



PUBLIC DISCLOSURE

January 03, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Houston, National Association
Charter Number: 4865

4400 Post Oak Parkway, Suite 2260
Houston, TX 77027

Office of the Comptroller of the Currency

Two Houston Center
909 Fannin Street, Suite 1900
Houston, TX 77010

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 major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the loans are inside the bank's assessment areas (AAs).
- The geographic distribution of business loans is excellent.
- The borrower distribution of loans to businesses of different sizes is reasonable.
- The bank did not receive any Community Reinvestment Act (CRA) related complaints during the evaluation period.
- Although optional, the bank made some community development (CD) donations/investments in both AAs. The CRA officer served on the boards of an affordable housing organization and economic development organization in the City of Dublin. This had a neutral impact on the overall rating.

Loan-to-Deposit Ratio

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

The bank's quarterly average LTD ratio since the last CRA examination was 70 percent. During the evaluation period, the bank's quarterly LTD ratio ranged from a low of 28 percent to a high of 112 percent. Our analysis included a comparison with four similarly situated banks in the area. The comparator banks' quarterly average LTD ratio was 87 percent for the same period, ranging from a low of 64 percent to a high of 100 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 83 percent of its total loans inside its AAs during the evaluation period. This percentage includes loans originated under the Small Business Administration (SBA) Payment Protection Program (PPP). This analysis is performed at the bank, 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		
	#	%	#	%		\$	%	\$	%	
Houston Commercial	161	77.8	46	22.2	207	183,085	76.2	57,069	23.8	240,154
Houston PPP Loans	254	85.8	42	14.2	296	54,681	84.9	9,734	15.1	64,415
Dublin-Comml. & PPP	20	100.0	0	0.0	20	457	100.0	0	0.0	457
Total	435	83.2	88	16.8	523	238,223	78.10	66,803	21.9	305,026

Description of Institution

Bank of Houston, National Association (BOH) is a full-service, single-state community bank headquartered at 4400 Post Oak Parkway, Houston, Texas, which is located in the Houston-The Woodlands-Sugar Land TX Metropolitan Statistical Area (Houston MSA). The bank is wholly-owned by BOH Holdings, Inc., a one-bank holding company headquartered in Houston, Texas. The bank operates two full-service, brick-and-mortar branch locations including one at its main office in Houston (Harris County) and one at its former main office in Dublin, Texas (Erath County). At its last examination, the bank was operating as The Dublin National Bank in Dublin, Texas. In January 2018, it was announced that the bank would be acquired by BOH Holdings, Inc. The bank merger was completed in April 2018. At this time, the bank's official headquarters was moved from Dublin, Texas to Houston, Texas and the bank was renamed Bank of Houston, National Association. The bank's Dublin office remains open as a full-service branch.

BOH is primarily a commercial lender. The bank offers a variety of commercial loan products including business lines of credit, equipment financing, owner-occupied real estate financing, and investment real estate loans. The bank also provides personal and auto loans to consumers and limited residential mortgage lending. In addition to loans the bank provides traditional commercial and personal deposit services. Treasury management services are also offered. The bank participates in the Certificate of Deposit Account Registry program, which provides depositors the ability to deposit funds in multiple banks and keep all accounts insured up to \$250,000.

Total bank assets as of September 30, 2021, were \$445 million. Total loans were \$333 million. The majority of the loan portfolio is comprised of commercial loans which total 68 percent of the portfolio by dollar and 54 percent by number. The bank's tier 1 capital is \$42 million. During the evaluation period in 2020, the bank responded to its commercial lending needs by participating in SBA PPP lending. The bank originated 313 PPP loans totaling \$99 million. We reviewed the total population of these during the examination.

The bank has two AAs. One in the Houston MSA which consists of all of Harris, Fort Bend, and Montgomery counties and one in Dublin, Texas which consists of all of Erath and Comanche counties. The Houston branch has 92 percent of the bank's deposits, and the Dublin branch has 8 percent of the bank's deposits.

The Houston branch is open Monday through Friday from 9:00 AM to 4:00 PM. The bank's Dublin branch is open Monday through Friday from 9:00 AM to 3:00 PM with extended drive-thru hours from 8:30 AM through 04:00 PM during the week, extended to 6:00 PM on Friday and to 12:00 PM on Saturday. The hours offered by the bank's branches are reasonable for the communities where they are located.

The former charter of The Dublin National Bank received an overall Satisfactory rating at the last CRA examination dated July 3, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for lending was from January 1, 2019 through December 31, 2021. The product reviewed was commercial loans. We performed data integrity during this examination of all commercial and PPP loans. The bank is not required to report these loans; however, it has chosen to collect geographic and revenue information. We found the geographic data from both types of loans to be reliable. Therefore, we were able to use the entire population for geographic analysis. We found Dublin AA commercial and PPP loan information reliable for revenue analysis. However, the error rate on the Houston AA commercial loans, did not allow us to use the entire population for revenue distribution analysis; therefore, we relied on a sample of 55 loans for the Houston AA revenue analysis.

We reviewed a sample of 55 commercial loans from the Houston AA, excluding PPP loans for revenue distribution, and the entire population (161 loans) of the Houston commercial loans for geographic distribution. We reviewed the total population of PPP loans (254) for the Houston AA for revenue and geographic distribution. We reviewed the total population of commercial and PPP loans combined for the Dublin AA (20). There were 17 PPP loans and 3 commercial loans made in the Dublin AA, during the evaluation period. Although CD is optional for small banks, the bank did participate in some CD activities during the evaluation period. The evaluation period for these were from acquisition date (April 2018) through December 31, 2021.

Selection of Areas for Full-Scope Review

Both the Houston and Dublin AAs received a full-scope review in our evaluation. More weight was given to the performance in the Houston AA, due to size of the AA and volume of loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's 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.

Description of Institution’s Operations in Texas

Table A – Demographic Information						
Metropolitan Statistical Area: Houston AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	921	16.4	29.5	23.0	30.3	0.8
Population by Geography	5,517,279	12.9	27.1	26.0	33.8	0.3
Housing Units by Geography	2,067,422	13.6	26.0	25.1	35.0	0.3
Owner-Occupied Units by Geography	1,110,317	5.8	22.1	27.4	44.6	0.1
Occupied Rental Units by Geography	768,637	22.6	30.8	23.0	23.0	0.6
Vacant Units by Geography	188,468	22.9	29.3	20.3	27.2	0.3
Businesses by Geography	608,372	9.9	18.0	22.0	49.9	0.2
Farms by Geography	8,523	6.0	16.1	25.9	52.0	0.1
Family Distribution by Income Level	1,323,623	25.1	16.2	16.9	41.9	0.0
Household Distribution by Income Level	1,878,954	25.1	16.1	16.8	42.0	0.0
Median Family Income MSA – Houston AA		\$69,373	Median Housing Value			\$177,463
			Median Gross Rent			\$979
			Families Below Poverty Level			13.3%
<i>Source: 2020 ACS Census 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>						

Houston AA is known for petrochemical industry, oilfield equipment, and is a major center for biomedical research, aeronautics, and technology. Houston is home to the Texas Medical Center. The area has many colleges and primary schools located in the area, which provide jobs and stability. We made two community contacts in the Houston AA. One was to a business-related organization, which promotes the success of small businesses and developing the area workforce. This organization indicated there was a need for small business lending in the area. The second contact was to a local college Small Business Development Center (SBDC). The SBDC connects business clients with SBA lenders. The majority of opportunities exist for small businesses employing 10-20 employees. There are numerous opportunities in the Houston AA.

The Houston AA has 151 low-income census tracts (CTs) (16 percent) and 272 moderate-income CTs (30 percent).

Table A – Demographic Information						
Non-Metropolitan Statistical Area: Dublin AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	8.3	75.0	16.7	0.0
Population by Geography	53,662	0.0	7.5	80.7	11.8	0.0
Housing Units by Geography	24,493	0.0	7.1	79.7	13.2	0.0
Owner-Occupied Units by Geography	12,622	0.0	7.4	76.1	16.4	0.0
Occupied Rental Units by Geography	7,069	0.0	6.0	87.0	6.9	0.0
Vacant Units by Geography	4,802	0.0	8.0	78.3	13.7	0.0
Businesses by Geography	4,500	0.0	6.9	80.4	12.7	0.0
Farms by Geography	492	0.0	2.8	77.6	19.5	0.0
Family Distribution by Income Level	12,431	21.7	16.9	21.2	40.2	0.0
Household Distribution by Income Level	19,691	27.6	15.8	18.4	38.3	0.0
Median Family Income Non-MSA – Dublin AA		\$52,198	Median Housing Value			\$115,947
			Median Gross Rent			\$647
			Families Below Poverty Level			14.5%
<i>Source: 2020 ACS Census 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>						

Dublin, Texas is a small town in north central Texas about two hours south of the Dallas-Fort Worth metroplex. Erath County is the location of two large natural gas plants. The area has a large ranching and farming community. Dublin is home to the oldest Dr Pepper bottling plant in the nation. We made one community contact during the evaluation period. This was to a local Economic Development Corporation. This contact indicated there is a need in the area for affordable housing, financing of start-up businesses, and entrepreneurs and economic development loans.

The Dublin AA does not have any low-income CTs and only one moderate-income CT (8 percent). The one moderate tract is in Comanche County and is approximately 21 miles from Dublin. The bank's lending in Comanche County are closer to the Comanche/Erath county line and in middle income CTs.

Lending Test

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

Based on a full-scope review, the bank's performance in the Houston AA is reasonable.

The bank did not make any loans in the one moderate CT in the Dublin AA, which is outside the City of Dublin. This had a neutral effect.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the Houston AA.

The Dublin AA does not have any low-income CTs and one moderate-income CT. This moderate tract is in Comanche County, which is approximately 21 miles outside the City of Dublin. This had a neutral bearing in the overall geographic distribution conclusion.

Small Loans to Businesses

Refer to Table Q 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.

Houston AA Business loans (161 loans reviewed)

The distribution of loans located in low-and-moderate CTs is excellent. The percentage of small business loans in low-income geographies exceeds the businesses and the aggregate distribution of loans located in low-income geographies. The percentage of loans in moderate-income geographies is equal to the percent of businesses and near to the aggregate of businesses in moderate-income geographies.

PPP loans (254 loans reviewed)

The distribution of loans located in low-income CTs is excellent and poor in moderate-income CTs.

The percentage of PPP loans in low-income geographies exceeds the businesses and the aggregate distribution of loans located in low-income geographies. The percentage of loans in moderate-income geographies is significantly lower than the percent of businesses and the aggregate of businesses in moderate-income geographies.

Dublin AA Business and PPP loans combined (20 loans reviewed)

The Dublin AA does not have any low-income CTs. The bank did not make any loans in the one moderate-income tract. This moderate tract is in Comanche County, which is approximately 21 miles outside the City of Dublin. This had a neutral bearing in the overall geographic distribution conclusion.

Lending Gap Analysis

There were no unexplained lending gaps identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to small businesses, given the product lines offered by the bank.

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.

Houston AA Commercial Loans (55 loans sampled – 45 loans in the AA)

The distribution of the bank's small loans to businesses with revenues less than or equal to \$1 million is reasonable. The percent of bank loans was somewhat lower than the percent of small businesses in the AA. However, the percent of bank loans exceeds the aggregate comparators of small business loans in the AA.

PPP loans (99 loans reviewed)

Of the 254 PPP loans, only 99 of the loans had income reported. The collection of revenue information was not a requirement for PPP loans. We analyzed the 99 loans with revenue information collected. The distribution of the bank's small loans to businesses with revenues less than or equal to \$1 million is reasonable. The percent of bank loans was somewhat lower than the percent of small businesses in the AA. However, the percent of bank loans exceeds the aggregate comparators of small business loans in the AA.

Dublin AA Commercial and PPP loans combined (20 loans reviewed)

The distribution of the bank's small loans to businesses with revenues less than or equal to \$1 million is excellent. The percent of bank loans exceeds the percent of small businesses in the AA and the aggregate comparator of small business loans in the AA.

Responses to Complaints

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

Community Development

CD activities are optional for a small bank. Based on a full-scope review the bank exhibits reasonable responsiveness to CD needs in its AAs through qualified donations/investments and services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to CD activities had a neutral effect on the bank's rating.

In the Houston AA the bank made nine donations totaling \$25,000 and had one mortgage backed security for \$1.2 million, which provided affordable housing. Most of the donations were to school related functions, as well as local hospitals and first responder organizations in the area.

In the Dublin AA, the bank made ten donations totaling \$1,000. The donations were similar in nature to the Houston donations. In addition, the CRA officer serves as a board member for the local housing authority and the local Economic Development Corporation. He has served on these boards in various capacities for many years.

The bank made one regional donation for \$1,000 to the Ronald McDonald House located in Corpus Christi.

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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Small Business loans and SBA PPP loans (Optional: Community development - qualified investments/donations and services)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
(Name of Affiliate (Abbreviation)) NA		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Houston AA	Full-Scope	Small Business Loans and PPP Loans
Dublin AA	Full-Scope	Small Business Loans and PPP Loans

Appendix B: Summary of MMSA and State Ratings

RATINGS: Bank of Houston, N.A.	
Overall Bank:	Lending Test Rating
Bank of Houston, N.A.	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 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 AA.

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-2021**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Business Loans – Houston AA	161	183,085	37.0	9.9	10.6	10.4	18.0	18.0	18.3	22.0	13.7	22.7	49.9	57.7	48.4	0.2	0.0	0.2
PPP Loans -Houston	254	54,681	58.4	9.9	13.8	10.4	18.0	9.8	18.3	22.0	18.9	22.7	49.9	57.1	48.4	0.2	0.4	0.2
Business Loans and PPP Dublin AA	20	457	4.6	0.0	0.0	0.0	6.9	0.0	7.0	80.4	70.0	76.1	12.7	30.0	16.9	0.0	0.0	0.0
Total	435	238,223	100	9.8	8.1	10.4	17.9	25.9	18.3	22.4	34.2	23.0	49.7	48.3	48.2	0.2	0.1	0.2

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; "--" data not available.

Due to rounding, totals may not equal 100.0

Geographic analysis based on total population of loans

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		
	#	\$000	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Business Loans – Houston AA*	45	37,335	57.2	185,360	88.3	71.1	37.6	4.1	28.9	7.6	0.0	
PPP Loans - Houston **	99	27,440	42.1	185,360	88.3	67.7	37.6	4.1	32.3	7.6	**	
Business Loans and PPP Dublin AA	20	457	0.7	1,238	86.3	95.0	36.7	4.0	5.0	9.7	0.0	
Total	164	65,232	100	123,986	87.6	77.9	37.3	4.1	22.1	8.3	0.0	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; "--" data not available.

Due to rounding, totals may not equal 100.0

**Of the 161 commercial loans, we sampled 55 loans for revenue distribution of which 45 of these were in the AA.*

Table above reflects the 45 loans in AA

*** The original 254 PPP loans in the AA; had 155 with unknown income (62 percent) – Income was not a requirement of PPP loans – Table above reflects 99 PPP loans with income.*