Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

June 23, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bankers Trust Company, National Association
Charter Number: 14564

1201 Broadway
Quincy, Illinois 62301

Office of the Comptroller of the Currency

211 Fulton Street
Suite 604
Peoria, Illinois 61602

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.

Contents

Overall CRA Rating

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

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on the state of Illinois performance.
- The Community Development (CD) Test rating is based on the state of Illinois performance.
- The bank originates a majority of its loans within its assessment areas (AAs).
- The loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

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

First Bankers Trust Company's (FBTC's or bank's) quarterly average LTD ratio is 59.5 percent for the period from January 1, 2022, to December 31, 2024, with a quarterly low LTD ratio of 52.6 percent and a quarterly high LTD ratio of 64.1.

FBTC ranked 9th out of 10 similarly situated Federal Deposit Insured Corporation (FDIC) insured financial institutions that compete with the bank for deposits in the AAs. The comparable institutions range in asset size from $217.7 million to $3.9 billion and reported quarterly average LTD ratios ranging from 38.8 percent to 100.3 percent.

Lending in Assessment Area

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

The bank originated and purchased 75.7 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Small Business	53	75.71%	17	24.29%	70	8,341	70.74%	3,451	29.26%	11,791
Total	**53**	**75.71%**	**17**	**24.29%**	**70**	**8,341**	**70.74%**	**3,451**	**29.26%**	**11,791**
Source: 1/1/2022 - 12/31/2024 Bank Data *Due to rounding, totals may not equal 100.0%*										

Description of Institution

FBTC is an intrastate institution with assets of $1.2 billion as of December 31, 2024, and headquartered in Quincy, IL. The bank is wholly owned by First Bankers Trustshares, Inc., a single-bank holding company located in Quincy, IL. FBTC has no affiliates or subsidiaries.

FBTC's stated CRA mission is to continue to find ways to meet the needs of the community through its banking products and services and evolving those services to continue to meet the needs of the community into the future.

FBTC primarily originates loans in Illinois and offers a full range of products including agriculture, business, consumer installment, and home mortgage loans to meet customer needs within the AA. Please refer to the bank's public file for additional information on products and services offered.

The bank has one rating area with two legal AAs: the Springfield, IL MSA AA (Springfield MSA) and one Non-MSA AA (Non-MSA). The Non-MSA has eight branch locations and 14 automated teller machines (ATMs) serving Adams County, McDonough County, Hancock County, Schuyler County, and a portion of Pike County. The second AA is located within the Springfield MSA and includes Sangamon County, which is served with one branch and one ATM. All branches provide drive-thru access and offer banking services on Saturdays. Three of FBTC's ATMs within the Non-MSA are deposit taking. There were no branch openings or closings since the previous CRA evaluation. The bank did remove four ATMs from the Non-MSA due to lack of use in McDonough County. The bank continues to maintain a branch with an ATM within the county.

Commercial loans represent the largest product within the loan portfolio totaling $375.3 million or 59.6 percent per call report data as of December 31, 2024. This is followed by agricultural loans at $122.7 million or 19.5 percent, residential real estate loans at $72.9 million or 11.6 percent, and consumer loans at $59.4 million or 9.4 percent as of the same date. The bank originated 6,294 loans totaling $648.2 million between January 1, 2022, through December 31, 2024, per bank data. The bank is active in originating fixed rate residential loans with the intention of selling them into the secondary market.

The bank reported total net loans and leases of $621.1 million, which results in a net loans and leases to total assets ratio of 52.7 percent. The bank reported tier 1 leverage capital of $122.8 million, which results in a tier 1 leverage capital ratio of 9.6 percent, as of December 31, 2024

The previous CRA rating, which the OCC determined using the Intermediate Small Bank evaluation criterion, was satisfactory as detailed in the Performance Evaluation (PE) dated March 14, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covers the period from January 1, 2022, through December 31, 2024. We evaluated FBTC under the Intermediate Small Bank evaluation criterion, which includes a Lending Test and a CD Test.

The primary loan product for evaluation was business loans, representing 59.9 percent of total originations and purchases, by dollar, between January 1, 2022, and December 31, 2024.

The Lending Test evaluated loans originated or purchased between January 1, 2022, and December 31, 2024. Lending performance for business loans is based on a sample of loans originated or purchased, not the full population of data, and is considered in context, and was compared to 2024 Dunn & Bradstreet Small Business/Small Farm (SBSM) Demographics.

The CD Test evaluated eligible community development loans, investments, and services from January 1, 2022, to December 31, 2024.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the 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 based on the state of Illinois rating.

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 Illinois

CRA rating for the state of Illinois[1]: Satisfactory
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable performance.
- The geographic distribution of loans reflects excellent performance.
- The CD lending and CD services reflect excellent responsiveness while CD investments reflect adequate responsiveness.

Description of Institution's Operations in Illinois

FBTC serves its customers with two legal AAs; the Springfield MSA and the Non-MSA. The Non-MSA has eight branch locations and 14 automated teller machines (ATMs) serving Adams County, McDonough County, Hancock County, Schuyler County, and a portion of Pike County. The second AA is located within the Springfield MSA and includes Sangamon County, which is served with one branch and one ATM. All branches provide drive-thru access and offer banking services on Saturdays. Three of FBTC's ATMs within the Non-MSA are deposit taking. The bank also provides access to banking services through online and mobile banking platforms.

FBTC offers a full range of products including agriculture, business, consumer installment, and home mortgage loans to meet customer needs within the AA. The bank sources a majority of its deposits within the Non-MSA as the Non-MSA accounts for 93.0 percent compared to the Springfield MSA accounting for the remaining 7.0 percent.

Competition is high as the bank competes with national and state banks, credit unions, farm credit unions, and non-bank lenders. FBTC holds the highest deposit market share within the Non-MSA at 20.01 percent out of 30 FDIC insured financial institutions competing for $4.49 billion in deposits, as of 6/30/2024. The bank holds 0.8 percent deposit market share in the Springfield MSA, ranking 19 out of 24 financial institutions competing for $8.73 billion in deposits.

The annual unemployment rate for the state of Illinois increased over the span of January 1, 2022, through December 31, 2024. The annual unemployment rate for Illinois in 2022 was 4.6 percent, 4.5 percent in 2023, and 5.0 percent in 2024. The average unemployment rates for the counties included within the bank's AAs compare favorably to the average unemployment rate for the state of Illinois. The average annual unemployment rate for the counties of Adamas, Hancock, McDonough, Pike, and Schuyler under the Non-MSA increased but remained below the Illinois annual unemployment rate with an average unemployment rate of 4.0 percent for 2022, 4.2 percent for 2023, and 4.4 percent for 2024. The Springfield MSA, which includes only Sangamon County, saw a relatively stable annual unemployment rate with 4.3 percent for 2022, 4.4 percent for 2023, and 4.3 percent for 2024.

[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.

In the Non-MSA, there are two low-income census tracts and four moderate-income census tracts. The two low-income census tracts are located in downtown Quincy, Illinois and near Western Illinois University in Macomb, Illinois. The moderate-income census tracts are located in downtown areas of Quincy, Macomb, and Rushville, Illinois.

In the Springfield MSA, there are 10 low-income census tracts and 14 moderate-income census tracts. The low- and moderate-income (LMI) census tracts are centered around the downtown and eastern portion of Springfield.

Major employers in the Non-MSA include Quincy Public Schools, John Morrell, and McDonough District Hospital. Major employers in the Springfield MSA include The State of Illinois, Memorial Health Systems, and Hospital Sisters Health System.

For the Non-MSA, we reviewed one community contact interview performed in 2024 with a regional council of public officials. The contact noted the local economy to be stable and relies heavily on agriculture, transportation, and healthcare. Lingering effects from the COVID-19 pandemic are present but the contact noted the economy has rebounded. Unemployment has remained low due to large employers remaining in the area. The contact noted the community would benefit from financial literacy and flexible lending programs for consumers with personal finance challenges. The contact had no negative perceptions of the bank.

For the Springfield MSA, we reviewed one community contact interview performed in 2024 with a small business development center. The contact noted the economic outlook in the areas is positive, with a potential for a shortage in qualified workers rather than employment opportunities. The contact noted that housing costs have significantly increased and the inventory of homes for sale is limited. The contact noted the biggest need is for those with less than perfect credit to continue to receive access to credit and stated local financial institutions continue to meet this need. The contact had no negative perceptions of the bank.

Non-MSA

Assessment Area - Non-MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	41	4.88	9.76	60.98	21.95	2.44
Population by Geography	119,928	3.08	8.94	62.20	24.07	1.70
Housing Units by Geography	58,593	4.09	9.27	61.50	25.06	0.08
Owner-Occupied Housing by Geography	35,892	1.72	6.87	66.77	24.64	0.00
Occupied Rental Units by Geography	14,240	8.08	12.28	54.19	25.31	0.14
Vacant Units by Geography	8,461	7.43	14.41	51.45	26.42	0.30
Businesses by Geography	3,691	9.05	8.59	58.74	23.57	0.05
Farms by Geography	492	0.41	4.07	74.19	21.34	0.00
Family Distribution by Income Level	30,253	18.77	17.10	21.92	42.21	0.00
Household Distribution by Income Level	50,132	24.73	15.77	17.85	41.65	0.00
Unemployment rate (%)	5.68	7.95	4.76	4.81	6.66	29.15
Households Below Poverty Level (%)	13.84	41.75	16.52	11.03	16.04	70.00
Median Family Income (Non-MSAs - IL)		$67,835			**Median Housing Value**	$101,100
Median Family Income (Non-MSAs - IL) for 2024		$82,800			**Median Gross Rent**	$696
					Families Below Poverty Level	9.01

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

Springfield MSA

Assessment Area - Springfield MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	54	18.52	25.93	25.93	29.63	0.00
Population by Geography	196,343	13.10	20.75	28.93	37.22	0.00
Housing Units by Geography	91,952	14.60	23.43	30.07	31.90	0.00
Owner-Occupied Housing by Geography	58,861	7.88	19.46	31.92	40.73	0.00
Occupied Rental Units by Geography	25,232	28.04	29.24	26.92	15.80	0.00
Vacant Units by Geography	7,859	21.77	34.43	26.28	17.52	0.00
Businesses by Geography	7,664	13.10	23.04	21.83	42.03	0.00
Farms by Geography	400	7.50	10.50	40.50	41.50	0.00
Family Distribution by Income Level	50,068	23.83	15.81	20.80	39.57	0.00
Household Distribution by Income Level	84,093	25.12	15.92	16.94	42.02	0.00
Unemployment rate (%)	4.95	9.65	7.29	4.40	2.48	0.00
Households Below Poverty Level (%)	13.27	34.72	17.73	10.16	4.11	0.00
Median Family Income (44100 - Springfield, IL MSA)		$83,948			**Median Housing Value**	$117,500
Median Family Income (44100 - Springfield, IL MSA) for 2024		$105,600			**Median Gross Rent**	$832
					Families Below Poverty Level	9.69

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 Illinois

The Non-MSA and Springfield MSA both received full-scope reviews. The Non-MSA received a greater weight as it accounts for a significant majority of the bank's deposits. Please refer to Appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

Refer to Table 9 in the state of Illinois 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.

The distribution of business loans is reasonable.

Non-MSA:

The distribution of business loans reflects adequate distribution.

The proportion of lending in low-income geographies exceeded both the percentage of businesses in the AA and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies is less than both the percentage of businesses in the AA and the aggregate distribution of all reporting lenders.

Springfield MSA:

The distribution of business loans reflects adequate distribution.

The proportion of lending in low-income geographies is exceeded both the percentage of businesses in the AA and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies is less than both the percentage of businesses in the AA and the aggregate distribution of all reporting lenders.

Lending Gap Analysis

We performed a lending gap analysis that included a review of geocoded sampled business loans and compared the distribution to the AA maps and location of branches. We did not identify any unexplained conspicuous gaps in the bank's lending within the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table 10 in the state of Illinois 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.

The distribution of business loans reflects excellent distribution.

Non-MSA:

The distribution of business loans reflects excellent distribution.

The proportion of lending to small businesses exceeds both the percentage of small businesses in the AA and the aggregate distribution of all reporting lenders.

Springfield MSA:

The distribution of business loans reflects excellent distribution.

The proportion of lending to small businesses exceeds both the percentage of small businesses in the AA and the aggregate distribution of all reporting lenders.

Responses to Complaints

FBTC did not receive any complaints about its performance in helping to meet the needs of its AA.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibited excellent 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 AAs.

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.

Community Development Loans				
	Total			
Assessment Area	#	% of Total #	$(000's)	% of Total $
Non-MSA	19	73.08	14,085	83.51
Springfield MSA	7	26.92	2,782	16.49
Total	**26**	**100.00**	**16,867**	**100.00**

FBTC's CD lending performance represents excellent responsiveness in the full-scope areas.

The Non-MSA CD lending activity represents excellent responsiveness. The bank originated a total of 19 CD loans totaling $14.1 million, representing 12.33 percent of allocated tier 1 capital based on deposit allocation by AA. Of the 19 CD loans, 15 benefit community service and four benefit affordable housing.

Notable CD loans in the Non-MSA include:

- Three loans totaling $2.8 million to an organization providing trauma, special education, and foster and adoption services to LMI persons.
- Two loans totaling $877 thousand to an organization providing services to LMI persons including job training, employment stabilization to prevent recidivism, general education diploma classes, youth services including college and career programs, and parenting programs.
- Two loans totaling $300 thousand to an organization providing affordable childcare/daycare services to children of LMI parents.

The Springfield MSA CD lending activity represents excellent responsiveness. The bank originated a total of seven CD loans totaling $2.8 million, representing 32.5 percent of allocated tier 1 capital based on deposit allocated by AA. Of the seven CD loans, two benefit community service, one revitalizes or stabilizes a low-income geography, and four benefit affordable housing.

Notable CD loans in the Springfield MSA include:

- A $2.0 million dollar loan to support the targeted redevelopment blighted area under the Illinois Business Retail Development Program. The redevelopment supports the revitalizing and stabilization of a low-income geography and bring jobs to the area.

In addition to the AAs, the bank made 45 regional CD loans totaling $16.9 million, with 44 of these loans totaling $12.2 million benefiting affordable housing and one loan totaling $4.7 million for a start-up business receiving a New Markets Tax Credit. These activities received positive consideration in the overall CD loans test.

Number and Amount of Qualified Investments

Qualified Investments											
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Non-MSA	0	0	92	5,431	92	80.00	5,431	99.58	0	0
Springfield MSA	0	0	20	23	20	17.39	23	0.42	0	0
Broader Statewide or Regional Area	0	0	3	2	3	2.61	2	0.00	0	0
Total	0	0	115	5,456	115	100.00	5,456	100.00	0	0

FBTC's CD investment performance represents adequate responsiveness to the needs of its AAs.

The Non-MSA CD investment activity represents adequate responsiveness. The Non-MSA investments include five qualifying investments totaling $5.3 million and 87 cash donations totaling $117 thousand. CD investment activity in the Non-MSA represents 4.76 percent of allocated tier 1 capital based on deposit allocation by the AA as of December 31, 2024.

Notable CD investments and donations in the Non-MSA include:

- Three qualifying investments totaling $1.7 million for building improvements of schools that primarily serve LMI children.
- Four cash donations totaling $3 thousand benefiting an organization that provides mental health, foster, and adoption services to children of LMI persons.
- Three cash donations totaling $3 thousand benefiting a food pantry for LMI persons.

The Springfield MSA CD investment activity represents adequate responsiveness. The Springfield MSA investments include 10 cash donations totaling $23 thousand. CD investments in the Springfield MSA represent 1.0 percent of allocated tier 1 capital based on deposit allocation by the AA as of December 31, 2024.

Notable CD investments and donations in the Springfield MSA include:

- Two cash donations totaling $2 thousand benefiting an organization that provides food pantry services to LMI persons.
- Four cash donations totaling $5 thousand benefiting an organization that provides academic and social-emotional support programs, as well as providing food security to underserved, low-income students.
- Three cash donations totaling $3 thousand benefiting an organization benefiting LMI persons through housing services and assistance to homeless and at-risk families.

In addition to the AAs, the bank made three regional cash donations totaling $1,730 benefiting a food pantry and two organizations providing knowledge and job skills to LMI persons. These donations received positive consideration in the overall CD investment test.

Extent to Which the Bank Provides Community Development Services

FBTC's CD service performance represents excellent responsiveness to the needs of its AAs. FBTC employees provided 2,667 service hours, of which 2,090 of these hours were in leadership positions.

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

In the Non-MSA, CD service performance represents excellent responsiveness with 2,523 service hours, of which 1,998 of these hours were in leadership capacities.

Notable CD services in the Non-MSA include:

- Two bank officers providing a total of 96 service hours by serving as the President and Chairman of the Board for an organization that provides mental health services to LMI persons.
- One bank officer providing 60 service hours by serving as a director for an organization that promotes economic development and revitalization of LMI areas.
- One bank employee providing 80 service hours as a Board member for an organization that provides education on financial literacy and work readiness programs to LMI persons.

In the Springfield MSA, performance represents adequate responsiveness with 144 service hours, of which 92 of the hours were in leadership capacities.

Notable CD services in the Springfield MSA include:

- One bank employee provided eight service hours as a board member to an organization that provides academic and social-emotional support programs, as well as providing food security to underserved, low-income students.
- One bank officer provided 65 service hours as a board member to an organization providing healthcare to LMI persons.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the MSA and Non-MSA that received comprehensive examination review, designated by the term “full-scope.”

Time Period Reviewed:	Lending Test: January 1, 2022, to December 31, 2024 CD Test: January 1, 2022, to December 31, 2024	
Bank Products Reviewed:	Small Business, community development loans, qualified investments, community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Illinois		
Non-MSA	Full-scope	Adams County, Hancock County, McDonough County, Schuyler County, Portion of Pike County
Springfield MSA	Full-scope	Sangamon County

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
First Bankers Trust Company, NA	Satisfactory	Outstanding	Satisfactory
State:			
Illinois	Satisfactory	Outstanding	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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of $1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of 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 9. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because arrogate 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.

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	
Non-MSA	34	5,188	62.96	3,069	9.05	11.76	8.21	8.59	2.94	5.77	58.74	64.71	65.46	23.57	20.59	20.56	0.05	0.00	0.00	
Springfield MSA	20	4,914	37.04	6,043	13.10	25.00	10.89	23.04	10.00	18.29	21.83	25.00	22.79	42.03	40.00	48.04	0.00	0.00	0.00	
Total	54	10,102	100	9,112	11.78	16.66	9.99	18.34	5.55	14.07	33.83	50.00	37.16	36.03	27.78	38.78	0.02	0.00	0.00	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 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
Non-MSA	34	5,188	62.96	3,069	70.13	79.41	57.58	12.68	20.59	17.19	0.00
Springfield MSA	20	4,914	37.04	6,043	74.00	100.00	56.99	10.40	0.00	15.59	0.00
Total	54	10,102	100.00	9,112	72.70	87.04	57.19	11.17	12.96	16.13	0.00

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

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.