



PUBLIC DISCLOSURE

August 8, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust Company
Charter Number 1926

2 Kelli Court
Clinton, Illinois 61727

Office of the Comptroller of the Currency

Downers Grove Office
2001 Butterfield Road, Suite 400
Downers Grove, IL 60515

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The Lending Test rating is based on First National Bank and Trust Company’s (FNBTC or bank) satisfactory performance in the State of Illinois. The major factors that support this rating include:

- FNBTC’s distribution of loans to individuals of different income levels and businesses of different sizes within the assessment area (AA) is excellent.
- FNBTC’s loan-to deposit ratio is less than reasonable.
- A majority of home mortgage and business loans were originated within the AA.

Loan-to-Deposit Ratio

Considering FNBTC’s size, financial condition, and credit needs of the AA, the bank’s loan-to-deposit ratio is less than reasonable. FNBTC’s quarterly loan-to-deposit ratio averaged 17.9 percent over the 11-quarter period ending December 31, 2021. Over this period, the bank’s quarterly loan-to-deposit ratio ranged from a low of 13.7 percent to a high of 31.7 percent. The low loan-to-deposit ratio is reflective of the bank’s primary business strategy which is focused on the investment portfolio to generate earnings.

We analyzed the quarterly loan-to-deposit ratios of eight similarly situated federal and state banks based on a combination of size, location, and lending opportunities. The banks ranged in size from \$123 million to \$715 million and were headquartered in and around the AA including De Witt, Ford, Macon, McLean, and Piatt Counties. The combined average quarterly loan-to-deposit ratio for the similarly situated banks was 65.2 percent over the same evaluation period. FNBTC’s total assets are the second highest in this group, and the loan-to-deposit ratio is the lowest.

Lending in Assessment Area

A majority of the bank’s loans are inside its AA. The bank originated and purchased 72.5 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
|--------------------|-----------------|-------------|-----------|-------------|-----------|---------------------------------|-------------|--------------|-------------|----------------|
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage Loan | 17 | 85 | 3 | 15 | 20 | 2,654 | 83.9 | 510 | 16.1 | 3,163 |
| Business Loans | 12 | 60 | 8 | 40 | 20 | 817 | 20.9 | 3,085 | 79.1 | 3,902 |
| Total | 29 | 72.5 | 11 | 27.5 | 40 | 3,471 | 49.1 | 3,595 | 50.9 | 7,066 |

Source: Evaluation Period 1/1/2019-12/31/2021 Bank Data, Sample of 20 Home Mortgage Loans and 20 Business Loans

Description of Institution

FNBTC is a \$421.1 million intrastate financial institution headquartered in Clinton, Illinois (IL). FNBTC is a full-service banking institution with one location in IL. FNBTC is wholly owned subsidiary of TS Contrarian Bancshares Inc. (TSCBI) in Treynor, Iowa (IA). TSCBI is owned by GGC, LLP, located in Council Bluffs, IA, and Treynor Bancshares Inc. (TBI), which is headquartered in Treynor, IA. Other affiliates include The Bank of Tioga in North Dakota, owned by TSCBI, TS Bank (TSB) in IA, owned by TBI, Treynor Statutory Trust I, owned by TBI, and Treynor Tomorrows Inc, owned by TSB. Other non-bank affiliates include Collins Consulting Inc., TSB Community Foundation, Heidi Gutttau-Fox and Joshua Gutttau Irrevocable Living Trust, Gutttau Land Co, LLC, Gutttau Land Co I, LLC, Peters Personnel Inc., Timber Stream Cattle Co LLC, and TS Capital LLC.

On October 1, 2021, TSCBI acquired the State Bank of Arcadia in Arcadia, Wisconsin (WI) and merged it with FNBTC. FNBTC has two AAs, including De Witt County in IL and Trempealeau County in WI; both AAs are in nonmetropolitan statistical areas (Non-MSA). As there was less than six months lending activity for analysis during the evaluation period, the WI AA is not included in this evaluation.

In the IL AA, the bank has two ATMs. One non-deposit taking ATM is located at the bank's headquarters, and a separate drive-up non-deposit taking ATM is located at 604 S. Quincy Street in Clinton. The Quincy Street ATM was relocated from 400 West Jefferson Street in December 2019, and the old drive-up facility was sold. In addition to its branch network, FNBTC's delivery channels include digital banking, mobile banking, and telephone banking. FNBTC offers conventional deposit and loan products, and asset management services. The bank also referred some applicants for long-term fixed-rate home loans to a third-party mortgage company during the evaluation period.

As of December 31, 2021, the bank's loan portfolio totaled \$119.8 million, or 28.4 percent of total assets. Tier 1 capital was \$29.5 million. The following table represents the loan portfolio mix:

| Loan Portfolio Summary by Loan Product | |
|--|---------------------------------|
| Loan Category | % of Outstanding Dollars |
| Home Mortgage Loans | 38.8 |
| Business Loans, including Commercial Real Estate | 32.0 |
| Farm Loans, including Farmland | 27.2 |
| Consumer Loans | 2.0 |

Source: Uniform Bank Performance Report as of December 31, 2021.

FNBTC's business strategy is focused on the investment portfolio, which represents 55.4 percent of total assets on December 31, 2021. The bank's lending strategy is to meet the financial needs of the community it serves with an emphasis on small business and home mortgage lending. There are no known financial impediments limiting the bank's ability to help meet the credit needs of its local community, including low- and moderate-income families and neighborhoods. At the previous CRA evaluation dated June 10, 2019, FNBTC received a "Satisfactory" rating under the small bank evaluation procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation addresses FNBTC's CRA performance from January 1, 2019, through December 31, 2021. We evaluated FNBTC's CRA performance using Interagency Small Bank examination procedures, which evaluates the bank's record of meeting the credit needs of its AA through lending activities.

Based on our review of loan origination data, FNBTC's primary lending products were small business and home mortgage loans. Small business loans represent 37.8 percent of the number and 58.1 percent of the dollar volume of loan originations for 2019, 2020, and 2021. Home mortgage loans represent 23.6 percent of the number and 18.2 percent of the dollar volume of originations for the same period. We sampled 20 business loans and 20 home mortgage loans for this evaluation.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census, 2021 Dun and Bradstreet (D&B) Data, and 2020 CRA Aggregate Data. No affiliate activity was included in this analysis. Refer to the table in Appendix A for more information on the scope of the review.

Bank management requested that the analysis consider community development activities as part of this evaluation.

Selection of Areas for Full-Scope Review

FNBTC has one AA in the State of Illinois, and we completed a full-scope review of that AA. A community profile for the AA is provided in the "Scope" section in the State of Illinois portion of this evaluation.

Ratings

FNBTC's overall rating is based on the full-scope review of the AA in the State of Illinois. The analysis placed more weight on the distribution of income criterion, as there are no low- or moderate- income census tracts (CTs) in the AA. The percentage of low- and moderate-income families in the AA is 46.2 percent.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- FNBTC's distribution of loans to individuals of different income levels and businesses of different sizes within the AA is excellent
- FNBTC's loan-to deposit ratio is less than reasonable.
- A majority of home mortgage and business loans were originated within the AA.

Description of Institution's Operations in Illinois

FNBTC has one AA within the State of Illinois. The AA consists of the entirety of De Witt County. The bank operates one branch in Clinton, IL, the county seat of De Witt County. Clinton is located in central Illinois and is bedroom community for the cities of Decatur (22 miles south) and Bloomington (27 miles north). There are no low or moderate income CTs in the AA. There were no branch openings or closings during the evaluation period. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies.

Competition

Competition in the AA comes from two FDIC-insured deposit institutions. According to the June 30, 2021 FDIC Deposit Market Share Report, FNBTC's deposits in the AA totaled \$186.4 million. The bank ranked first out of three institutions in the AA with a deposit market share of 40.1 percent. The other depository institutions with branches in the AA include Heartland Bank Trust Company, which is significantly larger in total assets, with a deposit market share of 39.5 percent and De Witt Savings Bank, which is significantly smaller in total assets, with a deposit market share of 20.4 percent.

Demographics

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: De Witt County | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 5 | 0.0 | 0.0 | 60.0 | 40.0 | 0.0 |
| Population by Geography | 16,388 | 0.0 | 0.0 | 59.5 | 40.5 | 0.0 |
| Housing Units by Geography | 7,522 | 0.0 | 0.0 | 60.9 | 39.1 | 0.0 |
| Owner-Occupied Units by Geography | 5,359 | 0.0 | 0.0 | 55.9 | 44.1 | 0.0 |
| Occupied Rental Units by Geography | 1,481 | 0.0 | 0.0 | 82.0 | 18.0 | 0.0 |
| Vacant Units by Geography | 682 | 0.0 | 0.0 | 54.5 | 45.5 | 0.0 |
| Businesses by Geography | 899 | 0.0 | 0.0 | 67.6 | 32.4 | 0.0 |
| Farms by Geography | 115 | 0.0 | 0.0 | 48.7 | 51.3 | 0.0 |
| Family Distribution by Income Level | 4,481 | 21.2 | 25.0 | 26.4 | 27.4 | 0.0 |
| Household Distribution by Income Level | 6,840 | 27.6 | 16.8 | 19.8 | 35.8 | 0.0 |
| Median Family Income Non-MSAs - IL | | \$68,911 | Median Housing Value | | | \$106,747 |
| | | | Median Gross Rent | | | \$607 |
| | | | Families Below Poverty Level | | | 9.9% |
| <i>Source: 2015 ACS and 2021 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> | | | | | | |

Population

According to the 2015 ACS Census data, the area population was 16,388. There were 4,481 families in the AA, of which 951 (21.2 percent) are low-income; 1,120 (25.0 percent) are moderate-income; 1,183 (26.4 percent) are middle-income; and 1,227 (27.4 percent) are upper-income. Median family income was \$68,911. The percentage of families in the AA living below the poverty level is 9.9 percent.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment rates in the AA were gradually improving until the COVID-19 pandemic that began in March 2020. The unemployment rate in the AA has improved since the peak unemployment rate in April 2020 and was lower than the state and national average on December 31, 2021.

| Annual Unemployment Rates | | | | |
|--|-------------|-------------|-------------|-------------|
| Area | 2019 | 2020 | 2021 | Peak |
| De Witt County | 4.2% | 6.7% | 4.9% | 10.8% |
| State of Illinois | 4.0% | 9.2% | 6.1% | 17.2% |
| National | 3.7% | 8.1% | 5.5% | 14.7% |
| <i>Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of April 30, 2021.</i> | | | | |

Industries driving the local economy include agriculture, retail trade, manufacturing, and healthcare and social assistance. The largest employers in DeWitt County are Exelon Corporation, John Warner Hospital, Miller Container, HNC Products Inc., and De Witt County governments and school districts. Many residents commute to Bloomington and Decatur for employment.

Businesses in the AA include 76.5 percent small businesses with gross annual revenues of \$1 million or less, 4.7 percent businesses with gross annual revenues of over \$1 million, and 18.8 percent where businesses did not report revenue information.

Housing

According to the 2015 ACS Census, there are 7,522 housing units in the AA. Of the housing units, 71.2 percent are owner-occupied, 19.7 percent are rentals, and 9.1 percent are vacant. The median monthly gross rent is \$607. The median age of housing units in the AA is 60 years with a median value of \$106,747. 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 low- and moderate-income families.

Community Contact

We performed one community contact with an economic development organization. Identified credit needs include a need for small business revolving lines of credit and micro loans, more housing units (both rental and owner-occupied) in the county, financial education for small business owners, and donations supporting nonprofit community service and economic development organizations. The contact mentioned that the nonprofit community service organizations were particularly hit hard during the pandemic as they were unable to hold fund raising events, and demand for services increased. Demand for housing has increased as more people want to move out of larger cities to rural areas.

Scope of Evaluation in Illinois

FNBTC has one AA in the state of Illinois, and we completed a full-scope review of this AA.

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory. The bank's less than reasonable loan-to-deposit ratio had a negative impact on the overall rating. Community development activities had a neutral impact on the rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of Illinois is reasonable, considering all evaluation criteria, including the excellent income distribution analysis, less-than reasonable loan-to-deposit ratio, and adequate lending in the assessment area.

Distribution of Loans by Income Level of the Geography

No geographic distribution analysis was completed for this evaluation. The analysis would not be meaningful, as the AA has no low- or moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent 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 P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

FNBTC's distribution of home mortgage loans to individuals of different income levels in the AA is excellent. While the bank's percentage of loans to low-income borrowers was lower than the percentage of low-income families in the AA, it significantly exceeded the aggregate lending in the AA. The bank's lending to moderate-income borrowers matched the percentage of moderate-income families in the AA and exceeded the aggregate lending in the AA.

Small Loans to Businesses

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

FNBTC's distribution of loans to businesses of different sizes in the AA is excellent. The bank's percentage of loans to small businesses was near to the percentage of small businesses in the AA and significantly exceeded the aggregate lending in the AA. It is appropriate to note that 18.8 percent of businesses in the AA did not report revenue information, and it is likely that most of these are small businesses.

Responses to Complaints

FNBTC did not receive any complaints regarding its CRA performance during the evaluation period.

Community Development Activities

The bank's qualified community development loans and investments within the AA totaled \$1.5 million representing 5.1 percent of tier 1 capital. Bank employees also provided community development services through leadership roles at six nonprofit economic development and community service organizations and through providing financial literacy education at four elementary schools in the AA. Community development activities had a neutral impact on the evaluation.

- The bank originated 28 qualified Small Business Administration (SBA) guaranteed Paycheck Protection Program (PPP) loans totaling \$1.1 million to businesses and farms in the AA. The PPP was established under the 2020 Coronavirus Aid, Relief, and Economic Security (CARES) Act in response to the COVID-19 pandemic. PPP loans support economic development through the retention of jobs that would otherwise be lost due to business and farm closures as a result of the COVID-19 pandemic. PPP loans made in 2021 meet the definition of revitalizing and stabilizing designated federal disaster areas, which includes De Witt County under the 2021 Coronavirus

Response and Consolidated Appropriations Act. The bank originated another 14 qualified SBA guaranteed PPP loans totaling \$1.9 million outside the AA.

- The bank originated three loans totaling \$400,000 for affordable housing. Two loans for \$330,000 funded the acquisition of a 39-unit mobile home park and purchase of new mobile homes for rent. One loan was for a 7-unit apartment building. The rents for these properties are below the average monthly gross rent for the AA.
- The bank provided \$39,430 in donations to nonprofit economic development and community service organizations. Through a local economic development organization, the bank funded \$15,000 in business expansion grants to three small businesses that created two new jobs in the AA and provided retail space for 20 independent vendors, artists, and food entrepreneurs to operate.
- In 2021, the bank provided financial literacy education programs to four elementary schools in the AA.
- Seven bank employees, including one director and four officers, served in a leadership role as board members and officers at six qualified nonprofit economic development and community service organizations serving the AA.

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: | 1/1/2019-12/31/2021 | |
| Bank Products Reviewed: | Home mortgage, small business. | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | | |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| State of Illinois | | |
| De Witt County AA | Full-Scope | CTs: 9714, 9715, 9716, 9717, 9718 |
| | | |

Appendix B: Summary of MMSA and State Ratings

| RATINGS: First National Bank and Trust Company | |
|--|---------------------|
| Overall Bank: | Lending Test Rating |
| | |
| FNBTC | Satisfactory |
| State of Illinois | 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 of the area median income.

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 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 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2019-2021 | | |
|--|---------------------------|---------------------|-----------------|--------------------|----------------------|-----------------|------------------------|---------------------------|-----------------|------------------------|-------------------------|-----------------|------------------------|------------------------|-----------------|------------------------|--------------------------------|-----------------|------------------------|--|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | | |
| | # of Bank Loans | \$(000s) Bank Loans | % of Bank Total | Overall Market (#) | % of AA Families | % of Bank Loans | % of Aggregate Lending | % of AA Families | % of Bank Loans | % of Aggregate Lending | % of AA Families | % of Bank Loans | % of Aggregate Lending | % of AA Families | % of Bank Loans | % of Aggregate Lending | % of AA Families | % of Bank Loans | % of Aggregate Lending | | |
| De Witt County | 20 | 2,852 | 100 | 467 | 21.2 | 15.0 | 7.3 | 25.0 | 25.0 | 17.8 | 26.4 | 25.0 | 23.3 | 27.4 | 35.0 | 30.8 | 0.0 | 0.0 | 20.8 | | |

Source: 2015 ACS Census, 01/01/2019 - 12/31/2021 bank data, 2021 HMDA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2019-2021 | |
|--|---------------------------------|------------------------|-----------------------|--------------------|---------------------------------|-----------------|------------------------|--------------------------------|-----------------|--|-----------------|------------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # of Bank Loans | \$(000s) of Bank Loans | % of Total Bank Loans | Overall Market (#) | % of AA Businesses | % of Bank Loans | % of Aggregate Lending | % of AA Businesses | % of Bank Loans | % of AA Businesses | % of Bank Loans | | |
| De Witt County | 20 | 1,533 | 100 | 156 | 76.5 | 75.0 | 38.5 | 4.7 | 20.0 | 18.8 | 5.0 | | |

Source: 2021 D&B data, Sample of 40 bank loans 01/01/2019 - 12/31/2021, 2020 CRA Aggregate Data.
Only one loan for \$10,000 in the sample did not have revenue information.
Note: Due to rounding, totals may not equal 100.0%.