 2024.

Small farm loans and multi-family loans were not considered in the lending test due to the low percentage of loan originations in the AA.

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 AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable 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 on its performance in the state of Virginia.

The state ratings in rating areas with a single AA are based on performance in that AA. Refer to the "Scope" section under the Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

State Rating

State of Virginia

CRA rating for the State of Virginia: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable geographic distribution of loans in the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Description of Institution's Operations in Virginia

OVNB provides products and services through its four full-service branches within the state of Virginia. The AA is contiguous, meets the requirements of the CRA regulation, and does not arbitrarily exclude low- or moderate-income CTs. The composition of the AA is fully detailed in the Description of Institution section of this evaluation and in appendix A of this evaluation.

OVNB originated a total of 1,340 loans during the evaluation period, with 48.43 percent commercial loans, 35.00 percent consumer loans, 16.12 percent home mortgage loans, and 0.45 percent farm loans. The bank primary loan products were determined to be loans to small businesses and home mortgage loans, which was reflective of the bank's business strategy during the evaluation period.

The AA is a competitive market for financial services. According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 25 financial institutions within the bank's AA operating 99 full-service branches with total deposits of \$12.7 billion. OVNB ranked seventh with a 4.16 percent market share. The five most prominent banks in this AA, Truist Bank, Wells Fargo Bank, National Association, Bank of America, National Association, Capitol One, National Association, and Atlantic Union Bank, represented 66.57 percent of the total market share in the AA.

According to 2023 Peer Mortgage data, the top 100 lenders originated 3,340 home mortgage loans in the AA. The top five home mortgage lenders in the AA were Pennymac Loan Services LLC, Truist Bank, Navy Federal Credit Union, Rocket Mortgage, and Atlantic Coast Mortgage, LLC, which held a combined loan market share of 26.64 percent in the AA.

Washington-Arlington-Alexandria, DC- VA-MD-WV Metropolitan Statistical Area (Washington AA)

| Assessment Area - Washington-Arlington-Alexandria, DC-VA-MD-WV MSA | | | | | | |
|--|-----------|------------|-----------------|-------------------------------------|--------------|------------|
| 2022 - 2024 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 34 | 0.00 | 44.12 | 52.94 | 2.94 | 0.00 |
| Population by Geography | 141,933 | 0.00 | 48.17 | 47.14 | 4.69 | 0.00 |
| Housing Units by Geography | 53,589 | 0.00 | 47.35 | 48.16 | 4.49 | 0.00 |
| Owner-Occupied Housing by Geography | 36,427 | 0.00 | 45.07 | 49.81 | 5.12 | 0.00 |
| Occupied Rental Units by Geography | 11,742 | 0.00 | 50.33 | 46.57 | 3.10 | 0.00 |
| Vacant Units by Geography | 5,420 | 0.00 | 56.20 | 40.54 | 3.27 | 0.00 |
| Businesses by Geography | 8,058 | 0.00 | 40.08 | 53.83 | 6.08 | 0.00 |
| Farms by Geography | 1,050 | 0.00 | 46.48 | 42.76 | 10.76 | 0.00 |
| Family Distribution by Income Level | 35,529 | 26.11 | 23.26 | 21.71 | 28.93 | 0.00 |
| Household Distribution by Income Level | 48,169 | 28.47 | 20.70 | 20.11 | 30.72 | 0.00 |
| Unemployment rate (%) | 3.48 | 0.00 | 3.79 | 3.05 | 4.87 | 0.00 |
| Households Below Poverty Level (%) | 6.33 | 0.00 | 7.85 | 5.23 | 2.78 | 0.00 |
| Median Family Income (11694 - Arlington-Alexandria-Reston, VA-WV MD) | \$135,790 | | | Median Housing Value | \$378,300 | |
| Median Family Income (11694 - Arlington-Alexandria-Reston, VA-WV MD) for 2024 | \$164,200 | | | Median Gross Rent | \$1,251 | |
| | | | | Families Below Poverty Level | 3.98 | |
| FFIEC File - 2020 Census | | | | | | |
| FFIEC File - 2024 Census | | | | | | |
| 2024 Dun & Bradstreet SBSF Demographics | | | | | | |
| Due to rounding, totals may not equal 100.0% | | | | | | |
| (*) The NA category consists of geographies that have not been assigned an income classification | | | | | | |

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rates in the Washington AA averaged 2.3, 2.4 and 2.5 percent for 2022, 2023, and 2024, respectively. These unemployment rates were below those of the state of Virginia, who reported averages of 2.7, 2.7, and 2.9 percent for 2022, 2023, and 2024, respectively. The national unemployment averages were higher than those of the AA, at 3.6, 3.6, and 4.0 percent, for 2022, 2023, and 2024, respectively.

OCC Examiners obtained economic data for the Washington AA from the Moody's Analytics Report as of February 2025. This report indicated that the economic drivers for the area are non-defense sectors of the federal government, defense spending, and high-tech industries. The report identified several strengths and weaknesses of the Washington MSA. Strengths include high per capita income, an educated workforce, status as a major center for computer systems design and tech-related professional services, and popularity as a tourist destination. However, challenges such as exposure to downturns in tourism, above-average living costs, high reliance on federal government employment, and significant business and regulatory costs were noted. The top employers for the area are the federal government, Inova Health System, MedStar Health, Marriott International, Inc., Booz Allen Hamilton, and The University of Maryland.

Housing

The Washington AA provides sufficient opportunity to lend to low-, and moderate-income (LMI) geographies within the AA. The 2022 – 2024 evaluation period reported no low-income geographies, and

11 moderate-income geographies located within the 34 CTs. The majority of the CTs, 52.94 percent, are in middle-income geographies. Housing units within the LMI geographies are comparable to middle- and upper-income geographies. There are 53,589 total housing units in the AA, of which 67.97 percent are owner-occupied, 21.91 percent are rental-occupied, and 10.11 percent are vacant housing units. Housing units in moderate- income geographies represent 47.35 percent of total housing units in the AA, compared to 48.16 percent in middle-income geographies and 4.49 percent in upper-income geographies.

Home ownership in LMI geographies may be difficult due to high median housing prices compared to median family income. According to the 2020 U.S. Census, the median housing value was \$378,300 and is relatively high for LMI households in the AA. The 2020 U.S. Census reported the Arlington-Alexandria-Reston, VA-WV-MD Metropolitan Division Median Family Income was \$135,790, which would result in annual income for low-income households below \$67,895, and a moderate-income household annual income between \$67,895 and \$108,632. These income levels could make it difficult to afford housing at the median housing value in this AA for LMI borrowers.

Community Contacts

As part of the evaluation, OCC examiners reviewed a community contact completed by the FDIC for institutions located in the Washington CSA AA. The contact was a nonprofit real estate developer that owns and preserves residential housing throughout Northern Virginia, Washington, D.C. and Maryland areas. This organization provides safe and affordable housing to more than 5,000 people in the DC area through multi-family housing communities. The target audience for this organization is to lend to tenants earning between 30-80 percent of area median income. The contact stated there is a significant need for affordable housing in the AA. The contact said that most LMI cannot obtain safe and affordable housing in the Washington D.C. Area. The organization has had positive interactions with local area banks and stated that local banks were interested in partnering in affordable housing projects.

OCC examiners also reviewed a Community Needs Assessment conducted by the OCC for financial institutions in Washington D.C. Metro area: Washington D.C., Maryland, and Virginia. Several organizations were involved in this listening session. The organizations identified credit needs for startup costs for businesses, financial literacy courses, and nonprofit funding sources with multiyear commitments and/or partnerships as primary needs in the area. Organizations shared several programs they offer to address various community needs, such as Bank of America Student Internship Program, Guaranteed Income Program, and Financial Literacy Outreach.

Scope of Evaluation in Virginia

OVNB operates only in the state of Virginia. The OCC performed a full-scope review of the Washington AA for the evaluation period. Refer to Appendix A for a list of all AAs under review.

As previously noted, the bank's primary loan product were home mortgage and small business loans, which was reflective of the bank's business strategy during the evaluation period. The OCC compared the bank's small business lending performance from 2022, 2023 and 2024 to Dunn and Bradstreet (D&B) demographic and CRA aggregate data for each respective year.

Refer to appendix A for more information on this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in Virginia is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Virginia was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The percentage of home mortgage loans originated in moderate-income CTs was below the percentage of owner-occupied housing units in moderate-income CTs and near to the percentage of aggregate lending. The bank's AA has no low-income CTs.

Small Loans to Businesses

Refer to Table 9 in the state of Virginia section of 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.

In moderate-income geographies, the percentage of small business lending was below the percentage of businesses in those geographies and near to the aggregate lending performance. The bank's AA has no low-income CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Washington AA to determine if any unexplained, conspicuous gaps existed. The OCC reviewed summary reports, maps, and analyzed OVNB's lending

activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of bank's home mortgage loans originations and purchases.

The percentage of home mortgage loans to low-income borrowers is near to the percentage of low-income families and exceeds the percentage of aggregate lending. The percentage of home mortgage loans to moderate-income borrowers is below the percentage of moderate-income families and the percentage of aggregate lending.

Small Loans to Businesses

Refer to Table 10 in the state of Virginia section of 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.

The percentage of small loans to businesses with revenues of \$1 million or less is below the percentage of businesses reporting revenues of \$1 million or less and near to the percentage of aggregate lending.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Virginia is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans

| Assessment Area | Total | | | |
|-----------------|-------|--------------|-----------|---------------|
| | # | % of Total # | \$(000's) | % of Total \$ |
| Washington AA | 7 | 100.00 | 2,588 | 100.00 |

During the evaluation period, the bank originated, renewed, or refinanced seven qualifying community development loans totaling \$2.6 million. These loans were extended to two different non-profit organizations for affordable housing, community development, or revitalization/stabilization needs in the AA.

The following are examples of CD loans the bank originated or purchased in this AA:

- Four loans totaling \$1.6 million were made to a non-profit organization that provides stable housing and emergency support to low-income individuals, families, and seniors in Loudon County and Fauquier County.
- Three loans totaling \$1.0 million were made to a non-profit organization that provides affordable housing to low-income individuals and families in Fauquier County. Funding will be used for construction costs to support the entity's core mission of building affordable housing.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments. This table included all CD investments, including prior period investments that remain outstanding as of the examination date.

Table 4: Qualified Investments

| Assessment Area | Prior Period | | Current Period | | Total | | | Unfunded Commitments | | |
|-----------------|--------------|-----------|----------------|-----------|-------|--------------|-----------|----------------------|---|-----------|
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Washington AA | 0 | 0 | 10 | 9 | 10 | 100.00 | 9 | 100.00 | 0 | 0 |

During the evaluation period, OVNB granted donations to ten organizations in the AA, totaling \$9,000. These donations supported affordable housing, homeless services, financial education and other essential community services in the AA.

The bank did not have any qualified investments in the AA during the evaluation period or prior period.

Extent to Which the Bank Provides Community Development Services

Nine employees provided financial expertise and/or technical services and support to 11 qualified community development organizations in the AA. Employee hours totaled 171.5. Examples were:

- One employee provided organizational skills and financial expertise to two CD organizations whose mission is to provide housing and healthcare services to LMI individuals and families in the AA.
- One employee provided lending and credit administration expertise to two CD organizations whose mission is to provide affordable housing to LMI families in the AA.

- One employee provided financial expertise for a non-profit CD organization whose purpose is to provide community services to LMI individuals, such as food, clothing and temporary shelter.
- Six employees provided financial literacy training to low-income students and adults and served in various capacities that involved the provision of financial services for organizations that provide services to LMI individuals and families.

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 MSA(s) and non-MSA(s) 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: | 01/01/2022 through 12/31/2024 | |
| Bank Products Reviewed: | Home mortgage loans, small business loans Community development loans, qualified investments, community development services | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| NONE | Not applicable | Not applicable |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| Virginia | | |
| Washington-Arlington-Alexandria, DC-VA-MD-WV MSA | Full Scope | The AA includes all census tracts in Culpeper, Fauquier, and Rappahannock counties in Virginia, and two census tracts (6108 and 6109) in Loudoun County, Virginia. |

Appendix B: Summary of State Ratings

| RATINGS | | | |
|------------------------|-----------------------------|-----------------------|---|
| Overall Bank: | Lending Test Rating* | CD Test Rating | Overall Bank/State/Multistate Rating |
| Oak View National Bank | Satisfactory | Satisfactory | Satisfactory |
| State: | | | |
| Virginia | Satisfactory | Satisfactory | Satisfactory |

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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 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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.

Table 9. 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 AA.

Table 10. 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.

| Assessment Area: | 2022 - 2024 | | | | | | | | | | | | | | | | | | |
|--|---------------------------|---------------|-------------------|----------------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|--------------|-----------------------------------|--------------|--------------|-----------------------------------|--------------|--------------|-----------------------------------|--------------|-------------|
| | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ (000) | % of Total Number | Overall Market (000) | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate |
| Washington-Arlington-Alexandria, DC-VA-MD-WV MSA | 104 | 36,644 | 100.00 | 9,233 | -- | -- | -- | 45.07 | 31.73 | 36.03 | 49.81 | 62.50 | 49.16 | 5.12 | 5.77 | 14.81 | -- | -- | -- |
| Total | 104 | 36,644 | 100.00 | 9,233 | -- | -- | -- | 45.07 | 31.73 | 36.03 | 49.81 | 62.50 | 49.16 | 5.12 | 5.77 | 14.81 | -- | -- | -- |

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "-- data not available.
Due to rounding, totals may not equal 100.0%

| Assessment Area: | 2022 - 2024 | | | | | | | | | | | | | | | | | | |
|--|---------------------------|---------------|-------------------|----------------------|----------------------|--------------|--------------|---------------------------|--------------|--------------|-------------------------|--------------|--------------|------------------------|--------------|--------------|--------------------------------|--------------|--------------|
| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| | # | \$ (000) | % of Total Number | Overall Market (000) | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate |
| Washington-Arlington-Alexandria, DC-VA-MD-WV MSA | 104 | 36,644 | 100.00 | 9,233 | 26.11 | 25.96 | 11.56 | 23.26 | 15.38 | 21.50 | 21.71 | 19.23 | 23.78 | 28.93 | 30.77 | 26.60 | -- | 8.65 | 16.56 |
| Total | 104 | 36,644 | 100.00 | 9,233 | 26.11 | 25.96 | 11.56 | 23.26 | 15.38 | 21.50 | 21.71 | 19.23 | 23.78 | 28.93 | 30.77 | 26.60 | -- | 8.65 | 16.56 |

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "-- data not available.
Due to rounding, totals may not equal 100.0%

| Assessment Area: | Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | 2022 - 2024 | | | |
|--|--|---------------|-------------------|----------------------|-------------------|--------------|-------------|------------------------|--------------|--------------|----------------------|--------------|--------------|---------------------|--------------|--------------|-----------------------------|--------------|-------------|
| | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ (000) | % of Total Number | Overall Market (000) | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate |
| Washington-Arlington-Alexandria, DC-VA-MD-WV MSA | 70 | 22,721 | 100.00 | 7,138 | -- | -- | -- | 40.08 | 28.57 | 31.79 | 53.83 | 70.00 | 53.22 | 6.08 | 1.43 | 14.99 | -- | -- | -- |
| Total | 70 | 22,721 | 100.00 | 7,138 | -- | -- | -- | 40.08 | 28.57 | 31.79 | 53.83 | 70.00 | 53.22 | 6.08 | 1.43 | 14.99 | -- | -- | -- |

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Assessment Area: | Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | | | | 2022 - 2024 | | |
|--|--|---------------|---------------|--------------|---------------------------------|--------------|-------------------|----------------------|--------------------------------|--------------|--------------|--------------|--|--------------|--------------|--------------|--------------|--------------|
| | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | | Businesses with Revenues > 1MM | | | | Businesses with Revenues Not Available | | | | | |
| | | | | | # | \$ (000) | % of Total Number | Overall Market (000) | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | % Businesses | % Bank Loans | % Businesses |
| Washington-Arlington-Alexandria, DC-VA-MD-WV MSA | 70 | 22,721 | 100.00 | 7,138 | 86.04 | 57.14 | 54.08 | 7,138 | 86.04 | 57.14 | 54.08 | 7.26 | 37.14 | 7.26 | 37.14 | 6.70 | 5.71 | 6.70 |
| Total | 70 | 22,721 | 100.00 | 7,138 | 86.04 | 57.14 | 54.08 | 7,138 | 86.04 | 57.14 | 54.08 | 7.26 | 37.14 | 7.26 | 37.14 | 6.70 | 5.71 | 6.70 |

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%