



PUBLIC DISCLOSURE

January 5, 2026

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Southtrust Bank, NA
Charter Number: 14012
601 Guadalupe St
George West, Texas 78022

Office of the Comptroller of the Currency
10001 Reunion Place, Suite 250
San Antonio, TX 78216

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 a reasonable loan-to-deposit (LTD) ratio, a reasonable geographic distribution, and a reasonable borrower distribution of loans to individuals of different income levels and to businesses of different sizes.
- The Community Development (CD) Test rating is based on an overall satisfactory responsiveness to community development needs through CD loans, qualified donations, and CD services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment areas (AAs), the bank's LTD ratio was reasonable.

SouthTrust Bank's (STB or bank) average quarterly LTD ratio from March 31, 2022, to December 31, 2024, ranged from a low of 52.15 percent to a high of 69.68 percent, with a quarterly average of 63.23 percent.

To assess the bank's performance, we compared its average quarterly LTD ratio to four similarly situated institutions. The average LTD ratio of the other institutions was 67.83 percent ranging from an average low of 59.97 percent to an average high of 72.70 percent.

Lending in Assessment Area

A majority of the bank's loans were outside its AAs.

The bank originated and purchased 35.29 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The bank did not have any affiliate lending activities included in this assessment. Performance is less than satisfactory but did not have a large impact on the bank's overall rating. As the bank is a HMDA reporter, the full population of mortgage loan data was available and skews performance in this test compared to the sample of loans selected for commercial loans. A substantial majority of the commercial loans were made inside the bank's AA and 343 commercial loans were originated over the evaluation period, similar to the number of HMDA loans originated. As the sample is representative of the entire population, it's reasonable to conclude that the majority of the entire population of commercial loans is also within the AA and would improve the total percentage of loans in the AA.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	117	29.32	282	70.67	399	41,098	40.71	59,863	59.29	100,961
Small Business	45	75.00	15	25.00	60	21,032	82.85	4,353	17.15	25,385
Total	162	35.29	297	64.71	459	62,130	49.17	64,216	50.83	126,346

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

STB is a full-service, single-state community bank headquartered in George West, Texas that was chartered in 1934. The bank is wholly owned by Live Oak Bancshares Corporation, a single bank holding company. There have not been any significant changes to STB's corporate structure, including merger or acquisition activities, since the last CRA performance evaluation. STB has a main office located in George West and seven branches: one each in Three Rivers, Pleasanton, Floresville, San Antonio, and Sugarland and two in Houston, Texas. The bank has three AAs: Live Oak County AA, Harris-Fort Bend County AA, and the Atascosa-Wilson-Bexar County AA.

As of December 31, 2024, the bank reported total assets of \$563 million. Tier 1 capital totaled \$64 million resulting in a tier 1 leverage ratio of 11.08 percent. Loans totaled \$330 million and represented 62 percent of total assets. The bank's loan portfolio was comprised of \$204 million or 62 percent commercial, \$117 million or 35 percent residential real estate/mortgages, \$4 million or 1 percent consumer loans and \$5 million or 2 percent farmland and agriculture loans.

Based on the bank's financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit the bank's ability to help meet credit needs within its AAs. The prior CRA performance evaluation dated November 21, 2022, assigned an overall "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated STB's CRA performance utilizing the Intermediate Small Bank examination procedures. The evaluation period covered loans originated or purchased from January 1, 2022, through December 31, 2024. The bank's primary lending products during the evaluation period were residential mortgages and commercial loans. In 2024, the FFIEC updated census tract income designations in the Harris-Fort Bend County AA; as such, evaluation of the Harris-Fort Bend County AA was broken into two assessment periods, 2022 - 2023 and 2024. To evaluate lending performance, we reviewed all HMDA reportable loans originated by the bank and selected a random sample of loans to small businesses. We also evaluated CD loans, investments, and services, for the same period.

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.

STB has three AAs; the Harris-Fort Bend County AA received a full-scope review while the Live Oak County AA and the Atascosa-Wilson-Bexar County AA received limited-scope reviews. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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 Texas

CRA rating for the State of Texas: 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 reasonable geographic distribution of loans.
- The bank exhibits reasonable distribution of loans to borrowers of different income levels and businesses of different sizes.
- There were no CRA related complaints during the evaluation period.
- The bank exhibits reasonable responsiveness to community development needs through CD loans, qualified donations, and CD services.

Description of Institution's Operations in Texas

The bank operates seven branches throughout south-central Texas. The bank offers traditional products and services such as checking accounts, savings accounts, certificates of deposit, and consumer and commercial loans. The bank also offers a 24-hour telephone banking system, as well as internet and mobile banking with Bill Pay. Four branches have non-deposit taking ATMs, while the branch in Sugarland and the two branches in Houston do not have ATMs. Competition varies depending on geography, and ranges from small local businesses to large national financial institutions, including non-traditional financing companies.

Harris-Fort Bend County AA

Harris and Fort Bend County are large counties that include much of the cities of Houston and Sugar Land and are located in the Houston-The Woodlands-Sugar Land MSA. The AA contains all census tracts (CTs) in both counties. The bank currently operates three branches within the AA. There are 1,248 CTs in the AA with 16 percent of those designated as low income and 27 percent of those designated as moderate income. The AA designation is reasonable and does not arbitrarily exclude low or moderate income CTs.

The December 31, 2024, FDIC Market Share report indicated 90 financial institutions operate in the AA with deposits totaling \$280 billion. STB ranks 62nd in the deposit market share report and accounts for 0.04 percent of the market share with \$114 million in deposits. STB faces strong competition in the AA including large, regional, and community banks.

Based on examiner analysis, home affordability in the AA was identified as a limiting factor in the bank's ability to lend to low-income individuals. Assuming a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$48,700 per year (or less than 50 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$203,069 mortgage with a

payment of \$1,218 per month. A moderate-income borrower making \$77,920 per year (or less than 80 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$324,910 mortgage with a payment of \$1,948 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,940. The median housing value in the AA grew from \$357,655 in 2022 to \$361,405 in 2024 reflecting a 1.05 percent increase according to Realtor.com data.

According to Moody’s Analytics as of August 2025, the economy in the MSA will grow at a slow pace over the coming year, in line with the nation. Longer term, the concentration of energy-related industries, above-average population growth, and expansion in housing, transportation and distribution will help propel above average gains. Infrastructure improvements at Port of Houston and airport system are boosting nonresidential construction. Top employers include NASA, UT Medical Branch, and ExxonMobil.

To help identify needs and opportunities in the AA, examiners reviewed two community contacts in the Harris-Fort Bend County AA. The contacts included organizations that promote job growth, help existing companies expand, and focus on child advocacy. The primary needs included affordable housing, and financial literacy. Contacts indicated that financial institutions in the area have been meeting lending demands, and that institutions regularly participate in local events and make good efforts to accommodate various loan demands.

Assessment Area(s) - Harris-Fort Bend County 2022 - 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,248	16.27	27.00	24.52	29.09	3.13
Population by Geography	5,553,924	12.89	25.56	27.33	32.53	1.68
Housing Units by Geography	2,056,155	13.81	25.42	26.30	32.44	2.02
Owner-Occupied Housing by Geography	1,090,468	6.20	21.39	29.46	42.08	0.86
Occupied Rental Units by Geography	793,580	22.73	30.60	22.94	20.41	3.32
Vacant Units by Geography	172,107	20.83	27.12	21.78	26.84	3.43
Businesses by Geography	302,802	10.25	21.08	23.70	42.86	2.12
Farms by Geography	5,310	7.18	19.11	27.23	44.86	1.62
Family Distribution by Income Level	1,318,481	25.12	17.09	17.73	40.05	0.00
Household Distribution by Income Level	1,884,048	25.45	16.42	17.00	41.14	0.00
Unemployment rate (%)	6.09	7.91	7.16	5.84	4.80	6.16
Households Below Poverty Level (%)	13.24	30.59	17.90	9.29	5.53	20.50
Median Family Income (26420 - Houston-Pasadena-The Woodlands, TX MSA)	\$81,859	Median Housing Value		\$166,300		
Median Family Income (26420 - Houston-Pasadena-The Woodlands, TX MSA) for 2023	\$94,100	Median Gross Rent		\$1,148		
		Families Below Poverty Level		11.60		
FFIEC File - 2020 Census						
2023 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						

Assessment Area(s) - Harris-Fort Bend County 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,248	15.30	27.40	24.60	29.57	3.13
Population by Geography	5,553,924	12.05	25.87	27.31	33.08	1.68
Housing Units by Geography	2,056,155	12.92	25.76	26.39	32.90	2.02
Owner-Occupied Housing by Geography	1,090,468	5.62	21.44	29.38	42.70	0.86
Occupied Rental Units by Geography	793,580	21.53	31.21	23.25	20.69	3.32
Vacant Units by Geography	172,107	19.49	28.01	21.97	27.10	3.43
Businesses by Geography	283,703	9.18	21.60	25.57	41.83	1.81
Farms by Geography	5,323	7.04	20.01	29.53	42.10	1.32
Family Distribution by Income Level	1,318,481	24.82	17.03	17.64	40.50	0.00
Household Distribution by Income Level	1,884,048	25.23	16.34	17.01	41.42	0.00
Unemployment rate (%)	6.09	7.91	7.15	5.92	4.80	6.16
Households Below Poverty Level (%)	13.24	30.79	18.40	9.38	5.52	20.50
Median Family Income (26420 - Houston-Pasadena-The Woodlands, TX MSA)		\$81,128		Median Housing Value		\$166,300
Median Family Income (26420 - Houston-Pasadena-The Woodlands, TX MSA) for 2023		\$97,400		Median Gross Rent		\$1,148
				Families Below Poverty Level		11.60
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						

Scope of Evaluation in Texas

A full-scope review was completed for the Harris-Fort Bend County AA. The Live Oak County AA and Atascosa-Wilson-Bexar County AA will receive limited-scope reviews. Over the evaluation period, mortgage and commercial loans both accounted for similar levels of originations at 27 percent and 26 percent, respectively. By dollar volume, commercial loans accounted for a higher level of loans at 59 percent. Additionally, as of December 31, 2024, commercial loans accounted for 59 percent of the bank's loan portfolio followed by mortgage lending at 32 percent. Commercial loans make up the majority of STB's portfolio and were identified as a primary product and a need of the community. As such, additional weight was assigned to commercial loan performance for the lending test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas 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 Texas 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 Texas 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 overall geographic distribution of the bank's home mortgage loans was reasonable.

2022-2023

The geographic distribution of the bank's home mortgage loans was reasonable. The percentage of bank loans in low-income geographies was below both the percentage of owner-occupied housing units and aggregate lending in those geographies. The percentage of bank loans in moderate-income geographies was significantly below both the percentage of owner-occupied housing units and aggregate lending in these areas.

2024

The geographic distribution of the bank's home mortgage loans was poor. The bank originated no loans in low-income geographies. The percentage of bank loans in moderate-income geographies was well below the percentage of owner-occupied housing units in these geographies and was below aggregate lending in these geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Texas 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.

The overall geographic distribution of the bank's small loans to businesses was excellent.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of small businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of small businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of the bank's small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of small businesses located in those geographies and the aggregate percentage of all

reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of small businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We reviewed geographic distribution reports for home mortgage loans and small loans to businesses in the AA and did not identify any unexplained conspicuous gaps in lending activity.

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 Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of the bank's home mortgage loans was poor. As noted in the description of the Harris-Fort Bend County AA, affordability of homes in the AA is a large limiting factor in the bank's ability to originate mortgages to low- and moderate-income borrowers.

2022-2023

The borrower distribution of the bank's home mortgage loans was poor. The bank originated zero home mortgage loans to low-income borrowers. The percentage of bank loans to moderate-income borrowers was significantly below the percentage of moderate-income families and was well below aggregate lending to these families.

2024

The borrower distribution of the bank's home mortgage loans was poor. The bank originated zero home mortgage loans to low-income borrowers. The percentage of bank loans to moderate-income borrowers was significantly below the percentage of moderate-income families and was well below aggregate lending to these families.

Small Loans to Businesses

Refer to Table 10 in the state of Texas 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 overall borrower distribution of the bank's small loans to small businesses was excellent.

2022-2023

The borrower distribution of small loans to small businesses was excellent. The percentage of small loans to businesses was below the percentage of businesses with annual revenues of \$1 million or less in

the AA and exceeded the percentage of aggregate lending to these businesses reported by business lenders in the AA.

2024

The borrower distribution of small loans to small businesses was excellent. The percentage of small loans to businesses was near-to the percentage of businesses with annual revenues of \$1 million or less in the AA and exceeded the percentage of aggregate lending to these businesses reported by business lenders in the AA.

Responses to Complaints

The bank did not receive any complaints related to its CRA or fair lending performance during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Live Oak County and Atascosa-Wilson-Bexar County AAs is consistent with the bank’s overall performance under the Lending Test in the full scope area.

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the Community Development Test in the State of Texas is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope and limited-scope reviews, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AAs.

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 \$
Harris-Fort Bend County AA	2	40.00	4,187	90.30
Live Oak County AA	0	0.00	0	0.00
Atascosa-Wilson-Bexar County AA	3	60.00	450	9.70
Total CD Loans	5	100.00	4,637	100.00

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

- One loan totaling \$2.6 million to revitalize a shopping center in a low-income CT in the Harris-Fort Bend County AA
- One loan totaling \$1.5 million to fund purchase of an apartment complex for affordable housing in the Harris County AA.
- Three loans totaling \$450 thousand to PeopleFund, a Community Development Financial Institution which provides small business loans and business assistance and education to people with limited access to such resources.

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)
Harris-Fort Bend County AA	0	0	6	150	6	100.00	150	100.00	0	0
Live Oak County AA	0	0	0	0	0	0.00	0	0.00	0	0
Atascosa-Wilson-Bexar County AA	0	0	0	0	0	0.00	0	0.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0.00	0	0.00	0	0
Total	0	0	6	150	6	100.00	150	100.00	0	0

The following are examples of qualified investments in the AA:

- The bank maintains certificates of deposits at two minority owned financial institutions in the Harris-Fort Bend County AA totaling \$150,000 in qualified investments.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank officers and staff provided 702 hours to 5 organizations that provide CD services in the AA. Activities included providing leadership and technical expertise through board and committee membership and providing financial education to LMI individuals. Notable organizations include:

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

- 639 combined hours serving as board members and bookkeeper for the Northshore Rotary Club – an organization of professionals who provide numerous projects and community services including maternal and child health, veteran support, and youth support and education.
- 20 Hours Board Member of the Texas Bankers Association Foundation – the foundation provides financial literacy and promotes consumer education

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Live Oak County AA is not consistent with the bank's overall performance under the CD Test in the full scope area. Performance in the Atascosa-Wilson-Bexar County AA is consistent with the bank's overall performance under the CD Test in the full scope area.

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:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage and small business loans. Community development loans, qualified investments, and community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State – Texas		
Harris-Fort Bend County AA	Full-Scope	All of Harris and Ford Bend Counties.
Live Oak County AA	Limited-Scope	All of Live Oak County.
Atascosa-Wilson-Bexar County AA	Limited-Scope	The AA includes all of Atascosa, Wilson, and eight CTs in Bexar County (1513.01, 1513.02, 1514, 1516, 1517, 1922, 1519, and 1520)

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Southtrust Bank, NA	Satisfactory	Satisfactory	Satisfactory
State:			
Texas	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 the 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 low- and moderate-income 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): 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** - Compares 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 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 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-,

middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
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		
Harris-Fort Bend County 2023	80	25,028	100.00	221,051	6.20	3.75	4.51	21.39	3.75	16.09	29.46	10.00	31.05	42.08	81.25	47.47	0.86	1.25	0.85		
Total	80	25,028	100.00	221,051	6.20	3.75	4.51	21.39	3.75	16.09	29.46	10.00	31.05	42.08	81.25	47.47	0.86	1.25	0.85		

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			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		
Harris-Fort Bend County	24	12,948	100.00	98,303	5.62	--	4.67	21.44	8.33	16.08	29.38	20.83	32.99	42.70	70.83	45.33	0.86	--	0.89		
Total	24	12,948	100.00	98,303	5.62	--	4.67	21.44	8.33	16.08	29.38	20.83	32.99	42.70	70.83	45.33	0.86	--	0.89		

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

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
Atascosa-Wilson-Bexar County	7	1,682	53.85	11,603	--	--	--	37.59	28.57	38.58	32.20	28.57	31.55	30.21	42.86	29.86	--	--	--
Live Oak County	6	1,440	46.15	484	--	--	--	14.73	16.67	12.19	50.60	83.33	57.44	34.66	--	30.37	--	--	--
Total	13	3,122	100.00	12,087	--	--	--	35.65	23.08	37.53	33.76	53.85	32.59	30.59	23.08	29.88	--	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 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 - 2023**

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
Harris-Fort Bend County 2023	80	25,028	100.00	221,051	25.12	--	3.97	17.09	3.75	14.18	17.73	3.75	19.80	40.05	90.00	40.56	--	2.50	21.50
Total	80	25,028	100.00	221,051	25.12	--	3.97	17.09	3.75	14.18	17.73	3.75	19.80	40.05	90.00	40.56	--	2.50	21.50

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 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 **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
Harris-Fort Bend County	24	12,948	100.00	98,303	24.82	--	3.74	17.03	4.17	12.64	17.64	8.33	18.90	40.50	83.33	39.61	--	4.17	25.10
Total	24	12,948	100.00	98,303	24.82	--	3.74	17.03	4.17	12.64	17.64	8.33	18.90	40.50	83.33	39.61	--	4.17	25.10

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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
Atascosa-Wilson-Bexar County	7	1,682	53.85	11,603	23.32	--	3.79	18.88	28.57	16.44	18.90	--	21.43	38.90	42.86	30.91	--	28.57	27.43
Live Oak County	6	1,440	46.15	484	24.72	--	4.13	16.56	--	11.78	15.25	16.67	16.74	43.46	83.33	48.35	--	--	19.01
Total	13	3,122	100.00	12,087	23.42	--	3.81	18.72	15.38	16.25	18.64	7.69	21.24	39.22	61.54	31.61	--	15.38	27.10

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000's)	% 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
Harris-Fort Bend County 2023	41	27,656	100.00	361,901	10.25	26.83	8.93	21.08	26.83	19.72	23.70	19.51	24.70	42.86	26.83	45.07	2.12	--	1.57
Total	41	27,656	100.00	361,901	10.25	26.83	8.93	21.08	26.83	19.72	23.70	19.51	24.70	42.86	26.83	45.07	2.12	--	1.57

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000's)	% 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
Harris-Fort Bend County	20	21,824	100.00	192,648	9.18	10.00	7.53	21.60	50.00	19.30	25.57	20.00	24.34	41.83	20.00	47.34	1.81	--	1.49
Total	20	21,824	100.00	192,648	9.18	10.00	7.53	21.60	50.00	19.30	25.57	20.00	24.34	41.83	20.00	47.34	1.81	--	1.49

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA 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			
	#	\$(000's)	% 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
Atascosa-Wilson-Bexar County	30	3,682	50.00	6,308	--	--	--	38.22	43.33	36.59	32.56	40.0	33.61	29.22	16.67	29.80	--	--	--
Live Oak County	30	1,249	50.00	646	--	--	--	17.75	26.67	15.48	65.25	70.0	58.51	17.00	3.33	26.01	--	--	--
Total	60	4,931	100.00	6,954	--	--	--	36.29	35.00	34.63	35.65	55.00	35.92	28.06	10.00	29.45	--	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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 - 2023**

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
Harris-Fort Bend County 2023	41	27,656	100.00	361,901	89.32	56.10	51.61	3.65	43.90	7.03	--
Total	41	27,656	100.00	361,901	89.32	56.10	51.61	3.65	43.90	7.03	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 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 **2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000's)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Harris-Fort Bend County	20	21,824	100.00	192,648	88.88	80.00	52.80	3.45	20.00	7.67	--
Total	20	21,824	100.00	192,648	88.88	80.00	52.80	3.45	20.00	7.67	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 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
Atascosa-Wilson-Bexar County	30	3,682	50.00	6,308	84.62	76.67	48.11	2.85	23.33	12.53	--
Live Oak County	30	1,249	50.00	646	82.50	96.67	46.13	3.00	3.33	14.50	--
Total	60	4,931	100.00	6,954	84.42	86.67	47.93	2.86	13.33	12.72	--

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