



PUBLIC DISCLOSURE

February 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ozarks Federal Savings and Loan Association
Charter Number 701283

2 E. Columbia Street
Farmington, MO 63640

Office of the Comptroller of the Currency

500 N Broadway St. Suite 1700
St. Louis, MO 63102

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Lending Test rating is based on the Ozarks Federal Savings and Loan Association's (FSA) performance in the state of Missouri. The major factors that support this rating include:

- The FSAs average loan-to-deposit (LTD) ratio is more than reasonable given the size, financial condition, level of local competition, and credit needs of the assessment areas (AA).
- A majority of the FSAs loans are originated within the AAs.
- The distribution of loans to borrowers across geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- The FSA did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the FSAs size, financial condition, and credit needs of the AAs, the LTD ratio is more than reasonable. The average LTD ratio over the 15 quarters since the last CRA exam is 94.4 percent. Over this period, the LTD ratio ranged from a low of 81.7 percent to a high of 102.3 percent.

To assess the FSAs performance, we analyzed the LTD ratio of comparable institutions. We used a peer group of four institutions of comparable asset size, location, and lending opportunity. Over the evaluation period, the average LTD ratio for the comparable institutions was 84.9 percent. The FSA ranked second out of five when comparing average LTD. See table below for further detail.

Institution	Total Assets \$(000s) as of December 31, 2021	Average Quarterly LTD Ratio
Fortune Bank	\$260,509	99.9%
Ozarks Federal Savings and Loan Association	\$244,139	94.4%
Belgrade State Bank	\$361,604	84.5%
Unico Bank	\$424,329	82.9%
New Era Bank	\$422,252	72.4%

Source: Quarterly Call Reports from January 1, 2018 to September 30, 2021

Lending in Assessment Area

The FSA originated a majority of its home mortgage loans inside its AAs. The FSA originated or purchased 89.1 percent by number and 85.5 percent by dollar volume of its total loans inside the AAs during the evaluation period. This analysis is performed at the FSA, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	332	91.7	30	8.3	362	51,850	87.2	7,619	12.8	59,469
2019	299	86.7	46	13.3	345	44,873	82.4	9,556	17.6	54,429
2020	379	88.8	48	11.2	427	67,829	86.4	10,681	13.6	78,510
Subtotal	1,010	89.1	124	10.9	1,134	164,552	85.5	27,856	14.5	192,408

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

FSA is an intrastate savings and loan association headquartered in Farmington, Missouri. The FSA operates as a mutual association and considers all holders of deposit accounts and other authorized accounts as members. No affiliates or subsidiary activities of the FSA were considered in this evaluation.

The FSA maintains four full-service branches in addition to the main location, which all offer a wide range of banking products to its customers. These include traditional deposit and loan products. Deposit services include a variety of checking, savings, and money market products for consumer and small business customers, as well as offering certificates of deposit and IRA savings accounts. Lending services include home mortgage loans, construction loans, home equity loans, home equity lines of credit, and medical professional loans. Other services offered include automated teller machine (ATM)/debit cards, internet banking (including bill pay), mobile banking, and wire transfers. Since the last performance evaluation, the FSA has not opened or closed any branches and there have been no major changes in FSAs corporate structure, including merger or acquisition activities.

As of December 31, 2021, the FSA had total assets of \$244 million, total deposits of \$196 million, and common equity tier 1 capital of \$39 million or 24.6 percent of total risk-weighted assets. The FSAs total loans and leases were \$165 million or 67.5 percent of total assets. Loan portfolio composition includes the following:

Loan Type	Dollars \$(000s)	Percentage of Loan Portfolio
Residential Loans	\$164,523	88.6%
Commercial Loans	\$20,817	11.2%
Consumer Loans	\$310	<1%
Agricultural Loans	\$0	0%
Total Loans	\$185,650	100%
<i>Source: 12/31/2021 Call Report</i>		

The FSAs primary business strategy is to concentrate on residential real estate, commensurate with a traditional savings and loan association. The loan portfolio is almost exclusively comprised of residential real estate loans. There are no legal, financial, or other factors impeding the FSAs ability to help meet the credit needs in its AAs. The FSA received a “Satisfactory” rating at their last CRA performance evaluation dated February 18, 2019.

For CRA purposes, the FSA has identified two AAs in the state of Missouri: a Missouri Non-MSA AA and the St. Louis MO-IL Metropolitan Statistical Area (MSA) #41180 (St. Louis MSA) AA. Each AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income (LMI) geographies.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of the FSA under the Small Bank performance criteria, which consists of the Lending Test. This test evaluates the FSAs record of meeting the credit needs of its assessment areas through lending activities. The evaluation period for the Lending Test is January 1, 2018 through December 31, 2020.

Based on our review of all loans originated and purchased from January 1, 2018 through December 31, 2020, we determined the FSAs primary loan product for both the Missouri Non-MSA AA and the St. Louis MSA AA to be home mortgage loans. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

Loan Originations/Purchases by Loan Type from January 1, 2018 to December 31, 2020				
Loan Category	Number of Loans	% of Number of Loans	Dollars \$(000s)	% of Dollars
Consumer Loans	16	1.6%	\$320	0.30%
Business Loans	125	12.8%	\$18,370	17.2%
Farm Loans	0	0%	\$0	0%
Home Loans	836	85.6%	\$88,183	82.5%
Total	977	100%	\$106,873	100%
<i>Source: Bank Records January 1, 2018- December 31, 2020</i>				
<i>Due to rounding, totals may not equal 100%</i>				

Examiners relied on Home Mortgage Disclosure Act (HMDA) data to complete an analysis of home mortgage loans. Home mortgage loans originated or purchased during the evaluation period were compared to 2015 American Community Survey (ACS) U.S. Census and 2020 CRA aggregate peer data.

In December 2021, we tested the accuracy of the FSAs HMDA data as reported on the Loan Application Register. We concluded that the FSAs HMDA data is reliable as a source for analysis and conclusions set forth in this CRA performance evaluation.

Selection of Areas for Full-Scope Review

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

Ratings

The FSAs overall rating is based solely on its performance in the state of Missouri. The state of Missouri rating is derived from the FSAs performance under the CRA Small Bank Lending Test as well as related performance context information from the FSAs AA. Except for the FSAs LTD ratio (based on the FSAs entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the FSAs lending performance in relation to its primary product of home mortgage loans for both the Missouri Non-MSA AA and St. Louis MSA AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Missouri

CRA rating for the State of Missouri: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- The FSA did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Missouri

The FSA has two AAs located in Missouri: the Missouri Non-MSA AA and the St. Louis MSA AA.

Missouri Non-MSA

The Missouri Non-MSA AA includes the FSAs primary market area of Madison, Iron, St. Francois, and Washington counties, all located in southeastern Missouri. The AA includes 23 census tracts (CTs), with no low-income CTs, three moderate-income CTs, 19 middle-income CTs, and 1 upper-income CT. Within the Missouri Non-MSA, the FSA operates the main office in Farmington and one branch in each of the following towns: Fredericktown, Ironton, and Potosi. Each branch and the main office have a deposit-taking ATM.

Competition:

Competition for deposits in the AA is high. As of June 30, 2020, the FSA reported \$158 million in deposits in the AA. This represents 72.7 percent of the FSAs total deposits as of that date. According to Federal Deposit Insurance Corporation (FDIC) market share information, the FSA ranked fourth in deposit market share in the AA with 8.2 percent. The AA has a total of eight FDIC-insured deposit-taking institutions operating 46 branches. Institutions with the three highest deposit market shares include First State Community Bank with 39.6 percent, New Era Bank with 20.2 percent, and Belgrade State Bank with 15 percent. Competitors in the AA include local community banks, credit unions, small regional banks, and one large national bank (U.S. Bank).

Market competition for home mortgage loans is high within the AA. According to the 2020 Peer Mortgage Market Share Data, the FSA competed with 145 other lenders, ranking third with 265 home mortgages originated or purchased or 7.3 percent of the market share. First State Community Bank and Guild Mortgage Company lead with 20.9 percent and 17.8 percent, respectively.

Demographics

The following table provides a summary of the demographics, including housing and family information, for the Missouri Non-MSA AA.

Demographic Information of the Assessment Area						
Assessment Area: Missouri Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	13.0	82.6	4.3	0.0
Population by Geography	113,781	0.0	14.0	83.8	2.2	0.0
Housing Units by Geography	51,323	0.0	15.1	82.5	2.4	0.0
Owner-Occupied Units by Geography	30,025	0.0	14.9	82.9	2.2	0.0
Occupied Rental Units by Geography	12,589	0.0	16.5	80.1	3.5	0.0
Vacant Units by Geography	8,709	0.0	13.8	84.8	1.4	0.0
Businesses by Geography	5,915	0.0	12.2	84.5	3.3	0.0
Farms by Geography	246	0.0	8.1	90.2	1.6	0.0
Family Distribution by Income Level	28,407	21.9	18.4	22.7	37.0	0.0
Household Distribution by Income Level	42,614	24.2	16.8	19.0	39.9	0.0
Median Family Income Non-MSAs - MO		\$48,341	Median Housing Value			\$96,682
			Median Gross Rent			\$583
			Families Below Poverty Level			14.5%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Family Distribution by Income Level

According to the 2015 ACS Census data, there were 28,407 families in the AA. Approximately 6,232 (21.9 percent) of those families were low-income families, 5,237 (18.4 percent) were moderate-income families, 6,441 (22.7 percent) were middle-income families, and 10,497 (37 percent) were upper-income families. There were 14.5 percent of families living below the poverty level.

Housing Characteristics and Home Affordability

The 2015 ACS Census data reported 51,323 total housing units in the AA. Of these housing unit, 30,025 (58.5 percent) were owner occupied, 12,589 (24.5 percent) were occupied rental units, and 8,709 (17 percent) were vacant. The median age of housing stock is 43 years. Aging homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are characteristically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals. The median housing value for Missouri Non-MSA AA was \$96,682 in 2020.

Based on information in the table below, low-income families earned less than \$26,550 (2018) and up to \$27,200 (2020), and moderate-income families earned from \$26,550 (2018) to \$43,520 (2020).

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
MO NA Median Family Income (99999)				
2018 (\$53,100)	<\$26,550	\$26,550 to <\$42,480	\$42,480 to <\$63,720	≥\$63,720
2019 (\$52,400)	<\$26,200	\$26,200 to <\$41,920	\$41,920 to <\$62,880	≥\$62,880
2020 (\$54,400)	<\$27,200	\$27,200 to <\$43,520	\$43,520 to <\$65,280	≥\$65,280

Source: FFIEC

Employment Factors and Economic Conditions

According to the Bureau of Labor Statistics (BLS), the unemployment rates for the Missouri Non-MSA AA, the State of Missouri, and nationally were stable or improving year over year but increased significantly as a result of the COVID-19 pandemic in 2020. Iron and Washington counties have typically seen higher unemployment rates compared to other counties in the AA. The table below displays the annual average unemployment rates for all counties in the AA, the State of Missouri, and nationally.

Annual Unemployment Rates			
Area	2018	2019	2020
Iron County	5.4%	4.8%	7.0%
Jefferson County	3.1%	3.1%	6.1%
Madison County	3.5%	3.4%	6.5%
St. Francois County	3.7%	3.7%	7.0%
Washington County	4.5%	4.5%	7.2%
State of Missouri	4.4%	4.0%	9.5%
National	3.9%	3.7%	8.1%

Source: US Department of Labor; Bureau of Labor Statistic. Rates are not seasonally adjusted.

Community Contacts

We contacted a community development agency during this examination. Our contact identified the primary needs of the AA is more reliable sources of funding for projects such as housing for low-income and mentally ill populations, as well as technical education and certificate programs to provide unemployed workers with marketable skills.

St. Louis MSA

The St. Louis MSA AA includes all of Jefferson County. The FSAs sole branch in the St. Louis MSA AA is located in Festus, Missouri and includes one deposit-taking ATM. The AA includes 42 CTs, of which none are low income, 12 are middle income, 26 are moderate income, and four are upper income.

Competition

Competition for deposits in the AA is high. As of June 30, 2020, the FSA reported \$59 million in deposits in the AA representing 27.3 percent of the FSAs total deposits as of that date. According to the FDIC market share information, the FSA ranked 14th in deposit market share in the AA at 1.9 percent. The AA has a total of 22 FDIC-insured deposit-taking institutions operating 45 branches. Competitors in the AA include local community banks, credit unions, small regional banks, two large regional banks (Commerce Bank and UMB Bank), and five large banks (Bank of America, U.S. Bank, PNC Bank,

BMO Harris Bank, and Regions Bank). Enterprise Bank & Trust held the highest market share with 14.3 percent, closely followed by Midwest Regional Bank with 13.3 percent.

Market competition for home mortgage loans is high within the AA. According to the 2020 Peer Mortgage Market Share Data, the FSA competed with 251 other lenders ranking 38th. The FSA has 0.7 percent of the market share based on number of mortgage loans and 0.86 percent of market share based on dollar volume of loans. Based on the number of mortgage loans, the Guild Mortgage Company, DAS Acquisition Company, LLC, and Wells Fargo, N.A. are the top three lenders with 8.2 percent, 6 percent, and 5.1 percent of market share, respectively.

Demographics

The following table provides a summary of the demographics, including housing and family information, for the St. Louis MSA AA.

Demographic Information of the Assessment Area						
Assessment Area: St. Louis MSA – Jefferson County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	28.6	61.9	9.5	0.0
Population by Geography	221,577	0.0	26.6	64.5	8.8	0.0
Housing Units by Geography	88,584	0.0	27.3	64.2	8.4	0.0
Owner-Occupied Units by Geography	66,417	0.0	25.0	66.3	8.7	0.0
Occupied Rental Units by Geography	15,573	0.0	36.8	55.8	7.4	0.0
Vacant Units by Geography	6,594	0.0	28.5	63.2	8.3	0.0
Businesses by Geography	11,779	0.0	27.1	65.1	7.8	0.0
Farms by Geography	505	0.0	24.2	65.0	10.9	0.0
Family Distribution by Income Level	59,813	20.8	21.2	23.6	34.5	0.0
Household Distribution by Income Level	81,990	20.2	17.5	21.1	41.2	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$150,418
			Median Gross Rent			\$797
			Families Below Poverty Level			8.2%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Family Distribution by Income Level

According to the 2015 ACS Census data, there were 59,813 families in the St. Louis MSA AA. Approximately 12,439 (20.8 percent) of those families were low-income families, 12,655 (21.2 percent) were moderate-income families, 14,110 (23.6 percent) were middle-income families, and 20,609 (34.5 percent) were upper-income families. The percentage of families living below the poverty level was 8.2 percent.

Housing Characteristics and Home Affordability

The 2015 ACS Census data reported 88,584 total housing units in the St. Louis MSA. Of these housing units, 66,417 (75 percent) were owner-occupied, 15,573 (17.6 percent) were occupied rental units, and 6,594 (7.4 percent) were vacant. The median age of housing stock is 36 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals.

Based on information in the table below, low-income families earned less than \$38,300 (2018) and up to \$41,300 (2020), and moderate-income families earned from \$38,300 (2018) to \$66,080 (2020).

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
St. Louis, MO-IL MSA Median Family Income (41180)				
2018 (\$76,600)	<\$38,300	\$38,300 to <\$61,280	\$61,280 to <\$91,920	≥\$91,920
2019 (\$81,200)	<\$40,600	\$40,600 to <\$64,960	\$64,960 to <\$97,440	≥\$97,440
2020 (\$82,600)	<\$41,300	\$41,300 to <\$66,080	\$66,080 to <\$99,120	≥\$99,120

Employment Factors and Economic Conditions

According to the BLS, the unemployment rates for Jefferson County, the State of Missouri, and nationally were stable or improving year over year but increased significantly as a result of the COVID-19 pandemic in 2020. Both Jefferson County and the State of Missouri were below national annual unemployment rates for all years.

Annual Unemployment Rates			
Area	2018	2019	2020
Jefferson County	3.1%	3.1%	6.1%
State of Missouri	3.2%	3.3%	6.1%
National	3.9%	3.7%	8.1%

Source: US Department of Labor; Bureau of Labor Statistic. Rates are not seasonally adjusted.

Community Contacts

We contacted a community action agency during this examination. Our contact identified the primary needs of the AA to be mitigating the effects of past policies that promoted inequality, such as redlining and disinvestment, as well as increasing funding for play spaces (public recreation areas) in LMI neighborhoods.

Scope of Evaluation in Missouri

The FSAs Missouri Non-MSA AA and St. Louis MSA AA each received a full-scope review.

LENDING TEST

The FSAs performance under the Lending Test in Missouri is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the FSAs performance in both AAs is adequate.

Distribution of Loans by Income Level of the Geography

The FSA exhibits a reasonable geographic distribution of loans in the state of Missouri.

Home Mortgage Loans

Refer to Table O in the state of Missouri section of Appendix D for the facts and data used to evaluate the geographic distribution of the FSAs home mortgage loan originations and purchases.

Missouri Non-MSA

The geographic distribution of home mortgage loans in this AA is reasonable. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units, and below the aggregate percentage of all reporting lenders. There are no now-income CTs in this AA.

St. Louis MSA

The geographic distribution of home mortgage loans in this AA is excellent. The percentage of home mortgage loans originated or purchased in moderate-income geographies far exceeded the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed the FSAs home mortgage lending originations and purchases over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous lending gaps in the AAs.

Distribution of Loans by Income Level of the Borrower

The FSA exhibits a reasonable distribution of loans to individuals of different income levels in the state of Missouri.

Home Mortgage Loans

Refer to Table P in the state of Missouri section of Appendix D for the facts and data used to evaluate the borrower distribution of the FSAs home mortgage loan originations and purchases.

Missouri Non-MSA

The distribution of home mortgage loans among individuals of different income levels in this AA is reasonable. The percentage of home mortgage loans originated or purchased to LMI borrowers was well below the percentage of LMI families but exceeded the aggregate percentage of all reporting lenders.

St. Louis MSA

The distribution of home mortgage loans among individuals of different income levels in this AA is reasonable. The percentage of home mortgage loans originated or purchased to LMI borrowers was well below the percentage of LMI families and the aggregate percentage of all reporting lenders. The significant level of competition was factored into the FSAs performance.

Responses to Complaints

No CRA-related complaints have been received by the FSA or the OCC since the prior CRA evaluation.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Missouri		
Missouri Non-MSA	Full Scope	Madison, Iron, St. Francois, and Washington counties
St. Louis MSA	Full Scope	Jefferson County

Appendix B: Summary of MMSA and State Ratings

RATINGS: Ozarks Federal Savings and Loan Association	
Overall Bank:	Lending Test Rating
Ozarks Federal Savings and Loan Association	Satisfactory
MMSA or State:	
Missouri	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% Of Total	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	
2020 - MSA Jefferson County	283	62,393	28.0	16,279	0.0	0.0	0.0	25.0	37.1	20.1	66.3	58.0	68.3	8.7	4.9	11.6	0.0	0.0	0.0	
2020 - Non MSA	727	102,159	72.0	3,628	0.0	0.0	0.0	14.9	11.4	12.8	82.9	83.9	84.6	2.2	4.7	2.5	0.0	0.0	0.0	
Total	1,010	164,552	100.0	19,907	0.0	0.0	0.0	21.9	18.6	18.7	71.5	76.6	71.3	6.7	4.8	10.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018-20
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% Of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
2020 - MSA Jefferson County	283	62,393	28.0	16,279	20.8	5.3	9.0	21.2	15.2	21.2	23.6	21.6	22.3	34.5	54.4	26.0	0.0	3.5	21.4	
2020 - Non MSA	727	102,159	72.0	3,628	21.9	5.5	5.2	18.4	13.8	12.8	22.7	19.9	20.8	37.0	55.0	39.9	0.0	5.8	21.4	
Total	1,010	164,552	100.0	19,907	21.2	5.4	8.3	20.3	14.2	19.7	23.3	20.4	22.0	35.3	54.9	28.5	0.0	5.1	21.4	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%