



PUBLIC DISCLOSURE

September 22, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank in Port Lavaca
Charter Number **14821**

1101 Highway 35 Bypass South
Port Lavaca, Texas 77979

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a reasonable loan-to-deposit (LTD) ratio, a majority of loans in the assessment area (AA), a reasonable geographic distribution of loans, and a reasonable distribution of loans among individuals of different income levels and businesses of different sizes.

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. Our analysis included seven similarly situation community banks comparable in asset size. As of December 31, 2024, the bank’s quarterly average LTD ratio was 63 percent. The comparator banks quarterly average LTD ratio was 65 percent, ranging from a low of 40 percent and a high of 87 percent.

Lending in Assessment Area

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

The bank originated and purchased 82 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	193	78.8	52	21.2	245	43,610	68.1	20,467	31.9	64,077
Small Business	29	82.9	6	17.1	35	11,168	67.1	5,475	32.9	16,643
Consumer	36	100.0	0	0.0	36	1,117	100.0	0	0.0	1,117
Total	258	81.7	58	18.4	316	55,895	68.3	25,942	31.7	81,837

*Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

The First National Bank in Port Lavaca (FNB) is a full-service community bank headquartered in Port Lavaca, Texas. The main location includes a walk-in lobby, a drive-up motor bank, and an automated teller machine (ATM). There are three additional branches located in Seadrift, Port O'Connor, and Victoria, Texas with an ATM at each location. All locations were in middle-income census tracts (CT). Hours vary by location with extended hours offered at the Port Lavaca location.

As of December 31, 2024, FNB had total assets of \$378 million with a tier one leverage capital ratio of 11.35 percent. Net loans equaled \$214 million or 56 percent of total assets. The largest loan product by dollar volume was home mortgage at 248 percent of tier one capital. FNB offered a full range of consumer and commercial banking products and services. FNB also offered mobile and online banking, which allowed customers to obtain up to the minute account activity, transfer funds between accounts, pay bills, receive E-statements, and perform direct deposit.

There were no legal or financial circumstances impeding FNB's ability to meet the credit needs of the AAs. The bank was rated "Satisfactory" at the last CRA evaluation dated August 22, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test was January 1, 2022, through December 31, 2024. By dollar, the primary products were residential and commercial loans at 35 percent and 29 percent of total loan originations, respectively. By number, consumer lending was also a primary product at 60 percent of total loan originations. All three products were given equal weight.

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), if applicable 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. The only rating area was Texas.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and 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 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) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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 Texas

CRA rating for the State of Texas¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable geographic distribution of loans.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- No CRA-related consumer complaints.

Description of Institution's Operations in Texas

FNB has two AAs: the TX Non-MSA and the Victoria MSA. The TX Non-MSA included Calhoun County, which had eight CTs. There were six middle-income CTs, one upper-income CT, and one CT that was not assigned an income designation. The Victoria MSA included Victoria County, which had 25 CTs. There were two low-income CTs, seven moderate-income CTs, nine middle-income CTs, six upper-income CTs, and one CT that was not assigned an income designation. All but one location was in the TX Non-MSA, with the remaining branch in the Victoria MSA.

As of June 30, 2025, FNB held deposits totaling \$300 million, which represented a 10 percent market share. The bank is ranked third of 13 institutions within the bank's AAs. The largest depository institutions were Prosperity Bank and Wells Fargo Bank, N.A., which held a combined 65 percent market share.

Community Contacts

We identified a community contact that represented an organization that promoted economic development in the bank's AAs and surrounding areas. The contact stated that the area's economy was stable and had benefited from diversification into the oil, manufacturing, and medical industries and that local financial institutions were responsive to area credit needs and participated in community endeavors. According to the contact, opportunities for additional financial institution participation included small business, small farm, and home mortgage loans.

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

TX Non-MSA

Assessment Area(s) - TX Non-MSA 2024						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.00	0.00	75.00	12.50	12.50
Population by Geography	20,106	0.00	0.00	73.20	26.80	0.00
Housing Units by Geography	12,091	0.00	0.00	81.46	18.54	0.00
Owner-Occupied Housing by Geography	5,917	0.00	0.00	72.45	27.55	0.00
Occupied Rental Units by Geography	2,110	0.00	0.00	83.03	16.97	0.00
Vacant Units by Geography	4,064	0.00	0.00	93.75	6.25	0.00
Businesses by Geography	573	0.00	0.00	68.94	31.06	0.00
Farms by Geography	40	0.00	0.00	95.00	5.00	0.00
Family Distribution by Income Level	5,502	16.41	19.36	20.07	44.17	0.00
Household Distribution by Income Level	8,027	15.41	18.29	19.66	46.64	0.00
Unemployment rate (%)	4.30	0.00	0.00	4.59	3.58	0.00
Households Below Poverty Level (%)	9.06	0.00	0.00	9.52	7.65	0.00
Median Family Income (Non-MSAs - TX)		\$61,809			Median Housing Value	\$114,850
Median Family Income (Non-MSAs - TX) for 2024		\$75,500			Median Gross Rent	\$871
					Families Below Poverty Level	6.18
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						

Victoria MSA

Assessment Area(s) - Victoria MSA 2024						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	8.00	28.00	36.00	24.00	4.00
Population by Geography	91,319	5.68	26.24	39.30	28.78	0.00
Housing Units by Geography	37,264	5.56	26.26	39.37	28.81	0.00
Owner-Occupied Housing by Geography	21,872	5.07	20.34	40.32	34.28	0.00
Occupied Rental Units by Geography	10,648	5.65	37.08	37.37	19.90	0.00
Vacant Units by Geography	4,744	7.65	29.24	39.52	23.59	0.00
Businesses by Geography	3,432	3.85	31.12	35.43	29.43	0.17
Farms by Geography	158	0.63	18.99	36.71	43.67	0.00
Family Distribution by Income Level	22,172	22.55	17.40	19.00	41.06	0.00
Household Distribution by Income Level	32,520	25.12	14.98	17.63	42.27	0.00
Unemployment rate (%)	5.18	9.55	5.37	6.12	2.97	0.00
Households Below Poverty Level (%)	13.94	26.55	23.82	12.17	5.42	0.00
Median Family Income (47020 - Victoria, TX MSA)		\$71,697			Median Housing Value	\$119,900
Median Family Income (47020 - Victoria, TX MSA) for 2024		\$88,300			Median Gross Rent	\$939
					Families Below Poverty Level	11.44
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 Texas

The rating for Texas was based on full-scope reviews of the TX Non-MSA and the Victoria MSA.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the TX Non-MSA and the Victoria MSA was good.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the State. Examiners did not analyze the geographic distribution in the TX Non-MSA, as there were no low- or moderate-income geographies.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the Victoria MSA was reasonable. FNB did not originate any mortgage loans in low-income geographies, but the aggregate lending of all reporting institutions was minimal at 2 percent. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied housing units and exceeded the aggregate lending of reporting institutions.

Small Loans to Businesses

Refer to Table 9 in 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.

The geographic distribution of small business loans in the Victoria MSA was excellent. The percentage of business loans in both low- and moderate- income geographies exceeded the percentage of businesses and the aggregate lending of reporting institutions in those geographies.

Consumer Loans

Refer to Table 13 in 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 in the Victoria MSA was reasonable. FNB did not originate any consumer loans in low-income geographies but there were only two low-income geographies with a combined 2,072 households. The percentage of consumer loans in moderate-income geographies was near to the percentage of households in those geographies.

Lending Gap Analysis

We did not identify any unexplained conspicuous gaps.

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 of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

The distribution of home mortgage loans to individuals of different income levels was reasonable.

TX Non-MSA

The borrower distribution of home mortgage loans was reasonable. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate lending of reporting institutions. The percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but exceeded the aggregate lending of reporting institutions.

Victoria MSA

The borrower distribution of home mortgage loans was reasonable. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate lending of reporting institutions. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but near to the aggregate lending of reporting institutions.

Small Loans to Businesses

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

The distribution of small business loans to businesses of different sizes was reasonable.

TX Non-MSA

The borrower distribution of small business loans was reasonable. The percentage of small business loans was below the percentage of small businesses but exceeded the aggregate lending of reporting institutions.

Victoria MSA

The borrower distribution of small business loans was reasonable. The percentage of loans to small businesses was below the percentage of small businesses but exceeded the aggregate lending of reporting institutions.

Consumer Loans

Refer to Table 14 in 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 individuals of different income levels was reasonable.

TX Non-MSA

The borrower distribution of consumer loans was reasonable. The percentage of consumer loans to low-income borrowers was well below the percentage of low-income families. The percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income families.

Victoria MSA

The borrower distribution of consumer loans was reasonable. The percentage of consumer loans to low-income borrowers was below the percentage of low-income families. The percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income families.

Responses to Complaints

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, consumer loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
TX Non-MSA	Full-scope	Calhoun County
Victoria MSA	Full-scope	Victoria County

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
FNB Port Lavaca	Satisfactory
MMSA or State:	
State of Texas	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

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		
	#	\$	% 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
TX Non-MSA	155	34,963	80.31	996	--	--	--	--	--	--	72.45	83.87	77.41	27.55	16.13	22.49	--	--	--
Victoria MSA	38	8,648	19.69	4,286	5.07	--	2.01	20.34	18.42	17.83	40.32	52.63	41.60	34.28	28.95	38.54	--	--	--
Total	193	43,610	100.00	5,282	3.99	--	1.63	16.01	3.63	14.46	47.16	77.72	48.35	32.84	18.65	35.52	--	--	--

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		
	#	\$	% 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
TX Non-MSA	155	34,963	80.31	996	16.41	2.58	2.21	19.36	10.32	9.24	20.07	7.74	15.46	44.17	72.90	53.61	--	6.45	19.48
Victoria MSA	38	8,648	19.69	4,286	22.55	7.89	3.36	17.40	10.53	12.93	19.00	13.16	19.62	41.06	50.00	39.94	--	18.42	24.15
Total	193	43,610	100.00	5,282	21.33	3.63	3.14	17.79	10.36	12.23	19.21	8.81	18.84	41.67	68.39	42.52	--	8.81	23.27

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		
	#	\$	% 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
TX Non-MSA	23	5,820	53.49	621	--	--	--	--	--	--	68.94	100.00	69.08	31.06	0.00	30.92	--	--	--
Victoria MSA	20	7,065	46.51	3,456	3.85	5.00	4.92	31.12	45.00	26.22	35.43	20.00	37.12	29.43	30.00	31.74	0.17	--	--
Total	43	12,885	100.00	4,077	3.30	2.33	4.17	26.67	20.93	22.22	40.22	62.79	41.99	29.66	13.95	31.62	0.15	--	--

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%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022 - 2024

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
TX Non-MSA	23	5,820	53.49	621	75.74	60.87	57.49	10.12	34.78	14.14	4.35
Victoria MSA	20	7,065	46.51	3,456	75.17	55.00	50.95	11.25	35.00	13.58	10.00
Total	43	12,885	100.00	4,077	75.26	58.14	51.95	11.09	34.88	13.66	6.98

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%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022 - 2024

Assessment Area:	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
TX Non-MSA	26	506	55.32	--	--	--	--	75.23	84.62	24.77	15.38	--	--
Victoria MSA	21	857	44.68	5.26	--	25.82	23.81	39.35	42.86	29.57	33.33	--	--
Total	47	1,363	100.00	4.22	--	20.71	10.64	46.45	65.96	28.62	23.40	--	--

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

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2022 - 2024

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
TX Non-MSA	26	506	55.32	15.41	7.69	18.29	30.77	19.66	3.85	46.64	34.62	--	23.08
Victoria MSA	21	857	44.68	25.12	19.05	14.98	23.81	17.63	14.29	42.27	28.5	--	14.29
Total	47	1,363	100.00	23.20	8.51	15.64	6.38	18.03	27.66	43.13	38.30	--	19.15

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