



## **PUBLIC DISCLOSURE**

April 11, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Citizens First National Bank of Storm Lake  
Charter Number: 10034

529 Lake Avenue  
Storm Lake, IA 50588

Office of the Comptroller of the Currency

Sioux Falls Field Office  
4900 South Minnesota Avenue, Suite 300  
Sioux Falls, SD 57108

**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 **Outstanding**.

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on performance in the State of Iowa. The Citizens First National Bank of Storm Lake (CFNB or bank) has one assessment area (AA) in the State of Iowa comprising all census tracts (CTs) in Buena Vista County and Sac County.
- CFNB exhibits excellent geographic distribution of loans to geographies of different income levels and excellent distribution of loans to borrowers of different income levels and farms of different sizes. Additionally, management originated a majority of loans inside the AA and the bank’s loan-to-deposit (LTD) ratio is reasonable.

## Loan-to-Deposit Ratio

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

CFNB’s average quarterly LTD ratio for the 16 quarters from March 31, 2018, to December 31, 2021, was 63 percent. The ratio ranged from a quarterly low of 53 percent to a quarterly high of 73 percent. The ratio decreased over the 16 quarters which is attributable to decreased agricultural loan demand. Agricultural loan needs slowed due to agricultural borrowers benefitting from pandemic-related government stimulus payments and improved commodity prices.

We conducted a LTD analysis using eight similarly situated banks operating within the bank’s AA with total assets between \$37 million and \$348 million. CFNB’s average LTD ratio modestly exceeded the comparable bank’s average LTD ratio of 62 percent. The comparable bank’s LTD ratio ranged from an average quarterly low of 34 percent to an average quarterly high of 100 percent.

## Lending in Assessment Area

A majority of the bank’s loans are inside its AA.

Management originated and purchased 63 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	12	60	8	40	20	1,211	52	1,132	48	2,343
Consumer	13	65	7	35	20	135	67	67	33	202
Total	25	63	15	37	40	1,346	53	1,199	47	2,545

## **Description of Institution**

CFNB is a single-state community financial institution headquartered in Storm Lake, Iowa. As of December 31, 2021, CFNB had total assets of \$258 million and tier one capital of \$24 million. CFNB is a wholly owned subsidiary of FNC., Inc. FNC., Inc. is located in Storm Lake, Iowa and had total assets of \$79 million as of December 31, 2021. CFNB has one subsidiary, Citizens Credit Corporation, that acts as an insurance agency. The subsidiary does not have an impact on the bank's capacity for community reinvestment and is not considered when evaluating the bank's performance.

CFNB operates three branches in the counties of Buena Vista and Sac. Two branches are located in Storm Lake, Iowa and one branch is located in Early, Iowa. The Storm Lake branches contain deposit-taking ATMs. No branches were opened or closed during the evaluation period, and no merger or acquisition activity occurred during the evaluation period.

CFNB offers traditional deposit and lending products and services. CFNB offers a variety of agricultural, commercial, consumer, and residential real estate lending products, with primary business focus on agricultural and consumer lending. As of December 31, 2021, total loans were \$132 million representing 51 percent of total assets. Agricultural loans totaled \$81 million and represented 316 percent of capital, and consumer loans totaled \$9 million and represented 36 percent of capital. Although consumer loans represent a smaller portion of capital, consumer loans represent 39 percent of originations by number from 2019 to 2021.

For the purposes of Community Reinvestment Act (CRA), CFNB operates with one rating area and one AA. CFNB's rating area is the State of Iowa. The AA includes all CTs in the counties of Buena Vista and Sac. The AA contains one moderate CT and nine middle income CTs.

There are no legal, financial, or other impediments limiting CFNB's ability to meet the credit needs in its AA during the evaluation period. CFNB received a Satisfactory rating in its last performance evaluation dated April 2, 2018.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated CFNB using Small Bank CRA examination procedures. The bank's overall rating is based on the Lending Test, which evaluates the bank's record of meeting the credit needs of the AA through its lending activities. The evaluation period for the Lending Test was January 1, 2019, to December 31, 2021. We sampled agricultural and consumer loans originated during the evaluation period, as those were determined to be the bank's primary loan products when considering volume by number and dollar.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

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

Given CFNB has operations in a single state, all weight was applied to the State of Iowa rating. Farm loans are weighted more heavily as they represent a higher percentage of loans by dollar volume. However, consumer loans are weighted more heavily in geographic distribution analysis given there are fewer agricultural lending opportunities in the moderate-income CT.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) 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.

# State Rating

## State of Iowa

**CRA rating for the State of Iowa<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The geographic distribution of farm and consumer loans to geographies of different income levels reflects excellent distribution of AA demographics.
- The borrower distribution of loans to consumer borrowers of different income levels and farms of different sizes reflects excellent distribution of AA demographics.

## Description of Institution's Operations in Iowa

CFNB's operations in the State of Iowa are centered in its single AA, the Iowa Non-MSA AA, which includes Buena Vista and Sac counties. The AA includes three branches. CFNB's primary business focus in the AA is consumer and agricultural lending.

Competition in the AA is moderate and includes regional and local community banks. As of June 30, 2021, there were 13 institutions with 26 banking offices in the AA. CFNB had \$219 million in deposits inside the AA as of June 30, 2021, which represents 100 percent of the bank's total deposits. CFNB ranked third in deposit market share with a market share of 15 percent.

The Iowa Non-MSA comprises one moderate income CT and nine middle income CTs. Thirty-one thousand people, or 14 thousand households, live in the AA. The AA includes 3 thousand businesses. 83 percent of the businesses are non-farm businesses and 71 percent of businesses employ fewer than five individuals.

The economy in the AA fluctuated during the period. According to the Bureau of Labor Statistics, the average unemployment rate for the two counties in the AA was 2.9 percent in January 2019 and 2.7 in December 2021. The highest local unemployment rate during the evaluation period was 6.6 percent in Sac County in April 2020, and the lowest unemployment rate was 1.5 percent in Sac County in October and November 2019. Major areas of employment for the AA include the services and agriculture industries.

We completed two community contacts in the AA to assess the adequacy of financial institutions in meeting the credit needs of the local community. The first contact works for an organization involved with the development of local entrepreneurs. The contact stated local banks are providing lending and technology needs for businesses and agricultural customers, including resources to facilitate online banking relationships and business presence during the COVID-19 pandemic. The second contact represents an organization for development in local rural counties through workforce analytics and talent

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

recruitment. The contact discussed recruitment efforts at the local processing plants and the increase in workers from outside the area. The new residents create a need for ancillary businesses such as childcare and restaurants as well as lending for businesses, consumer products, and homes. Both contacts stated local bankers regularly take part in recruitment events with the community to promote awareness for banking products and services. The contacts did not identify any specific unmet credit needs in the AA.

### Iowa Non-MSA AA

<b>Table A – Demographic Information of the AA</b>						
<b>AA: Iowa Non-MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (CT)	10	0.0	10.0	90.0	0.0	0.0
Population by Geography	30,608	0.0	20.3	79.7	0.0	0.0
Housing Units by Geography	13,672	0.0	17.6	82.4	0.0	0.0
Owner-Occupied Units by Geography	8,792	0.0	14.5	85.5	0.0	0.0
Occupied Rental Units by Geography	3,249	0.0	28.0	72.0	0.0	0.0
Vacant Units by Geography	1,631	0.0	13.7	86.3	0.0	0.0
Businesses by Geography	2,704	0.0	17.0	83.0	0.0	0.0
Farms by Geography	564	0.0	4.8	95.2	0.0	0.0
Family Distribution by Income Level	7,972	16.6	21.2	25.6	36.6	0.0
Household Distribution by Income Level	12,041	21.1	17.4	22.3	39.1	0.0
Median Family Income Non-MSAs - IA		\$61,681	Median Housing Value			\$98,211
			Median Gross Rent			\$573
			Families Below Poverty Level			7.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0%.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## **Scope of Evaluation in Iowa**

CFNB operates in one AA within the State of Iowa, the Iowa Non-MSA AA. The rating for the State of Iowa is solely based on a full-scope review of this AA.

## **LENDING TEST**

The bank’s performance under the Lending Test in Iowa is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Iowa Non-MSA AA is excellent.



## **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the State.

### ***Small Loans to Farms***

Refer to Table S in the state of Iowa 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 farms.

The geographic distribution of farm loans to geographies of different income levels is reasonable. The AA contains one moderate-income CT and no low-income CTs. Management did not originate any farm loans in the moderate-income CT. 2021 Dun & Bradstreet (D&B) data indicates 5 percent of AA farms are located in the moderate-income CT. Aggregate data indicates 4 percent of loans to farms within the AA were originated to farms in the moderate-income CT. There are few opportunities for agricultural lending in the moderate-income CT because a portion of the CT comprises the eastern portion of the town of Storm Lake.

### ***Consumer Loans***

Refer to Table U in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans to geographies of different income levels is excellent. The AA contains one moderate-income CT and no low-income CTs. Management originated 35 percent of consumer loans to borrowers located in the moderate-income CT. 2015 American Community Survey (ACS) data indicates 18 percent of households in the AA were located in the moderate-income CT.

## **Distribution of Loans by Income Level of the Borrower**

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

### ***Small Loans to Farms***

Refer to Table T in the state of Iowa 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 farms.

The distribution of loans to farms of different sizes within the AA is excellent. Management originated 85 percent of farm loans to farms with gross annual revenues (GAR) of \$1 million or less. Aggregate CRA data indicates 66 percent of farm loans within the AA were originated to farms with GAR of \$1 million or less. 2021 D&B data indicates 98 percent of AA farms reported GAR of \$1 million or less.

### ***Consumer Loans***

Refer to Table V in the state of Iowa section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels within the AA is excellent. Management originated 25 percent of consumer loans to low-income borrowers. 2015 ACS data indicates 21 percent of AA households are low-income. Management originated 40 percent of consumer loans to moderate-income borrowers. 2015 ACS data indicates 17 percent of AA households are moderate-income.

### **Responses to Complaints**

There were no complaints related to CFNB's CRA performance within the State of Iowa during the evaluation period.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Small farm and consumer loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not applicable	Not applicable	Not applicable
<b>List of AAs and Type of Examination</b>		
<b>Rating and AAs</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Iowa</b>		
Iowa Non-MSA AA	Full-scope	Counties of Buena Vista and Sac.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: THE CITIZENS FIRST NATIONAL BANK OF STORM LAKE	
Overall Bank:	Lending Test Rating:
The Citizens First National Bank of Storm Lake	Outstanding
State:	
Iowa	Outstanding

## Appendix C: Definitions and Common Abbreviations

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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/AA.

**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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. CTs 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- and moderate-income (LMI) individuals; community services targeted to LMI 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 GARs of \$1 million or less; or activities that revitalize or stabilize LMI 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 CT 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 an MSA 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 CT 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/AA.

**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 (MSA):** 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 MSA 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 MMSA. 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 MMSA, 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

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### Content of Standardized Tables

A separate set of tables is provided for each state. All MMSAs, 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 Federal Deposit Insurance Corporation (FDIC) and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table O. AA Distribution of Home Mortgage Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. AA 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 Q. AA 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. AA Distribution of Loans to Small Businesses by GAR -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. AA Distribution of Loans to Farms by Income Category of the Geography -** The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the



data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

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

Table S - AA Distribution of Loans to Farms by Income Category of the Geography																			2019-2021		
AA:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Iowa Non-MSA AA	20	2,538	100.0	614	0.0	0.0	0.0	4.8	0.0	4.1	95.2	100.0	95.9	0.0	0.0	0.0	0.0	0.0	0.0		
<b>Total</b>	<b>20</b>	<b>2,538</b>	<b>100.0</b>	<b>614</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>4.8</b>	<b>0.0</b>	<b>4.1</b>	<b>95.2</b>	<b>100.0</b>	<b>95.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

Table T - AA Distribution of Loans to Farms by GAR												2019-2021	
AA:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Iowa Non-MSA AA	20	2,538	100.0	614	98.1	85.0	65.5	0.9	15.0	1.1	0.0		
<b>Total</b>	<b>20</b>	<b>2,538</b>	<b>100.0</b>	<b>614</b>	<b>98.1</b>	<b>85.0</b>	<b>65.5</b>	<b>0.9</b>	<b>15.0</b>	<b>1.1</b>	<b>0.0</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%.

<b>Table U - AA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2019-2021</b>	
AA:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Iowa Non-MSA AA	20	187	100.0	0.0	0.0	18.2	35.0	81.8	65.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.*

<b>Table V - AA Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2019-2021</b>	
AA:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Iowa Non-MSA AA	20	187	100.0	21.1	25.0	17.4	40.0	22.3	15.0	39.1	20.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>187</b>	<b>100.0</b>	<b>21.1</b>	<b>25.0</b>	<b>17.4</b>	<b>40.0</b>	<b>22.3</b>	<b>15.0</b>	<b>39.1</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.*