



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 22, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Baker Boyer National Bank
Charter Number: 3956

7 West Main Street
Walla Walla, WA 99362

Office of the Comptroller of the Currency

101 Stewart Street, Suite 1010
Seattle, WA 98101

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on primarily Baker Boyer National Bank's (Baker Boyer, or bank) satisfactory performance in the state of Washington, which consisted of the significant majority of activity. Additionally, the rating is supported by the bank's reasonable loan-to-deposit rates and substantial majority of lending within the assessment areas (AAs). In aggregate, these represent satisfactory responsiveness to lending needs in the AAs Baker Boyer serves.
- The Community Development (CD) Test rating is based primarily on the bank's adequate responsiveness to community needs for the AAs in the state of Washington, which consisted of the significant majority of the bank's overall activity.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio was reasonable.

During the evaluation period of January 1, 2022, to December 31, 2024, Baker Boyer averaged an LTD ratio of 55.9 percent, with the highest quarterly LTD ratio being 66.2 percent and the lowest quarterly ratio being 45.1 percent. This represents a reasonable amount of lending relative to deposits considering products offered, lending opportunities, and the bank's strategy to maintain additional liquidity reserves during uncertain economic conditions during the evaluation period. We considered the LTD ratio of four similarly situated peer banks, and Baker Boyer had a similar ratio. Peer institutions in aggregate averaged an LTD ratio of 60.9 percent during the evaluation period, with the average highest quarterly ratio being 80.2 percent, and the lowest average quarterly ratio of 46.9 percent.

Lending in Assessment Area

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

The bank included the Umatilla AA for 2024, therefore we completed the analysis for the period of January 1, 2022, to December 31, 2023, and separately for January 1, 2024, to December 31, 2024, to account for the changes in AAs. We considered lending based on the primary products offered by the bank. In the first evaluation period, the bank originated and purchased 81.7 percent of its total loans inside the bank's AAs. In the second evaluation period, the bank originated and purchased 95.5 percent of its total loans inside the bank's AAs.

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	123	85.4	21	14.58	144	35,479	89.01	4,381	10.99	39,861
Small Business	51	73.9	18	26.1	69	12,882	78.1	3,621	21.9	16,503
Total	174	81.7	21	9.9	213	48,361	85.8	8,002	14.2	56,364

Source: 1/1/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	54	98.2	1	1.8	55	16,297	98.0	333	2.0	16,629
Small Business	31	91.2	3	8.8	34	7,251	94.7	405	5.3	7,656
Total	85	95.5	4	4.5	89	23,548	97.0	738	3.0	24,285

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

Description of Institution

Baker Boyer National Bank is a federally chartered national bank headquartered in Walla Walla, Washington. The bank opened in 1869 and is currently the oldest bank in the state of Washington. The bank obtained a national bank charter in 1889. As of December 31, 2024, the bank operated six branches within the state of Washington and one deposit-taking automated teller machine (ATM) in Oregon. The bank is wholly owned by Baker Boyer Bancorp, a one bank holding company also based in Walla Walla.

Baker Boyer has four branch offices in Walla Walla, and one branch each in Kennewick and Yakima. The Milton-Freewater branch, previously located in the Umatilla, OR AA, closed in June 2022. In response to community requests, management reopened an automated teller machine (ATM) at the location on June 1, 2024. Baker Boyer has designated four separate AAs consisting of 156 census tracts (CTs) for the bank. Within the state of Washington, the bank has three AAs which are Walla Walla, Tri-Cities, and Yakima. As of December 31, 2024, AAs in Washington consisted of 4 low-income CTs, 38 moderate-income CTs, 53 middle-income CTs, and 39 upper-income CTs, with four CTs having an unknown income level. In Oregon, the bank's sole AA is Umatilla, which has 14 middle-income CTs and 4 upper-income CTs.

Each of the bank's branches offers similar products and services, while also individually specializing in certain services and products to support the needs of each AA in which they operate. The main branch located in downtown Walla Walla offers the whole suite of products including retail, consumer, and commercial deposit and loan products along with trust, investment, and family advising via D.S. Baker Advisor services. Both the Yakima and Kennewick branches also offer D.S. Baker Advisor services to go along with their commercial lending offerings. The remaining branches focus on retail banking activities. The bank's primary lending products are business loans and home mortgages. Business loan types include commercial real estate, commercial and industrial, and construction and land development loans. Lending products offered to individuals include home mortgage loans, personal loans, home equity lines of credit, auto, recreational vehicle, and land and construction loans. The bank's suite of deposit products includes checking accounts, savings accounts, certificates of deposit, and health savings accounts.

Additional services offered include telephone banking, a mobile banking app, traditional online banking, ATM access, night depositories, and drive-thru banking. Hours of operation vary depending on branch location. Walla Walla branch locations are open Monday through Friday 9:00 a.m. to 5:00 p.m. with drive-thru hours extended to 5:30 p.m. The only exception is the Wheatland Village branch in Walla Walla, which is open 2:30 p.m. to 5:00 p.m. Monday through Friday. Both the Kennewick and Yakima branches operate weekdays from 9:00 a.m. to 4:00 p.m.

As of December 31, 2024, Baker Boyer reported \$670 million in total assets and \$66.2 million in tier 1 capital.

The bank did not engage in any merger or acquisition activities during the evaluation period. Baker Boyer does not have any financial or legal impediments that prevent it from meeting the credit needs of the AAs. The previous Community Reinvestment Act (CRA) Performance Evaluation dated September 12, 2022, resulted in an “Outstanding” rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank’s performance was evaluated under the Intermediate Small Bank (ISB) criteria, with an evaluation period of January 1, 2022, to December 31, 2024. The Lending Test evaluates the bank’s record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank’s record of responding to CD needs in its AAs through CD lending, qualified investments, donations, and services. We determined Baker Boyer’s primary loan products to be business loans and home mortgage loans, based on the bank’s lending activity over the evaluation period.

Loans Originated and Purchased by Product Type				
Product Type	Number of Loans		Dollar Amount of Loans	
	#	%	(\$000s)	%
Business Loans	422	51.3	\$171,836	58.0
Home Mortgage	259	31.5	\$61,544	20.8
Agriculture/Farmland	107	13.0	\$55,799	18.8
Consumer	29	3.5	\$1,614	0.5
Other	6	0.7	\$5,625	1.9
Totals	817	100.0	\$296,418	100.0

Source: Bank Records. May not sum to 100% due to rounding.

Commercial loan originations represented the majority of loans by number at 51.3 percent, and by dollar volume at 58.0 percent. Home mortgage loans were the second largest segment in the loan portfolio, representing 31.5 percent by number and 20.8 percent by dollar amount. Other lending products include agriculture and farmland loans as well as a small volume of consumer loans. Based on this lending data we gave greater weight to the performance in small loans to businesses in our Lending Test conclusions.

Baker Boyer is required to report mortgage lending data by the Home Mortgage Disclosure Act (HMDA). Mortgage data is provided for all areas based on reported HMDA data. The U.S. Census 2020 is used as the source of demographic data and CT income levels for 2022 and 2023, with the U.S. Census 2024 data used for 2024. Prior to this evaluation, we tested the accuracy of Baker Boyer’s publicly filed information on home mortgage loans. The HMDA data we reviewed was collected and

reported by the bank over the evaluation period. The testing indicated no substantive inaccuracies in the data for home mortgage loans; therefore, we determined the data is reliable. For business lending, we utilized a random sample of small business loans that were eligible for the Lending Test for Walla Walla and Yakima AAs and included all eligible loans for Umatilla and Tri-Cities AAs. For CD activities we completed a review of the bank's submission and included loans, investments, and services we were able to verify are eligible under the CRA.

Selection of Areas for Full-Scope Review

In each state where the bank has an office or deposit-taking ATM, one or more of AAs within that state was selected for a full-scope review. Refer to the *Scope* section under each *State Rating* section 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 bank's overall rating is a blend of the state ratings, however we relied primarily on the Washington state rating, as activity within in Oregon was minimal and only considered for 2024.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national 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 Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Washington

CRA rating for the State of Washington¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited an overall reasonable distribution of home mortgage loans to individuals of different income levels and small loans to businesses of different sizes, within the state.
- The bank exhibited an overall reasonable geographic distribution of home mortgage and small loans to businesses within the state.
- The bank demonstrated adequate responsiveness to the community's CD needs through a combination of community development loans, investments, donations, and service hours.

Description of Institution's Operations in Washington

Baker Boyer designated three AAs within the state of Washington, with the majority of activity occurring in the Walla Walla AA, which is also where the bank's headquarters and four branches are located. Baker Boyer offers similar services across all three AAs.

Walla Walla

The Walla Walla AA consists of the entirety of Walla Walla County and is in southeast Washington. As identified by compass, the Walla Walla AA is bordered to the north by Franklin County, to the west by Benton County, and to the east by Columbia County. The county's southern boundary forms part of the Washington-Oregon border, which is adjacent to the Umatilla AA in Oregon. Walla Walla is the largest city in the AA, with the bank's headquarters situated in downtown. The AA consists of 14 CTs, of which none are considered low-income, while three or 21.4 percent are considered moderate-income. The median family income for 2024 is \$84,600. This AA represents the vast majority of Baker Boyer's deposit share and lending activity.

According to Moody's March 2025 analysis, the Walla Walla economy is improving. The job market has grown reducing unemployment rates, with healthcare industry growth in particular outpacing weaknesses in the manufacturing sector. Moody's considered food-dependent and agriculture industries to continue as an anchor for the local economy; however, exports of apples to other nations might decline if retaliatory tariffs continue on U.S products. The food manufacturing industry is anticipated to not be impacted. Tourism, specifically for the wine industry, is also a big driver with more than 120 wineries in the area. The wine industry has faced some difficulty as tourism demand declined. The top three employers in the area are Broetje Orchards, Tyson Fresh Meats, and Providence St. Mary Medical Center. Housing in the area has appreciated at a similar rate to the rest of the U.S, with steady residential

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

construction. Overall, Moody’s expects the Walla Walla economy to grow more slowly than the rest of the Western U.S region in the near term; longer-term subpar population trends and reliance on low-wage agricultural jobs will have Walla Walla underperform in relation to state peers.

The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2024, shows seven banks with a total of 16 branches in Walla Walla County. The top bank by market share is Banner Bank with 41.5 percent of the market, with the next biggest being Baker Boyer with 31.6 percent of the market. Both institutions have 5 branches within the county. For reference, the FDIC Deposit Market Share Report does not include deposits held at credit unions, which also operate in the county.

A review of HMDA data showed Baker Boyer faces significant competition for home mortgage loans in the AA, with 143 financial institutions reporting loans originated or purchased within the AA in 2023. However, the bank managed to maintain a reasonable market share within the AA. The top home mortgage loan originator in the AA was Academy Mortgage Corporation at 9.3 percent of the market by number of applications, while Baker Boyer was ranked 6th with 4.4 percent of the market share.

We held a discussion with one community contact who worked with a community development organization. The community contact indicated additional housing to improve housing affordability is a common concern in the region. The contact also mentioned the region would benefit from additional support for new businesses, including generally improving infrastructure within downtown regions to support business growth. The contact did not have specific knowledge on programs to impact housing, but did mention the organization works with local financial partners to provide small businesses assistance. While the contact identified that additional financing of new businesses would be helpful, they understood there would be difficulty providing credit to borrowers without much financial history or support. The community contact had a favorable view of the contribution of local financial institutions to the community.

Assessment Area(s) - Walla Walla						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	21.4	64.3	7.1	7.1
Population by Geography	62,584	0.0	18.6	68.1	9.5	3.8
Housing Units by Geography	24,871	0.0	21.4	70.4	8.2	0.0
Owner-Occupied Housing by Geography	14,570	0.0	16.2	72.5	11.4	0.0
Occupied Rental Units by Geography	8,203	0.0	31.6	65.2	3.2	0.0
Vacant Units by Geography	2,098	0.0	17.9	76.8	5.3	0.0
Businesses by Geography	2,277	0.0	20.3	69.8	9.8	0.1
Farms by Geography	229	0.0	6.1	83.4	10.5	0.0
Family Distribution by Income Level	14,792	18.1	17.9	24.0	40.0	0.0
Household Distribution by Income Level	22,773	23.8	17.1	18.2	40.9	0.0
Unemployment rate (%)	5.5	0.0	7.9	5.3	0.7	0.0
Households Below Poverty Level (%)	12.8	0.0	18.9	12.1	3.3	0.0
Median Family Income (47460 - Walla Walla, WA)		\$75,853			Median Housing Value	\$233,950
Median Family Income (47460 - Walla Walla, WA) for 2024		\$84,600			Median Gross Rent	\$876
					Families Below Poverty Level	6.0
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Washington

Ratings in the state of Washington are based primarily on the bank's performance in the full-scope AA of Walla Walla. The AAs of Tri-Cities and Yakima also received consideration; however, we conducted limited-scope reviews. The Walla Walla AA was selected as the sole full-scope AA due to having a substantial majority of deposit share at the bank, with 86.1 percent of deposits held within the AA as of June 30, 2024. Additionally, the Walla Walla AA had the majority of lending activity. Both the Tri-Cities and Yakima AAs did not have enough home mortgage lending activity during the period to provide a meaningful analysis. The Tri-Cities AA also did not have enough small loans for a meaningful analysis of small loans to businesses. Lending activity in the Yakima and Tri-Cities AAs is evaluated relative to the bank's low market share penetration. Based on the FDIC June 30, 2024, deposit market share report, Baker Boyer held a 0.9 percent, and 1.0 percent of market share of deposits in the Yakima and Tri-Cities AAs, respectively.

Deposit Share by AA as of June 30, 2024		
Assessment Area	\$ of Deposits in (000's)	% of Total
Walla Walla	510,696	86.1
Tri-Cities	46,805	7.9
Yakima	35,725	6.0
Total	593,226	100.0

Source is FDIC Summary of Deposits

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Washington was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

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

In the Walla Walla AA, there are no low-income CTs, so our analysis relied on dispersion of credit within the moderate-income CTs. During the evaluation period, Baker Boyer originated 7.5 percent of their home mortgage loans by number within moderate-income CTs, which trailed compared to competitor institutions within the AA who originated 14.1 percent of their loans within moderate-income CTs. This was also below the 16.2 percent of owner-occupied housing units within

moderate-income CTs. We took into consideration the significant competition Baker Boyer faces within the AA from other banks, non-bank mortgage originators, and credit unions. We also took into consideration reduced mortgage demand as rates rose, furthering competition.

Small Loans to Businesses

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

In the Walla Walla AA, there are no low-income CTs, so our analysis relied on dispersion of credit within the moderate-income CTs. Based on our sample of loans, during the evaluation period Baker Boyer originated 18 percent of loans within moderate-income CTs, which was comparable to other institutions within the AA who originated 22.3 percent of their loans within moderate-income CTs. It also compares similarly to the percentage of businesses within moderate-income CTs, which was 20.3 percent.

Lending Gap Analysis

We completed a lending gap analysis by reviewing lending information and maps reflecting income levels of CTs within the AA, and did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

In the Walla Walla AA, Baker Boyer, by number, originated 7.5 percent of home mortgage loans to low-income borrowers, which compares favorably to other institutions who originated 4.5 percent of their loans to low-income borrowers. Considering lending to moderate-income borrowers, Baker Boyer fared similarly to competitor institutions, originating 10.9 percent of loans compared to the aggregate of competitors at 14.5 percent.

Small Loans to Businesses

Refer to Table 10 in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on our sample of loans in the Walla Walla AA, Baker Boyer performed slightly better than competitor institutions, originating 55.9 percent of small loans to businesses with revenue equal to or under \$1 million, compared to the competitors aggregate of 54.4 percent.

Responses to Complaints

There have been no complaints related to Baker Boyer's CRA performance in the state of Washington during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Tri-Cities and Yakima AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. We only considered small loans to businesses, as home mortgage loans totaled only 16 during the evaluation period, which was insufficient to perform a meaningful analysis.

During the evaluation period, lending activity within the Tri-Cities AA was insufficient to perform a meaningful analysis, with only 12 home mortgage loans and 19 small loans to business during the period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Walla Walla AA	2	100	1,830	100
Yakima County	0	0	0	0
Tri-Cities	0	0	0	0
Total	2	100	1,830	100

Baker Boyer demonstrates adequate responsiveness to community development needs within the bank's AAs. Qualified CD loans were limited to the Walla Walla AA, which is also where the bank conducts most of its activity. The first loan was to support the expansion of an organization that provides affordable housing and other services targeted to low- or moderate-income families. The second loan supported a business providing transportation for individuals on Medicaid.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Walla Walla County	2	665	15	869	17	27	1,534	39.3	0	0
Yakima County	2	835	16	31	18	28.6	866	22.2	0	0
Tri-Cities	9	1480	18	17	27	42.9	1,497	38.4	0	0
Broader Regional Area	0	0	1	5	1	1.6	5	0.1	0	0
Total	13	2,980	50	922	63	100	3,902	100	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Baker Boyer demonstrated adequate responsiveness to community development investment needs within the Walla Walla AA. During the period, the bank made 15 investments, 13 of which were donations, totaling \$869 thousand. Additionally, two CD qualifying bonds purchased prior to the current evaluation period remained on the balance sheet. In total, this results in 17 investments totaling \$1.5 million.

The following are examples of qualified investments in the Walla Walla AA:

- A \$20,000 donation towards a micro-business grant program to develop new businesses in Walla Walla, including many in moderate-income CTs.
- A \$6,500 donation towards an organization providing housing and services for homeless teens.
- Holding a \$500,000 municipal bond to help finance infrastructure development in a moderate-income CT.

Extent to Which the Bank Provides Community Development Services

Overall, Baker Boyer demonstrated an adequate level of CD services in Washington. Throughout the three AAs, bank employees completed 1,677 hours of CD services across a variety of organizations. Most service hours were to benefit the Walla Walla AA, which totaled 1402 hours or 83.6 percent, which is equivalent to the percentage of the bank's deposits between the AAs.

Examples of these services included:

- Providing financial literacy education to children.
- Serving on organizations providing community and economic development support, including downtown economic planning, marketing for tourism, or infrastructure improvement.
- Providing job role-specific consulting or knowledge sharing as a board member for community organizations serving low- or moderate-income individuals.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Tri-Cities and Yakima AAs was consistent with the bank's overall performance under the CD Test in the full-scope area. While there were no CD loans in either AA, Baker Boyer's CD investments in both AAs were stronger than the Walla Walla AA when considering relative presence in each AA. CD service hours dedicated to the Tri-Cities and Yakima AAs were proportional to the deposit distribution across all three AAs.

State of Oregon

CRA rating for the State of Oregon²: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank only operated a deposit-taking ATM in Oregon starting June 1, 2024. Due to the limited time period and scope of activities within the state, there was not enough activity to complete a meaningful analysis for the Lending Test.
- We still noted that within our limited sample, the penetration to businesses with less than \$1 million in revenue was strong. Due to the lack of low- or moderate-income census tracts in the AA, even with additional activity, an analysis for geographic penetration would not have been possible.
- Community development activities were commensurate with the limited activity within the AA.

Description of Institution's Operations in Oregon

Baker Boyer's scope of operations in Oregon is limited to one deposit-taking ATM within Umatilla County, which is located in the town of Milton-Freewater. The bank previously operated a full-service branch within the town; however, the branch was closed beginning January 1, 2022, due to flooding issues and formally closed on June 17, 2022. Customers in Umatilla County had access to the branch locations in Walla Walla, which is 10 miles away from Milton-Freewater. On June 1, 2024, the bank opened a deposit-taking ATM in Milton-Freewater in response to community requests. To receive other services, for example, loan requests, customers would need to visit a Walla Walla branch.

Umatilla

The Umatilla AA consists of the entire county of Umatilla. The county is located in the Northeastern region of Oregon, south of the Washington border at the convergence of the Umatilla and Columbia Rivers. Hermiston is the largest city in the county, with the overall population for the county being 80,075. The largest cities in the county lie to the west, while the bank's former branch and current deposit-taking ATM sit on the east side of the county, in Milton-Freewater. The median family income for the area in 2024 is \$78,400. There are no low- or moderate-income census tracts. In 2023, the top industries by employment were healthcare and social assistance, retail trade, and educational services. The agricultural industry is also a major source of economic activity in the AA, especially towards Milton-Freewater.

As Baker Boyer does not operate a branch in the AA, it does not appear on the FDIC deposit market share reports. As of the June 30, 2024, report, the top institution was Banner Bank, holding 40.8 percent of deposits. The next biggest was Umpqua Bank (now Columbia Bank) at 18.7 percent.

A review of HMDA data showed Baker Boyer faces significant competition for home mortgage loans in the AA, with 153 financial institutions reporting loans originated or purchased within the AA in 2023.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

The top home mortgage loan originator in the AA was Guild Mortgage Company at 10 percent of the market by number of applications, while Baker Boyer was ranked 44th with 0.4 percent of the market share.

Assessment Area(s) - Umatilla						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	0.0	77.8	22.2	0.0
Population by Geography	80,075	0.0	0.0	79.8	20.2	0.0
Housing Units by Geography	30,722	0.0	0.0	79.8	20.2	0.0
Owner-Occupied Housing by Geography	17,520	0.0	0.0	78.5	21.5	0.0
Occupied Rental Units by Geography	9,303	0.0	0.0	83.8	16.2	0.0
Vacant Units by Geography	3,899	0.0	0.0	75.9	24.1	0.0
Businesses by Geography	2,220	0.0	0.0	81.7	18.3	0.0
Farms by Geography	308	0.0	0.0	75.7	24.4	0.0
Family Distribution by Income Level	18,447	19.1	14.7	22.9	43.3	0.0
Household Distribution by Income Level	26,823	22.8	12.9	17.3	46.9	0.0
Unemployment rate (%)	6.9	0.0	0.0	7.8	3.4	0.0
Households Below Poverty Level (%)	14.3	0.0	0.0	14.4	14.0	0.0
Median Family Income (Non-MSAs - OR)		\$62,963			Median Housing Value	\$166,200
Median Family Income (Non-MSAs - OR) for 2024		\$78,400			Median Gross Rent	\$787
					Families Below Poverty Level	10.6
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Oregon

Umatilla County is the only assessment area within the state of Oregon. As such, we are required to consider the AA for a full-scope review. Home mortgages and small loans to small businesses are also the primary products within the Umatilla County AA; however, we only considered performance in the year 2024, as it was the only year in which a deposit-taking branch or ATM was open for the majority of the year. Due to the unique circumstances, activity in the AA is limited and the resulting data is not sufficient for a meaningful analysis. Therefore, we completed a limited review of the data and present it in this performance evaluation for informational purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Oregon was reasonable.

During the evaluation period of January 1, 2024, to December 31, 2024, Baker Boyer originated two home mortgage loans and nine small loans to businesses. Both the number of home mortgage loans and small loans to businesses were below thresholds for a meaningful analysis. The low number of loans is expected considering the short time range and with offerings in the AA being limited to one

deposit-taking ATM, primarily provided to support existing customers. As the AA does not have low- or moderate-income census tracts, we focused our analysis on the performance for the distribution of loans by income level of the borrower. Within the context of the limited number of loans, we placed greater emphasis on the performance for small loans to businesses, as it made up a greater share of activity.

Distribution of Loans by Income Level of the Geography

The Umatilla AA, which consists of the entire Umatilla County, does not have low- or moderate-income census tracts. Tables 7 and 9 are provided for reference.

Home Mortgage Loans

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

Small Loans to Businesses

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

Lending Gap Analysis

We did not conduct a lending gap analysis, as the number of loans originated during the evaluation period are minimal, and the Umatilla AA does not contain any low- or moderate-income census tracts.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Both the number of home mortgage loans and small loans to businesses were below thresholds for a meaningful analysis. The low number of loans is expected considering the short time range and with offerings in the AA being limited to one deposit-taking ATM, primarily provided to support existing customers.

Home Mortgage Loans

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

During the evaluation period of January 1, 2024, to December 31, 2024, Baker Boyer originated only two home mortgage loans in the Umatilla AA. The number of loans originated is not sufficient to conduct a meaningful analysis of lending performance

Small Loans to Businesses

Refer to Table 10 in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses. During the evaluation period of January 1, 2024, to December 31, 2024, Baker Boyer originated nine small loans to businesses in the Umatilla AA. The number of loans originated is not sufficient to conduct a meaningful

analysis of lending performance; however, we noted of those nine loans, seven or 77.8 percent were to businesses with revenues of \$1 million or less.

Responses to Complaints

There have been no complaints related to Baker Boyer’s CRA performance in the state of Oregon during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA(s). Special consideration was given due to the proximity of Umatilla County to Walla Walla, where community developments efforts in Walla Walla can also benefit the Umatilla AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Umatilla	0	0	0	0
Total	0	0	0	0

During the evaluation period of 2024, Baker Boyer did not originate any loans qualified for CD within the Umatilla AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Umatilla County	0	0	1	2.5	1	100	2.5	100	0	0
Total	0	0	1	2.5	1	100	2.5	100	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During 2024 the bank made one qualified investment within the AA, which consisted of a donation to an organization providing affordable housing for low- or moderate-income families in the AA.

Baker Boyer also made a donation in 2022, while outside the period of Umatilla County being considered an AA, was credited to the broader regional area for the review of performance within the state of Washington.

Extent to Which the Bank Provides Community Development Services

Baker Boyer had four hours of community development service in 2024 within the AA. The service involved an employee serving on a budget committee for a school district within 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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Washington		
Walla Walla	Full-scope	Includes the entire county of Walla Walla
Tri-Cities	Limited scope	Includes the entire counties of Benton and Franklin
Yakima	Limited scope	Includes the entire county of Yakima
Oregon		
Umatilla	Full-scope	Includes the entire county of Umatilla. Only covers the period of 01/01/2024 to 12/31/2024.

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
Baker Boyer National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Washington	Satisfactory	Satisfactory	Satisfactory
Oregon	Satisfactory	Satisfactory	Satisfactory

(* The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Tables for State of Washington

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022-2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Tri-Cities	12	4,242	6.9	24,539	1.0	8.3	0.9	21.4	25.0	18.4	38.1	8.3	38.0	39.2	58.3	42.6	0.2	--	0.2
Walla Walla	147	41,568	84.0	4,126	--	--	--	16.2	7.5	14.1	72.5	69.4	74.2	11.4	23.1	11.6	--	--	--
Yakima	16	5,684	9.1	13,171	0.2	--	0.2	16.2	12.5	16.2	35.5	31.3	31.3	48.1	56.3	52.3	--	--	--
Total	175	51,494	100.0	41,836	0.6	0.6	0.6	18.9	9.1	17.3	40.8	61.7	39.5	39.7	28.6	42.6	0.1	--	0.1

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000's)	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Tri-Cities	12	4,242	6.9	24,539	20.3	--	4.6	18.4	25.0	16.4	19.9	--	27.4	41.4	58.3	40.0	--	16.7	11.6
Walla Walla	147	41,568	84.0	4,126	18.1	7.5	4.5	17.9	10.9	14.5	24.0	15.0	23.2	40.0	55.8	43.2	--	10.9	14.6
Yakima	16	5,684	9.1	13,171	20.3	--	4.5	18.5	--	13.7	21.6	6.3	25.0	39.6	50.0	42.7	--	43.8	14.1
Total	175	51,494	100.0	41,836	20.1	6.3	4.6	18.4	10.9	15.3	21.0	13.1	26.2	40.5	55.4	41.2	--	14.3	12.7

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-2024

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Tri-Cities	19	5,796	26.0	10,356	2.3	0	2.6	29.1	32.0	26.6	37.2	57.9	36.6	30.4	1	32.8	0.9	1	1.4
Walla Walla	34	9,562	46.6	1,821	--	0	--	20.3	18.0	22.3	69.8	58.8	68.8	9.8	8	8.9	0.1	0	--
Yakima	20	3,941	27.4	6,650	7.2	0	5.8	20.2	5.0	22.7	31.7	35.0	33.3	41.0	12	38.2	--	0	--
Total	73	19,299	100.0	18,827	3.9	0	3.5	24.7	17.8	24.8	39.1	52.1	38.5	31.8	28.8	32.4	0.5	1.4	0.8

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

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$(000's)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Tri-Cities	19	5,796	26.0	10,356	81.67	63.2	52.3	8.04	36.8	10.3	0
Walla Walla	34	9,562	46.6	1,821	79.36	55.9	54.4	9.35	44.1	11.3	0
Yakima	20	3,941	27.4	6,650	79.31	40.0	58.0	8.89	60.0	11.8	0
Total	73	19,299	100.0	18,827	80.5	53.4	54.5	8.52	46.6	11.0	0

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

Tables for State of Oregon

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Umatilla	2	282	100.0	1,650	--	--	--	--	--	--	78.5	100.0	80.1	21.5	--	19.9	--	--	--
Total	2	282	100.0	1,650	--	--	--	--	--	--	78.5	100.0	80.1	21.5	--	19.9	--	--	--

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000's)	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Umatilla	2	282	100.0	1,650	19.1	--	3.8	14.7	--	12.9	22.9	50.0	21.9	43.3	--	40.1	--	50.0	21.5
Total	2	282	100.0	1,650	19.1	--	3.8	14.7	--	12.9	22.9	50.0	21.9	43.3	--	40.1	--	50.0	21.5

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Umatilla	9	835	100	2,124	--	--	--	--	--	--	81.7	100.0	83.3	18.3	--	16.7	--	--	--
Total	9	835	100	2,124	--	--	--	--	--	--	81.7	100.0	83.3	18.3	--	16.7	--	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Umatilla County

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2024**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$(000's)	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Umatilla	9	835	100	2,124	78.1	77.8	52.4	10	22.2	11.9	--
Total	9	835	100	2,124	78.1	77.8	52.4	10	22.2	11.9	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%