



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

July 29, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Resource Bank, NA
Charter Number: 5815

555 Bethany Road
DeKalb, IL 60115

Office of the Comptroller of the Currency

2001 Butterfield Road
Suite 400
Downers Grove, IL 60515

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 is based on Resource Bank, NA's (RBNA) reasonable loan-to-deposit (LTD) ratio; RBNA originated a majority of loans within the AAs during the evaluation period; RBNA's reasonable distribution of loans to borrowers of different income and businesses of different sizes; and RBNA's excellent geographic distribution of loans. Additionally, RBNA did not receive any complaints regarding its Community Reinvestment Act (CRA) performance during the evaluation period.
- The Community Development (CD) Test rating is based on that RBNA demonstrated adequate responsiveness to the CD needs of its assessment areas (AA)s by engaging in a combination of CD loans, qualified investments, and CD services that helped address identified needs for community services and affordable housing for low- and moderate-income individuals and promote economic development.

Loan-to-Deposit Ratio

Considering RBNA's size, financial condition, and the credit needs of its AAs, the bank's LTD ratio is reasonable. During the 12-quarter period ending December 31, 2024, the bank's quarterly LTD ratio averaged 61.1 percent, with a high of 68.2 percent in the second quarter of 2024 and a low of 50.2 percent in the first quarter of 2022. The bank's LTD ratio has been on a consistent upward trend over the evaluation period, except for nominal decreases during the last two quarters of 2024. The LTD ratio is calculated on a bank-wide basis.

We compared RBNA to 16 similar financial institutions in the AAs with asset sizes between \$117 million and \$1.8 billion. The quarterly peer group average was 73.5 percent with RBNA ranking the fifth lowest out of the 17 institutions.

Lending in Assessment Area

A majority of RBNA's loans were originated or purchased inside of its AAs. During the evaluation period, RBNA originated or purchased 62.4 percent of its home mortgage and business loans from inside the AAs. This analysis is performed at the bank rather than the AA level and 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										20XX
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	215	60.22	142	39.77	357	37,662	42.82	50,287	57.18	87,949
Small Business	45	75.00	15	25.00	60	8,440	68.12	3,949	31.87	12,389
Total	260	62.35	157	37.65	417	46,102	45.95	54,236	54.05	100,338
Source: Home Mortgage Data Application (HMDA) Loan/Application Registers (LARs) for January 1, 2022, through December 31, 2024, was used for home mortgages. Additionally, a random sample of 60 small loans to businesses (loan amounts of \$1 million or less) originated between January 1, 2022, and December 31, 2024, was utilized for business loan information.										

Description of Institution

As of December 31, 2024, RBNA is a \$813 million intrastate financial institution headquartered in DeKalb, Illinois. It is a full-service bank that offers conventional deposit and loan products as well as internet, mobile, and telephone banking. The bank is a wholly owned subsidiary of Resource Bancshares, Inc (RBI). The bank does not have any other affiliates and has not engaged in any merger or acquisition activities since the prior CRA performance evaluation.

RBNA has fifteen offices in Cortland, DeKalb, Earlville, Genoa, Hampshire, Hinckley, Kaneville, Kirkland, Leland, Malta, Serena, Shabbona, Somonauk, and Sycamore, Illinois. Banking services are offered on extended hours and include drive-up services seven days a week at six locations. All locations have non-deposit-taking automated teller machines (ATMs). The bank opened the Kaneville branch during 2023 and the Earlville branch, which is located in a distressed middle-income nonmetropolitan census tract, during 2024. There were no other branch openings or closing during the evaluation period.

RBNA has two AAs in the state of Illinois. One AA consists of DeKalb County and five CTs in Kane County titled MSA AA. The AA is located in the Elgin IL Metropolitan Division (MD) #20994 in the Chicago-Naperville-Elgin, IL-IN Metropolitan Statistical Area (MSA) #16980. The other AA consists of four CTs that make up a portion of LaSalle County in a non-metropolitan statistical area titled Non-MSA AA.

As of December 31, 2024, the bank's loan portfolio totaled \$508 million, or 62.5 percent of total assets. The bank participates in several government guaranteed home and farm loan programs and is a Small Business Administration preferred Express Lender. The bank also offers asset management services and insurance products. Retail investment services are provided through Cetera Investment Services LLC.

The following table provides additional information regarding the bank’s loan portfolio mix:

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Business Loans, including Commercial Real Estate	45.58
Home Loans, including Multifamily	37.25
Farm Loans, including Farmland	15.15
Consumer loans	1.04
Other Loans	0.98
<i>Source: Loan Mix per December 31, 2024, Uniform Bank Performance Report (UBPR)</i>	

This examination did not identify any legal, financial, or other factors that would impede the bank’s ability to help meet the credit needs of its AAs, including low- and moderate-income families and neighborhoods. At the previous CRA evaluation dated June 13, 2022, RBNA received a rating of “Outstanding” under the Intermediate Small Bank CRA evaluation procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation addresses RBNA’s CRA performance from January 1, 2022, through December 31, 2024. We evaluated the bank’s CRA performance using the Interagency Intermediate Small Bank (ISB) examination procedures, which include a Lending Test and a Community Development Test. The Lending Test evaluates the bank’s record of meeting the credit needs of the AAs through its lending activities. The Community Development Test evaluates the bank’s responsiveness to CD needs of its AAs through loans, qualified investments, and services with a CD purpose during the evaluation period.

Based on our review of the number and dollar volume of loans originated or purchased by RBNA during the evaluation period, the bank’s primary lending products are business loans and home mortgage loans. Our conclusions regarding the bank’s lending performance are based on the bank’s home mortgage lending, as reported on the bank’s HMDA Loan Application Registers (LAR). We validated the reliability of the 2022, 2023, and 2024 HMDA data during a prior examination. We utilized a total sample of 76 small business loans in our evaluation that included 41 loans within the MSA AA and 20 loans within the Non-MSA AA to assess lending in geographies of different income levels and lending to borrowers of different incomes or businesses of different sizes.

Selection of Areas for Full-Scope Review

RBNA has two AAs located in the State of Illinois, however, we completed a full-scope review solely of the MSA-AA. For this analysis, \$43.4 million of the bank's total capital is allocated to the MSA AA. Refer to the table in Appendix A for more information on the scope of the review.

Ratings

RBNA's overall CRA rating is based on its performance in both of the bank's AAs. The bank's performance in the MSA AA received more weight in our analysis as a substantial majority of the bank's loans, deposits, and branches are within this AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, 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 Illinois¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- RBNA's distribution of loans among borrowers of different incomes is reasonable.
- RBNA's distribution of loans in geographies of different income levels within its AAs is excellent.
- As this is an intrastate institution, the reasonable LTD ratio and a majority of the loans made within the AAs were considered in the state lending test.
- RBNA demonstrated adequate responsiveness to the CD needs of its AAs by engaging in a combination of CD loans, qualified investments, and CD services that helped address identified needs for community services and affordable housing for low- and moderate-income individuals and promote economic development.

Description of Institution's Operations in Illinois

All of RBNA's operations are in Illinois. The bank has two AAs located in the State of Illinois. The MSA AA consists of all 22 CTs in DeKalb County and five CT in Kane County, which are part of the Elgin, IL MD #20994 in the Chicago Naperville-Elgin, IL-IN MSA #16980. There is one low-income CT and six moderate-income CTs in this AA. The Non-MSA AA consists of four CTs in LaSalle County. There are no low- or moderate-income CTs in the Non-MSA AA, although all four CTs are distressed middle-income non-metropolitan areas. We completed a full scope review only of the MSA AA, therefore, this section focuses solely on the MSA AA.

According to the Bureau of Labor Statistics (BLS), unemployment rates for both AAs have improved since the peak of unemployment rates in January 2022 and are comparable to the state average but slightly higher than the national average as of December 31, 2024. Unemployment in the MSA AA is lower than within the Non-MSA AA.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Annual Unemployment Rates				
Area	2022	2023	2024	Peak
DeKalb County	4.40%	4.70%	4.70%	5.80%
Kane County	4.50%	5.00%	5.00%	6.40%
LaSalle County	5.00%	5.70%	5.70%	7.60%
State of Illinois	4.60%	4.50%	5.00%	5.70%
National	3.50%	3.80%	4.10%	4.00%
Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of January 31, 2022.				

MSA AA

Demographic Information of the Assessment Area (MSA AA)						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.57	21.43	60.71	3.57	10.71
Population by Geography	123,547	4.74	21.57	64.41	1.72	7.56
Housing Units by Geography	51,101	6.57	24.19	60.84	1.58	6.83
Owner-Occupied Housing by Geography	30,336	0.04	28.05	66.23	2.06	3.62
Occupied Rental Units by Geography	17,636	16.67	18.14	53.81	0.75	10.63
Vacant Units by Geography	3,129	12.98	20.77	48.16	1.53	16.55
Businesses by Geography	3,374	1.45	25.58	67.55	2.43	2.99
Farms by Geography	327	0.00	8.56	82.57	8.56	0.31
Family Distribution by Income Level	29,058	23.83	22.11	21.67	32.39	0.00
Household Distribution by Income Level	47,972	32.25	18.46	19.53	29.76	0.00
Unemployment rate (%)	6.02	11.07	5.05	5.25	2.90	12.47
Households Below Poverty Level (%)	15.32	54.95	12.01	11.46	5.54	29.98
Median Family Income (20994 - Elgin, IL MD)		\$97,326	Median Housing Value		\$190,000	
Median Family Income (20994 - Elgin, IL MD) for 2024		\$113,700	Median Gross Rent		\$954	
			Families Below Poverty Level		8.98	
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						

The MSA AA is located 64 miles west of Chicago, Illinois. RBNA has 12 branches in the MSA AA. Only one of the offices, in DeKalb, Illinois, is located in a moderate-income CTs. This AA provides a strong majority (96.4 percent) of the bank's total deposits.

Competition for deposits in this AA is strong. According to the June 30, 2024, FDIC Deposit Market Share Report, RBNA's deposits from the MSA AA totaled \$704 million. The bank ranked seventh out of 31 deposit-taking institutions in the AA with a 4.1 percent share of the market. The largest institutions by deposit market share were JP Morgan Chase Bank N.A. (19.8 percent), St. Charles Bank & Trust Company, N.A. (11.8 percent), and Old Second N.A. (10.3 percent). All three banks are significantly larger in asset size than RBNA.

Primary industries in DeKalb County include healthcare and social assistance, educational services, and retail trade, according to Data USA (2023). The largest single employer in the county is Northern Illinois University, followed by the Kishwaukee Health System. Within the AA, there are approximately 3,374 businesses and 76.1 percent (2,567) are small businesses with gross annual revenues of \$1 million or less, 10.6 percent (358) are businesses with gross annual revenues of over \$1 million, and 13.3 percent (449) are businesses that did not report revenue information.

There are limited home loan opportunities within the low-income census tract. There are a total of 3,357 housing units within the census tract. However, only 14 are owner-occupied units. A majority of the units are occupied rental units, as this census tract includes Northern Illinois University. Business lending opportunities in the low-income census tract are also limited with only 49 businesses located within the census tract.

Community Contacts

We obtained information from two community contacts who work for public and private organizations that promote industrial and economic development in DeKalb and Kane Counties. One contact indicated that economic development in DeKalb county is strong and thriving. That contact also indicated that, during the review period, there were multiple major companies that moved part of their operations to DeKalb, Illinois, given the county's good water system, strong electric grid and updated roads. This community contact mentioned that RBNA was active in lending to start-up businesses. Low- and moderate-income individuals have obtained employment by these large companies improving job availability in the area. Another community contact indicated that there continues to be a need for additional capital in Kane County to fund new and ongoing projects in the area. The contact stated there could be more support of small businesses through access to capital and liquidity.

Scope of Evaluation in Illinois

Both of the bank's AAs are in the state of Illinois. We completed a full-scope review of the MSA AA. Twelve of the bank's fifteen branches are located in the MSA AA, including the main office. Additionally, a substantial majority of deposits and loans are distributed among the MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, RBNA's lending performance in the state of Illinois is Satisfactory.

Distribution of Loans by Income Level of the Geography

RBNA's geographic distribution of loans within its MSA AA is excellent based on the bank's lending performance in that AA. The OCC did not identify any unexplained conspicuous gaps, taking into consideration performance context factors.

Home Mortgage Loans

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

RBNA's geographic distribution of home mortgage loans in the MSA AA is excellent. In arriving at this conclusion, we placed more weight on the bank's lending in moderate-income CTs during the evaluation period, as there were limited lending opportunities in the only low-income CT in its AA. The bank exceeded both the percentage of the AA's owner-occupied housing units located in the moderate-income CTs and the percentage of aggregate lending that occurred in moderate-income CTs. While the bank did not have any home mortgage loans originated in the low-income CT, the overall percentage of the AA's owner-occupied housing units located in low-income CTs is extremely low.

Small Loans to Businesses

Refer to Table 9 in appendix D for the facts and data used to evaluate the bank's geographic distribution of small loans to businesses.

RBNA's distribution of small loans to businesses in geographies of different income levels in the MSA AA is excellent. The bank's percentage of small loans to businesses in the MSA AA's moderate-income CTs exceeded both the percentage of the AA's businesses that are located in the moderate income CTs and the percentage of aggregate lending that occurred in the moderate-income CTs. Our sample did not contain any small loans to businesses in low-income CTs, however, we placed more weight on bank performance in the moderate-income CTs due to the limited number of businesses in the only low-income CT.

Lending Gap Analysis

The OCC evaluated the lending distribution in the MSA-AA to determine if any unexplained, conspicuous gaps existed. Examiners reviewed summery reports, maps, and analyzed the bank'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 and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

RBNA's distribution of home mortgage loans to individuals of different income levels in the MSA AA is reasonable. During the review period, the percentage of home mortgage loans originated to low-income borrowers was below the percentage of the AA's families that were low-income yet higher than the aggregate lending that occurred to low-income borrowers. In contrast, the percentage of home mortgage loans originated to moderate-income borrowers met the percentage of the AA's families that were moderate-income yet was lower than the percentage of aggregate lending that occurred to moderate-income borrowers.

Small Loans to Businesses

Refer to Table 10 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.

RBNA's distribution of small loans to businesses of different sizes in the MSA AA is reasonable. While the bank's percentage of loans to businesses with \$1 million or less in annual gross revenue was less than the percentage of AA businesses with \$1 million or less in annual gross revenue, it was comparable to the percentage of aggregate lending that occurred to businesses with \$1 million or less in annual gross revenue.

Responses to Complaints

RBNA did not receive any complaints regarding its CRA performance during the evaluation period. The OCC has not received any written complaints, comments, or inquiries concerning the bank and its efforts to comply with the spirit and intent of the CRA.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Non-MSA AA was stronger than the overall performance under the Lending Test in the full scope area. The bank's loans in the Non-MSA AA were favorable to demographic and aggregate comparators for distribution of loans by income level of the borrower and size of business.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Illinois is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on our full-scope review of the MSA AA, RBNA exhibits adequate responsiveness to community development needs through a combination of community development loans, qualified investments, and community development services, as appropriate, considering both the bank's capacity and the need and availability of such opportunities for community development.

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 loans, including multifamily loans, that qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA AA	7	70.00	1,663	88.10
Non MSA AA	-	-	-	-
Statewide/Regional	3	30.00	225	11.90
Total	10	100.00	1,888	100.00

MSA AA

The MSA AA lending activity represents adequate responsiveness. Throughout the evaluation period, the bank originated a total of seven CD loans within the AA totaling \$1.7 million representing 2.7 percent of allocated tier 1 capital.

Bank CD loans were responsive to community services and economic development efforts in the bank's MSA AA. Of the seven qualifying CD loans, four loans totaling \$842,000 provided community services targeted to LMI individuals, and three loans totaling \$820,900 promoted economic development.

Some examples of CD loans in the MSA AA:

- The bank made one loan totaling \$300,000 to support community services. The loan provided funding to a non-profit organization that offers food pantry services to LMI individuals.
- The bank made two loans totaling \$665,400 to promote economic development. The loans provided a small business with financing to purchase vehicles and equipment needed to expand operations and employ LMI Individuals.

Statewide/Regional

In addition to the MSA AA, the bank made three regional loans totaling \$1.8 million that received partial CD credit totaling \$224,767, correlating to the number of affordable housing units reserved for LMI individuals within the Rockford, IL MSA.

Number and Amount of Qualified Investments

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)
MSA AA	8	800	40	443	48	88.89	1,243	70.90	0	0
Non-MSA AA	2	504	4	6	6	11.1-	510	29.10	0	0
Total	10	1,304	44	449	54	100.00	1,753	100.00	0	0

MSA AA

RBNA's level of qualified CD investments demonstrated adequate responsiveness to the needs of the MSA AA. During the evaluation period, the bank made 40 donations totaling \$443,000 to community service and economic development organizations and retained 8 prior period school bond investments totaling \$800,000, for an overall total of \$1.2 million or 1.9 percent of allocated tier 1 capital.

Some examples of Qualified Investments in the MSA AA:

- The bank made a donation of interest, totally \$19,689, on a loan to an agency that supports LMI individuals through community service and affordable housing.
- The bank invested \$402,000 in a local school district providing community services to LMI.

Extent to Which the Bank Provides Community Development Services

MSA AA

RBNA provided adequate responsiveness level of CD services in the MSA AA. During the evaluation period, 13 employees performed CD services supporting 14 non-profit organizations for a total of 1,369 hours. Notable CD services in the AA include 78 service hours provided by an employee serving as Vice Chairman of the Board for an organization that provides food, clothing, and housing services to LMI individuals, 63 service hours provided by another employee serving as Treasurer for an organization that provides educational grants to LMI children, and 27 service hours provided by another employee serving as Treasurer for an organization that provides court advocacy services to LMI children.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the bank's Non-MSA AA was consistent with the bank's overall performance under the CD Test in the full scope area.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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 to 12/31/2024)	
Bank Products Reviewed:	Home mortgage and small loans to businesses, community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MSA-AA	Full-Scope	All of DeKalb County and CTs # 8507.03, 8507.04, 8507.05, 8507.06, 8524.03 in Kane County. This is a portion of Elgin IL MD #20994, which is in the Chicago-Naperville-Elgin IL-IN MSA
Non-MSA AA	Limited-Scope	CTs # 9617.01, 9617.02, 9618.00, 9623.00 in LaSalle County.

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Resource Bank, N.A	Satisfactory	Satisfactory	Satisfactory
State:			
Illinois	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.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% 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
MSA AA	176	33,815	81.86	6,447	0.04	--	0.26	28.05	28.41	22.27	66.23	69.89	69.68	2.06	1.14	2.17	3.62	0.57	5.62
Non-MSA AA	39	3,847	18.14	916	--	--	--	--	--	--	35.81	30.77	32.42	64.19	69.23	67.58	--	--	--
Total	215	37,662	100.00	7,363	0.03	--	0.23	23.33	23.26	19.50	61.11	62.79	65.04	12.52	13.49	10.31	3.01	0.47	4.92

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%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
MSA AA	176	33,815	81.86	6,447	23.83	16.48	14.32	22.11	22.16	29.33	21.67	25.00	24.43	32.39	30.68	16.63	--	5.68	15.29
Non-MSA AA	39	3,847	18.14	916	14.89	12.82	4.59	12.23	30.77	15.50	21.35	20.51	21.94	51.53	30.77	44.43	--	5.13	13.54
Total	215	37,662	100.00	7,363	22.41	15.81	13.11	20.55	23.72	27.61	21.62	24.19	24.12	35.42	30.70	20.09	--	5.58	15.08

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%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2024
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MSA AA	41	8,045	67.21	3,559	1.45	--	0.70	25.58	29.27	21.92	67.55	70.73	69.12	2.43	--	3.71	2.99	--	4.55
Non-MSA AA	20	2,411	32.79	455	--	--	--	--	--	--	34.90	60.00	23.52	65.10	40.0	76.48	--	--	--
Total	61	10,456	100.0	4,014	1.28	--	0.62	22.47	19.67	19.43	63.58	67.21	63.95	10.05	13.12	11.96	2.63	--	4.04

Source: FFIEC File - 2020, 2024 Census; Our sample contained 61 small business loans within the bank's assessment areas that were originated, renewed or purchased during the three years in our review period (1/1/2022 - 12/31/2024), 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MSA AA	41	8,045	67.21	3,559	76.08	53.66	54.73	10.61	46.34	13.31	--
Non-MSA AA	20	2,411	32.79	455	77.94	80.00	56.26	10.71	20.00	11.35	--
Total	61	10,456	100.00	4,014	76.31	62.30	54.91	10.62	37.70	13.07	--
Source: FFIEC File - 2020, 2024 Census; Our sample contained 61 small business loans within the bank's assessment areas that were originated, renewed or purchased during the three years in our review period (1/1/2022 - 12/31/2024), 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											