

**Erebor Bank, N.A.**  
**Columbus, Ohio**

**Community Reinvestment Act**  
**2026-2028 Strategic Plan**

**May 6, 2026**

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## 1. Introduction

### 1.1. Overview

Erebor Bank, National Association (the “Bank”), is a de novo national bank chartered by the Office of the Comptroller of the Currency (“OCC”) and granted deposit insurance by the Federal Deposit Insurance Corporation on February 6, 2026. The Bank’s mission is to address gaps in the banking sector by developing banking products and services focused on serving the innovation economy on a national scale. The Bank is organized as a national banking association with its main office located in Columbus, Ohio and administrative offices in New York, New York and Newport Beach, California. The Bank will not operate any physical branches.

As a federally insured depository institution, the Bank is subject to the Community Reinvestment Act (“CRA”). Enacted by Congress in 1977, the CRA requires regulated financial institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income (“LMI”) neighborhoods, consistent with safe and sound operations. The OCC, as the Bank’s primary federal regulator, is responsible for assessing the Bank’s record of meeting its obligations under the CRA.

Depository institutions are evaluated for CRA performance under tests applicable to their size and operations which may include a Lending Test, Investment Test, and Service Test.<sup>1</sup> Under 12 C.F.R. 25.27(a) and as defined in the OCC’s Community Reinvestment Act Examination Procedures: Examination Procedures for Institutions with Strategic Plans, an institution may elect to be evaluated for CRA under an approved CRA Strategic Plan. This approach allows an institution to propose measurable goals and activities, developed with public input, that demonstrate how it will meet its CRA obligations.

The Bank’s CRA Strategic Plan (the “Plan”) was developed in consultation with community stakeholders and is tailored to the Bank’s performance context and mission. The objectives of the Plan are to:

- Define how the Bank will serve the credit needs of its entire community, including LMI neighborhoods, within its designated Assessment Area.
- Establish a framework for evaluating and measuring the Bank’s performance in meeting its CRA goals.
- Provide the OCC with a clear basis for assessing the Bank’s record of meeting the credit needs of its communities in a manner consistent with safe and sound banking practices.

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<sup>1</sup> On April 7, 2025, the OCC issued OCC Bulletin 2025-5 (the “Bulletin”), which indicated that the OCC would continue to assess national banks’ CRA performance under the CRA final rule issued by the OCC in 2021 and directing OCC-supervised banks to refer to the 2022, 2023, or 2024 bound versions of Title 12 of the Code of Federal Regulations (or other sources containing the same regulatory text) for the effective version of the pertinent regulations. Consistent with the Bulletin, all references to the OCC’s regulations implementing the CRA contained in this plan reference the version of the OCC’s CRA regulations in effect as of March 29, 2024.

On July 18, 2025, the federal banking agencies, including the OCC, issued a notice of proposed rulemaking (the “Proposal”). 90 Fed. Reg. 34,086 (July 18, 2025). The Proposal would rescind the CRA final rule titled “Community Reinvestment Act” published in the Federal Register on February 1, 2024, and replace it with the agencies’ CRA regulations in effect on March 29, 2024 with certain conforming and technical amendments. The Bank will monitor developments related to CRA and update the Plan accordingly, if required.

## **1.2. Bank Profile**

The Bank's products and services are focused on supporting the innovation economy including technology companies focused on virtual currencies, artificial intelligence, defense, and manufacturing as well as payment service providers, investment funds and trading firms (e.g., registered investment advisers, broker-dealers, proprietary trading firms, and futures commission merchants). The Bank also serves select individual consumers who work for, or invest, in such companies, and provide certain deposit and payment services to qualifying foreign banking organizations.

The Bank offers credit products; deposit products; stablecoin-related services; and other services including data processing, treasury management, credit card issuance through bank-partnership arrangements, and payments services. The Bank does not provide any fiduciary custody activities.

## **1.3. Commitment to CRA**

The Bank is committed to supporting the credit and community development needs of its Assessment Area through community development loans and qualified investments, community development grants and donations, and community development services. These commitments reflect the goals and performance standards established in this Plan and will be carried out in a manner consistent with safe and sound banking practices and the objectives of the CRA.

## **1.4. Program Oversight and Resources**

The Bank's Board of Directors ("Board") and management are committed to maintaining a safe and sound compliance management system that supports the Bank's mission and the objectives of the CRA. The Board has reviewed and approved the Bank's Compliance Policy and will review and approve this Plan. The Board will receive quarterly reports on CRA performance, compliance metrics, and the adequacy of resources devoted to the program. The Board Risk and Compliance Committee ("BRCC") will assist the Board in providing oversight and in monitoring adherence to this Plan.

The President will be responsible for ensuring the Bank's lines of business and support functions operate in alignment with the Plan and sufficient operational resources are allocated to achieve its goals. The Chief Risk Officer ("CRO") will have ultimate executive responsibility for CRA compliance and will delegate to the Compliance Officer ("CO"), who also serves as the CRA Officer, the authority to manage and administer the CRA program on a day-to-day basis. The CO will oversee program implementation and coordination of CRA-related activities.

The Management Risk and Compliance Committee ("MRCC"), chaired by the CRO, will monitor adherence to the Plan, review performance results, and recommend adjustments as necessary. The Bank will integrate CRA monitoring into its broader Compliance Management System to ensure consistency with fair lending, consumer protection, and other regulatory compliance programs. The Chief Audit Officer will perform independent assessments of CRA-related activities as part of the Bank's internal audit plan. Audit findings and corrective actions will be tracked to completion and reported to the MRCC, the BRCC, and the Board. The Board and BRCC will periodically assess whether the staffing, systems, and financial resources dedicated to CRA compliance remain sufficient to achieve the goals and performance standards of this Plan.

## **2. CRA Strategic Plan Development**

Management considered all relevant factors in developing this Plan including the Bank's business plan, product offerings, financial projections, and competitive environment. Management also utilized a variety of data sources to assess demographic characteristics, economic conditions, and community development needs within the designated Assessment Area. This information, together with peer performance analysis

and feedback obtained through informal community engagement, informed the development of the Plan's measurable goals for community development lending and investments, grants and donations, and community services. In accordance with 12 C.F.R. 25.27(d), the Bank has also solicited public input and formally solicited public comment during the Plan's development process.

## **2.1. Public Input**

In accordance with 12 C.F.R. 25.27(d)(1) the Bank informally sought suggestions from members of the public during development of its initial draft CRA Strategic Plan. Management engaged community leaders and organizations representing affordable housing, homelessness and food security initiatives, small-business and entrepreneurship support, community services, education and workforce development, and other civic and economic development stakeholders within the Bank's Assessment Area.

On November 18, 2025, the Bank held a Community Outreach Forum in Columbus, Ohio with twenty-eight community leaders and representatives from a diverse range of organizations including affordable housing developers; homelessness and food security nonprofits; statewide and regional economic development entities; chambers of commerce; small-business and entrepreneurship support organizations; workforce and education institutions; and civic leadership groups. Senior Bank leadership, including the Chief Executive Officer, President, Chief Strategy Officer, Chief Risk Officer, and Chief Financial Officer participated in the forum and engaged with attendees.

During the forum, Bank management presented its preliminary Community Needs Assessment, which identified a number of challenges in the region including housing affordability and homelessness; hunger and food insecurity; gaps in access to healthcare, childcare, and education; and disparities in financial literacy. Community leaders shared perspectives on housing affordability and homelessness including the shortage of extremely low-income units, the fact that over 40% of people in shelters are employed, and that there were opportunities to leverage local partners to invest in affordable housing. Participants described the ongoing pressures contributing to hunger and food insecurity and identified ways the Bank could support food banks. In the area of healthcare, stakeholders emphasized the connection between healthcare, homelessness, and housing needs.

Community leaders also identified challenges related to childcare including cost barriers, staffing shortages, and the need for flexible childcare hours to support LMI families. In the career development discussion, participants emphasized the importance of skill development aligned with Ohio's workforce needs and the critical role that community colleges play in providing accessible career development. Stakeholders also described gaps in education in terms of quality and availability and encouraged collaboration with local education institutions. Participants noted support for LMI entrepreneurs and services for veterans as additional areas of community need.

In addition, community leaders suggested opportunities for collaboration with additional community organizations including economic- and community-development intermediaries, youth- and family-support organizations, and local educational institutions. Stakeholders also highlighted opportunities for Bank employees to provide financial education programming as part of the Bank's community development service activities.

The input gathered through this informal outreach informed the development of the initial draft CRA Strategic Plan. This outreach also resulted in the Bank identifying additional potential partnership opportunities and areas for ongoing community engagement to pursue as it implements its CRA responsibilities.

## **2.2. Public Notice**

Pursuant to 12 C.F.R. 5.8, the Bank published notice of its charter application on June 12, 2025 in the Columbus Dispatch, a newspaper of general circulation in the community in which the Bank proposes to engage in business. Members of the public were invited to submit written comments to the OCC within 30 days of the date of publication. The Bank has retained an affidavit from the Columbus Dispatch verifying this publication. The Bank is not aware of any public comments on its charter application received by the OCC.

Pursuant to 12 C.F.R. 25.27(d)(2), the Bank has formally solicited public comment on its proposed Plan by publishing a notice in the Columbus Dispatch, the same newspaper in which notice of its charter application was published. The notice was published on December 12, 2025, and no comments on the Plan were received by the Bank.

## **2.3. Term and Effective Date of the Plan**

The term of this Plan is three years, with a proposed effective date of May 6, 2026, or such other date as approved by the OCC. The fiscal year for measuring performance under this Plan will extend from January 1 to December 31 of each year during the Plan term.

## **2.4. Capacity and Constraints**

In developing this Plan and electing evaluation under the strategic plan option, the Bank considered the factors that may influence its capacity to provide community development lending, qualified investments, and services within its Assessment Area. The Bank faces no legal or regulatory restrictions on the types of CRA-qualifying activities it may conduct. However, the Bank's specialized business model and operating strategy shape the practical context in which it delivers community development activities, as described below.

### **2.4.1. Combined Community Development Lending and Investment Goals**

Consistent with 12 C.F.R. 25.27(f)(1), this Plan establishes combined measurable goals for community development lending and qualified investments. While the regulation generally contemplates that institutions will emphasize lending and lending-related activities, it expressly allows flexibility when "the emphasis of the plan is responsive to the characteristics and credit needs of the particular assessment area(s), considering the public comments and the institution's capacity, constraints, product offerings, and business strategy."<sup>2</sup> Accordingly, the Bank has established combined goals for community development lending and qualified investments as Goals #1 and #2 in Section 5 of this Plan, reflecting both quantitative and qualitative standards consistent with OCC evaluation criteria.

**Product Line Alignment and Approach to Community Development Lending.** The Bank's lending infrastructure and products are designed to serve innovation-economy businesses and qualified individuals through larger-balance commercial credit facilities secured by specialized collateral and supporting borrowers with regional, national, and international operations.

In contrast, community development lending within the Columbus Metropolitan Statistical Area typically involves small-balance loans, affordable-housing construction or rehabilitation financing, and microloans or working-capital facilities for community service organizations. Direct origination of these credits would require developing additional underwriting, servicing, and operational capabilities beyond the Bank's existing infrastructure.

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<sup>2</sup> OCC Comptroller's Handbook, Community Reinvestment Act, Examination Procedures, p. 100.

To support community development lending in a manner aligned with its business model and risk management framework, the Bank intends to participate in such lending through experienced intermediaries such as Community Development Financial Institutions (“CDFIs”) that already maintain the necessary underwriting and servicing capabilities. This approach enables the Bank to contribute to community development lending by pursuing opportunities sourced through qualified intermediaries.

**Intermediary Partnerships and an Investment-Driven Model for Greater Impact.** The Bank’s performance context analysis identified a robust community development ecosystem within the Columbus MSA including multiple CDFIs, Community Development Corporations (“CDCs”), nonprofit housing developers, and social service providers. These organizations have longstanding relationships in LMI communities and established expertise in originating, underwriting, and managing community development loans and projects.

By partnering with these intermediaries, the Bank can provide support through both community development loans (originated or participated in through CDFIs or similar partners) and qualified investments. Qualified investments, including equity investments, deposits, grants, and purchases of tax credit allocations, allow the Bank to deploy capital efficiently and at scale by leveraging the specialized capabilities and community reach of these organizations.

The following examples are illustrative of the types of community development impact that qualified investments may generate and do not represent commitments to specific transactions, organizations, or investment amounts. For example:

- A \$1 million investment in a CDFI loan fund can support \$8 to \$10 million in community lending through leverage.
- A \$500,000 Low-Income Housing Tax Credit (“LIHTC”) investment can help finance the development of approximately 40 to 60 affordable housing units.
- A \$250,000 grant to a community development venture fund can support multiple microloans and associated technical assistance services for entrepreneurs.

By combining strategic investments with lending partnerships facilitated through qualified intermediaries, the Bank maintains flexibility to respond to community development needs as opportunities arise.

**Geographic and Operational Considerations.** The Bank’s technology-driven delivery model enables broad reach but does not include branch locations within the Assessment Area, where community development lending often depends on locally-based, relationship-oriented engagement. Within the Columbus MSA, however, a strong network of CDFIs, CDCs, and nonprofit lenders is already positioned to provide this type of localized credit support. By directing capital through these established intermediaries, the Bank can contribute effectively to community development while remaining aligned with its operational strengths. This partnership-oriented approach allows the Bank to support community needs in a consistent, efficient, and sustainable manner.

**Responsiveness to Assessment Area Needs.** Based on the Bank’s assessment of community needs and its evaluation of the community development landscape within the Columbus MSA, investment capital remains a critical resource for expanding community development programs. Organizations such as the Affordable Housing Trust for Columbus and Franklin County, Freedom Equity, the Economic and Community Development Institute, and the Ohio Capital Finance Corporation are established intermediaries that deploy flexible financing to support affordable housing, small business growth, and broader community development initiatives.

Direct community development lending by the Bank would intersect with the same borrower segments and project types served by these organizations, which already operate effective, relationship-based lending platforms tailored to local needs. By focusing on targeted investments in these established intermediaries, and on lending partnerships facilitated through them, the Bank can help expand their capacity and address persistent capital gaps while leveraging their specialized infrastructure, underwriting expertise, and community partnerships.

**Regulatory Precedent.** The OCC has approved CRA Strategic Plans for financial institutions with specialized or non-traditional business models, including institutions with limited retail lending or retail deposit operations. Institutions such as Varo Bank, N.A., Bancorp Bank, N.A., Pathward, N.A., Green Dot Bank, Nelnet Bank, WebBank, and Medallion Bank operate under approved plans in which CRA performance is evaluated primarily through qualified investments, community development grants, and other measurable community development activities that align with each institution’s capacity, business strategy, and risk profile. Notably, Bancorp Bank, N.A. received an Outstanding CRA rating based on exceptional performance in community development investments, grants, and related activities. This reflects OCC standards that allow nontraditional institutions to demonstrate strong CRA performance through impactful community development activities when direct lending is limited by the institution’s business model.

**Commitment to Lending When Opportunities Arise.** While qualified investments will serve as the primary mechanism for achieving the Bank’s lending and investment goals, the Bank is committed to originating or participating in community development loans when appropriate opportunities are identified. To support this commitment, the Bank will ensure that community development loans and qualified loan participations constitute at least 10% of total new CRA Community Development Loans and Investments in each Plan year (Goal #1, Section 5.2.1). All lending will be conducted in accordance with safe and sound banking practices and the Bank’s credit policies.

The Bank will pursue community development lending opportunities that arise through qualified intermediaries, as well as other opportunities that are consistent with its capabilities and credit policies. Lending may include participations, intermediary-facilitated structures, or other community development loans that fit within the Bank’s operational model and expertise. Lending undertaken in this manner will complement the Bank’s broader investment strategy and support the effectiveness of its community development program.

Together, the lending and investment goals provide a balanced and practical approach to supporting affordable housing, small-business development, and community services within the Columbus MSA. This structure enables the Bank to direct meaningful capital into community development activities while maintaining an appropriate level of direct lending.

**Competition.** The Columbus MSA includes a large number of depository institutions, including several regional and national banks, that actively pursue similar CRA-qualified opportunities. This level of competition can limit the availability of new community development loans and investments within the Assessment Area. The Bank will actively work with community development intermediaries and partners to identify and support qualifying activities that address the needs of low- and moderate-income individuals and communities.

#### **2.4.2. Employee Locations**

Some Bank employees will reside outside the Assessment Area including those working in administrative offices in New York, New York, and Newport Beach, California, as well as remote staff. Recognizing this geographic distribution, the Bank will promote meaningful engagement in community development

services through a combination of virtual volunteer opportunities serving the Assessment Area and local activities in the Assessment Area.

### **2.4.3. Economic Factors**

Economic conditions, whether regional or national, may influence the availability and timing of qualified community development lending and investment opportunities that meet safety and soundness standards. Management will monitor economic trends, periodically review CRA performance, and make adjustments (subject to OCC consultation and approval under 12 C.F.R. 25.27(h)) if sustained market conditions materially affect the Bank's ability to achieve Plan goals. These considerations have been incorporated into the quantitative goals and qualitative performance standards outlined in Section 5 of this Plan.

## **3. Assessment Area**

### **3.1. Description**

The Community Reinvestment Act and its implementing regulation require each bank to delineate one or more Assessment Areas within which the OCC evaluates the institution's record of helping to meet the credit needs of its communities (12 C.F.R. 25.41). A bank's assessment area must include the geographies in which the bank has its main office, its branches, and its deposit-taking ATMs, as well as the surrounding geographies in which the bank has originated or purchased a substantial portion of its loans (12 C.F.R. 25.41(c)(2)).

The Bank has designated the Columbus, Ohio MSA, which is the location of its main office, as its single Assessment Area. The Columbus MSA consists of ten contiguous counties in central Ohio: Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union Counties.

Consistent with its digital business model, the Bank operates without physical branches, deposit-taking ATMs, or cash services. The Bank's administrative offices in New York, New York, and Newport Beach, California will not accept deposits or provide retail services and are therefore excluded from the delineated Assessment Area.

The Bank will meet its CRA obligations primarily through community development lending, investments, and services conducted within the Columbus MSA, supported by digital delivery channels and relationship-based outreach designed to address the credit needs of its Assessment Area consistent with safe and sound operations.

### **3.2. Demographic Information**

Consistent with 12 C.F.R. 25.21(b) and 12 CFR 25.41, the Bank analyzed demographic and economic characteristics of its designated Assessment Area using 2023 Federal Financial Institutions Examination Council (FFIEC) Census Data.<sup>3</sup> The Columbus MSA comprises 10 counties and 516 census tracts of which 62 (12%) are low-income, 123 (24%) are moderate-income, 175 (34%) are middle-income, 147 (28%) are upper-income, and 9 (2%) have no income designation due to nominal population. The Assessment Area covers 4,797 square miles and has a population of approximately 2.1 million people. There are no census tracts designated as distressed or underserved within the Columbus MSA.

A total of 111 census tracts (22%) are majority-minority tracts, with 107 of these located in Franklin County. Table 1 provides a summary of key demographic indicators for the Assessment Area. The data show that low-income tracts represent a smaller portion of the population and housing base, while

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<sup>3</sup> Federal Financial Institutions Examination Council, 2023 Census Data, Columbus, OH MSA.

moderate-income tracts are more prevalent. Overall, approximately 28% of residents, families, or households in the Assessment Area are classified as low- or moderate-income.

As shown in Table 2, approximately 88% of the population resides in Franklin, Delaware, Licking, and Fairfield Counties, which also contain the vast majority of LMI census tracts. LMI tracts are concentrated in the urban core of Columbus and extend east and south into Licking and Fairfield Counties.

The demographic composition of the Columbus MSA reflects a diverse and growing regional economy with significant LMI and majority-minority populations concentrated in the metropolitan center. These demographic patterns inform the Bank’s CRA strategy by directing community development lending, investment, and service efforts toward neighborhoods and organizations serving LMI households and minority communities within Franklin and adjacent counties.

<b>Table 1: Select Demographic Information for the Assessment Area</b>						
<b>Demographic Characteristic</b>	<b>#</b>	<b>Low</b>	<b>Moderate</b>	<b>Middle</b>	<b>Upper</b>	<b>Unknown</b>
Census Tracts	516	12.02%	23.84%	33.91%	28.49%	1.74%
Population	2,138,926	9.08%	21.65%	35.08%	32.79%	1.41%
Families	509,959	7.46%	21.23%	36.35%	34.51%	0.45%
Households	805,628	9.13%	22.74%	36.41%	30.95%	0.78%
Housing Units	869,406	9.93%	23.15%	36.03%	30.00%	0.89%
Owner-Occupied Housing Units	497,802	4.49%	18.60%	38.71%	37.97%	0.23%
Renter-Occupied Units	307,826	16.62%	29.43%	32.68%	19.60%	1.67%
Vacant Units	63,778	20.10%	28.34%	31.23%	18.01%	2.31%

<b>Table 2: Population and Census Tracts by County</b>						
<b>County</b>	<b>Population</b>	<b>Low</b>	<b>Moderate</b>	<b>Middle</b>	<b>Upper</b>	<b>Unknown</b>
Franklin	1,323,807	57	79	98	86	8
Delaware	214,124	0	2	9	29	0
Licking	178,519	2	10	21	13	0
Fairfield	158,921	1	11	15	9	0
Union	62,784	0	1	6	6	0
Pickaway	58,539	1	5	7	2	1
Madison	43,824	0	1	10	1	0
Perry	35,408	1	6	2	0	0
Morrow	34,950	0	4	4	1	0
Hocking	28,050	0	4	3	0	0
<b>Total</b>	<b>2,138,926</b>	<b>62</b>	<b>123</b>	<b>175</b>	<b>147</b>	<b>9</b>

### **Gross Rent, Median Income, and Housing Values**

Consistent with 12 C.F.R. 25.21(b) and 12 CFR 25.41, the Bank evaluated housing, income, and affordability trends within its designated Assessment Area to better understand community credit needs and potential constraints to affordable housing. Data were derived from the U.S. Census Bureau, American Community Survey (“ACS”) 1-Year Estimates, 2019 – 2023 and show that there were substantial housing-cost increases in the Columbus, Ohio MSA over this period.

Gross rents within the Columbus MSA have risen sharply over the past several years. In 2019, only 11.2% of occupied units had gross rents exceeding \$1,500 per month; by 2023, this share had climbed to 31.8%.<sup>4</sup> Rising rents indicate increasing pressure on renter households, particularly those with low or moderate incomes.

Similarly, the median housing value in the Columbus MSA increased by 69% between 2019 and 2023, compared with a 42% increase nationally. Median household income rose more slowly during this period, contributing to declining housing affordability and limited access to homeownership for many LMI households.

The housing-affordability ratio, defined as median household income divided by median housing value, illustrates the growing affordability gap. A lower ratio signifies less affordable housing. Although the Columbus MSA remains slightly more affordable than the national average, the decline in this ratio indicates faster deterioration in affordability locally.

The rapid rise in housing costs across the Columbus MSA is outpacing income growth and increasing rent burdens for LMI households. These trends underscore a significant community need for affordable rental housing, homebuyer assistance, and preservation of existing affordable units. Consistent with its Plan, the Bank will prioritize community-development lending, investments, and partnerships that expand affordable-housing opportunities and support housing-related nonprofit organizations and CDFIs operating within the Assessment Area.

<b>Table 3: Housing Affordability Ratio for Columbus MSA<sup>5</sup></b>			
<b>ACS Data Source</b>	<b>Median Household Income</b>	<b>Median Housing Value</b>	<b>Housing Affordability Ratio</b>
2023: ACS 1-Year Estimates	\$77,390	\$312,900	24.7%
2022: ACS 1-Year Estimates	\$75,777	\$289,200	26.2%
2021: ACS 1-Year Estimates	\$71,839	\$254,700	28.2%
2019: ACS 1-Year Estimates	\$67,207	\$184,800	36.4%

<b>Table 4: Housing Affordability Ratio for United States<sup>6</sup></b>			
<b>ACS Data Source</b>	<b>Median Household Income</b>	<b>Median Housing Value</b>	<b>Housing Affordability Ratio</b>
2023: ACS 1-Year Estimates	\$77,719	\$340,200	22.8%
2022: ACS 1-Year Estimates	\$74,755	\$320,900	23.2%
2021: ACS 1-Year Estimates	\$69,717	\$281,400	24.8%
2019: ACS 1-Year Estimates	\$65,712	\$240,500	27.3%

<sup>4</sup> U.S. Census Bureau, American Community Survey 1-Year Estimates, Table DP04: Selected Housing Characteristics, Columbus, OH Metropolitan Statistical Area, 2023.

<sup>5</sup> U.S. Census Bureau. American Community Survey 1-Year Estimates, Table S1903: Median Income in the Past 12 Months (in 2023 Inflation-Adjusted Dollars); and Table B25077: Median Value (Dollars), Columbus, OH Metropolitan Statistical Area, 2019 – 2023.

<sup>6</sup> Ibid.

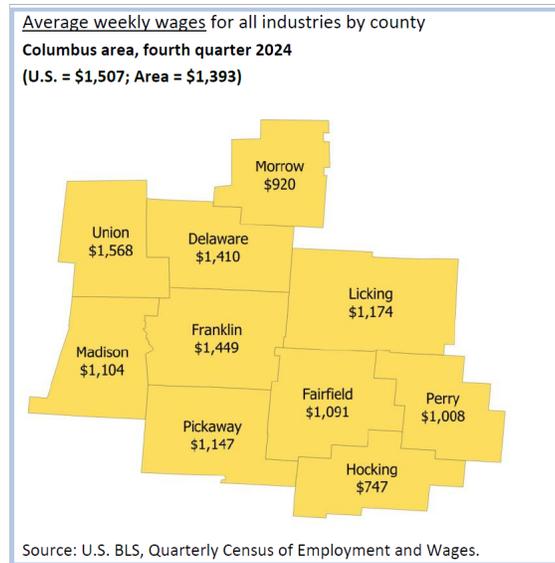
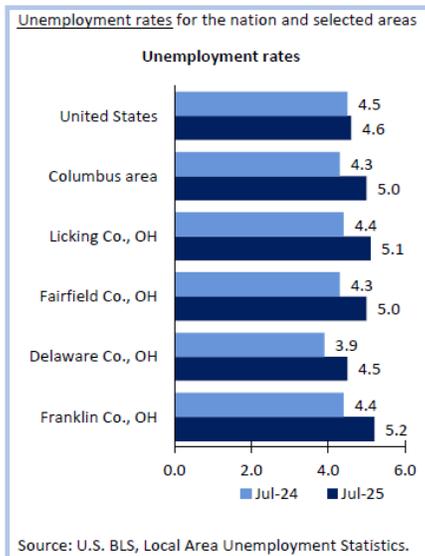
### 3.3. Economic Conditions and Characteristics

Consistent with 12 C.F.R. 25.21(b) and 12 CFR 25.41, the Bank reviewed economic conditions and labor-market characteristics within the Columbus MSA to understand local opportunities and constraints affecting credit needs and community-development activity. Data were obtained from the U.S. Bureau of Labor Statistics (“BLS”) and the U.S. Bureau of Economic Analysis (“BEA”).<sup>7,8</sup>

The unemployment rate for the Columbus MSA was 5.0% in July 2025, which is above the national rate of 4.6% and up from 4.3% a year earlier. Average weekly wages in the Assessment Area are below the U.S. average, although Union, Franklin, and Delaware Counties report the highest wage levels within the region. These counties benefit from concentrations of technology, logistics, and professional-services employers that support higher-wage job opportunities. According to the BEA 2022 County-Level Employment and Earnings Data, proprietors account for approximately 23% of total employment, while wage-and-salary employment represents 77%. Farm employment remains nominal across the MSA, comprising less than 1% of total employment.

Employment in the Columbus MSA is diversified, with the majority of jobs in sectors that drive regional growth and household stability. As shown in the table below, Trade, Transportation, and Utilities; Government; Professional and Business Services; and Education and Health Services together account for approximately 68% of total wage-and-salary employment. This industry mix supports a relatively stable labor base but also indicates vulnerability for lower-wage workers concentrated in retail, hospitality, and healthcare support occupations.

The Columbus MSA economy is resilient but characterized by uneven wage growth and geographic variation in employment stability. Service-sector dependence and wage disparities contribute to pockets of higher unemployment and limited access to credit among LMI residents.



<sup>7</sup> U.S. Bureau of Labor Statistics, Columbus Ohio Area Economic Summary, September 2025.

<sup>8</sup> U.S. Bureau of Economic Analysis, Ohio County Indicators: BEA Employment by Type and Sector, Table CAEMP25N: Total Full-Time and Part-Time Employment by NAICS Industry, 2022.

<b>Table 5: Employment by Industry for Columbus, Ohio Metropolitan Area as July 2025</b>		
<b>Industry</b>	<b>Employment (Thousands)</b>	<b>Percent of Total Employment</b>
Mining, Logging, and Construction	59.6	5.0%
Manufacturing	77.0	6.4%
Trade, Transportation, and Utilities	221.0	18.5%
Information	18.1	1.5%
Financial Activities	82.5	6.9%
Professional and Business Services	198.8	16.6%
Education and Health Services	182.7	15.3%
Leisure and Hospitality	116.4	9.7%
Other Services	46.5	3.9%
Government	192.5	16.1%

**Economic Projections**

In evaluating future performance context, the Bank reviewed macroeconomic forecasts from the Federal Reserve’s September 2025 Summary of Economic Projections.<sup>9</sup> These projections outline expected trends in national economic indicators that may influence lending demand, investment opportunities, and community development activity within the Bank’s Assessment Area.

The Federal Reserve’s restrictive monetary policy during 2022–2024 contributed to a moderation in inflation. In 2025, the Federal Reserve began gradually reducing the federal funds rate, and additional modest adjustments are projected over the forecast horizon. According to these projections, while some slowing in economic activity is possible, unemployment is expected to remain relatively stable, and inflation is expected to moderate over time, although uncertainty remains. Overall, the outlook appears consistent with moderate national and regional economic growth. These trends suggest continuing credit demand and opportunities for community development lending and investment, consistent with safe and sound operations.

The Bank’s CRA performance goals incorporate flexibility to adapt to changing economic conditions. If conditions diverge materially from baseline expectations, the Bank may adjust the pacing of CRA activities, in consultation with the OCC, to ensure goals remain achievable and aligned with prevailing conditions.

<b>Table 6: FOMC Economic Projections</b>			
<b>Indicator</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>
Change in Real GDP	1.6%	1.8%	1.9%
Unemployment Rate	4.5%	4.4%	4.3%
PCE Inflation	3.0%	2.6%	2.1%
Core PCE Inflation	3.1%	2.6%	2.1%

<sup>9</sup> Federal Reserve, Summary of Economic Projections, September 17, 2025.

Federal Funds Rate	3.6%	3.4%	3.1%
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### 3.4. Market and Competitive Factors

The banking environment in the Columbus MSA is highly competitive. According to the FDIC’s 2025 Ohio State Profile (derived from its Summary of Deposits data as of June 30, 2025), 51 depository institutions operated in the Columbus MSA with a combined deposit base of approximately \$118.6 billion.<sup>10</sup>

This strong banking presence reflects a healthy financial-services market but also creates significant competition for community development loans and investments. Larger regional and national institutions often maintain well-established community partnerships and may already support a substantial portion of the CRA-qualified opportunities within the Assessment Area.

As a de novo national bank, the Bank recognizes that it will initially have a limited market presence and will build community relationships and CRA-eligible pipelines over time. The Bank will engage proactively with community organizations, economic development agencies, and public-sector partners to identify unmet credit and investment needs within the Assessment Area, particularly those affecting low- and moderate-income individuals and geographies.

## 4. Community Needs Assessment

### 4.1. Housing Affordability

Affordable housing remains in short supply throughout the Columbus MSA affecting the ability of individuals and families to secure housing that aligns with their financial resources.

- Statewide data show a widening gap between rental needs and affordable supply for Ohio’s lowest-income households. According to the Ohio Housing Finance Agency’s Fiscal Year 2026 Ohio Housing Needs Assessment, more than 706,000 very low-income renters in Ohio have incomes at or below 50% of area median income, but only about 503,000 rental homes are affordable and available to them, leaving a shortage of over 202,000 units. The report shows this gap has widened by more than 62,000 units since 2019, underscoring persistent and growing affordability challenges for the state’s lowest-income renters.
- According to the National Low Income Housing Coalition’s 2025 Gap Report, Columbus has only 25 affordable and available rental units per 100 extremely low-income households, a ratio that is lower than those reported for Cincinnati (37 per 100) and Cleveland (39 per 100).
- The City of Columbus’s 2024 HUD Annual Action Plan identifies affordable housing as one of the city’s highest-priority community needs, noting that Columbus does not have enough affordable housing to meet current demand and that the private market is not producing a sufficient volume of affordable rental units.
- In the 2023 Central Ohio Veteran and Family Needs Assessment Final Report, low-income Veterans (household income less than \$50,000) reported higher need for economic assistance including help with their rent or mortgage, help finding work, and help with housing and housing security.

### CRA Plan Implications

Housing affordability pressures across the Assessment Area point to a need for community development activities that support affordable housing. The Bank can help address this need through:

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<sup>10</sup> Federal Deposit Insurance Corporation, Summary of Deposits: Ohio State Profile, as of June 2025.

- Community development loans supporting the construction or rehabilitation of affordable multifamily rental housing;
- Qualified investments in LIHTC projects and community land trusts; and
- Community development services through partnerships with nonprofit housing organizations and local public agencies addressing homelessness prevention and financial education for renters.

#### **4.2. Homelessness**

The number of individuals and families experiencing homelessness continues to rise across the Columbus MSA driven in part by ongoing housing affordability challenges and limited access to supportive housing resources.

- According to the January 2025 Point-in-Time Count conducted by the Community Shelter Board, there were 2,556 people experiencing homelessness in Franklin County, representing a 7.4% increase over the 2024 count.
- Based on the 2024 Columbus and Franklin County Comprehensive Community Assessment Final Report prepared for the Community Shelter Board, average shelter stays have increased from 49 to 69 days since 2015, while successful exits to permanent housing have fallen from 32% to 18%.
- In the 2023 Central Ohio Veteran and Family Needs Assessment Final Report, Veteran Service Organizations identified the top gap in services in central Ohio as Housing and Homelessness. There were 589 Veterans experiencing homelessness in Ohio in 2024 according to the 2024 Annual Homelessness Assessment to Congress.

#### **CRA Plan Implications**

The prevalence of homelessness in the Assessment Area underscores the need for community development initiatives to expand access to stable and affordable housing. The Bank can help address this need through:

- Community development loans supporting permanent supportive housing or transitional housing projects;
- Qualified investments in nonprofit housing developers, community land trusts, and social enterprises providing services to unhoused individuals; and
- Community development services such as financial education, technical assistance, or board participation with local housing and social-service organizations.

#### **4.3. Hunger and Food Insecurity**

Food insecurity continues to affect households across the Columbus MSA with many individuals and families unable to consistently access sufficient and nutritious food. LMI households are especially impacted due to competing costs for food, housing, healthcare, and transportation.

- The Hunger in Ohio 2024 study by the Ohio Association of Foodbanks reports that households experiencing food insecurity frequently faced tradeoffs between food and other essentials, including 72.5% choosing between food and rent or mortgage payments, 57.8% choosing between food and medical care, and 49.5% choosing between food and utilities.
- Based on 2023 data from Feeding America's Map the Meal Gap report, Franklin County had 199,410 food-insecure individuals with a food insecurity rate of 15.1%.

- The Mid-Ohio Food Collective’s 2024 Impact Report indicated that 2024 was the busiest year in its 45-year history with eastern Ohioans seeking assistance more than 1.8 million times, which was a 57% increase over 2020.

**CRA Plan Implications**

Food insecurity in the Assessment Area underscores the need for community development efforts that expand access to nutritious food for LMI residents. The Bank can help address this need through:

- Community development loans or qualified investments supporting food banks, community pantries, and organizations expanding food distribution capacity;
- Financing of community facilities that incorporate food access components such as mobile markets or shared-use kitchens in LMI neighborhoods; and
- Community development services, including employee volunteerism, board participation, and financial management training for nonprofit food providers.

**4.4. Healthcare and Mental Health Access**

Access to affordable and quality healthcare, including mental and behavioral health services, remains limited across the Columbus MSA, particularly among low- and moderate-income households.

- A 2024 survey of more than 1,600 Ohio adults by Altarum found that 67% delayed or went without healthcare due to cost in the previous twelve months. Research also shows that more than one in five adults with limited public transit access forgo healthcare because of transportation barriers, which are factors known to interfere with access to health services.
- The HealthMap2025 Community Health Assessment identifies mental health as a priority need and reports significantly higher rates of loneliness and depressive disorders among populations with incomes at or below the federal poverty level. The report further notes that hospitalizations due to self-harm and deaths from suicide have increased since the prior assessment.
- The Alcohol, Drug, and Mental Health Board’s 2024 Community Needs Assessment identifies anxiety, depression, and trauma as widespread concerns in Franklin County, with 67% of adults reporting anxiety and 52% reporting depression within the past year. Lower-income residents face disproportionately higher rates of PTSD and more barriers to care, including cost, long wait times, provider shortages, lack of awareness of services, and transportation barriers.

**CRA Plan Implications**

The gaps in healthcare and mental health access within the Assessment Area indicate a need for community development activities that expand affordable, community-based care for LMI residents. The Bank can help address this need through:

- Community development loans supporting the construction, renovation, or expansion of community health centers, behavioral health clinics, or substance-use treatment facilities that primarily serve LMI populations;
- Qualified investments in nonprofit health and social-service organizations improving access to care or providing preventive health education in LMI communities; and
- Community development services, such as financial education for patients or administrative support for nonprofit health partners.

#### **4.5. Childcare and Early Education**

Affordable, high-quality childcare and early education are not consistently available across the Columbus MSA, especially for LMI families.

- According to the 2024 Action for Children Central Ohio Child Care Provider Survey, child care providers identify affordability as the primary enrollment barrier for families and additional obstacles include transportation limitations and the hours of care needed. Financial strain is widespread among providers with 55% of programs reporting that their monthly revenue does not cover operating expenses. As a result of staffing and financial constraints, programs are operating at only 66% of their licensed capacity, and if fully staffed, could serve an additional 9,604 children across Central Ohio.
- According to a 2025 statewide voter poll conducted for Groundwork Ohio, childcare access and affordability are major barriers to workforce participation: 56% of Ohio parents report they would consider entering the workforce if quality childcare were available.

#### **CRA Plan Implications**

Limited access to affordable, high-quality childcare in the Assessment Area underscores the need for community development activities that support economic mobility and enable workforce participation for LMI individuals. The Bank can help address this need through:

- Community development loans for the construction, renovation, or expansion of licensed childcare centers serving LMI families;
- Qualified investments in nonprofit childcare operators, early education funds, or community foundations focused on expanding affordable childcare access; and
- Community development services, including financial literacy programs for childcare operators or participation on boards of organizations providing early childhood education to LMI families.

#### **4.6. Education and Career Development**

Across the Columbus MSA, disparities in educational performance and access to career-technical education resources remain pronounced, especially for LMI students and those attending schools in urban neighborhoods.

- According to the Ohio Department of Education and Workforce’s 2024–2025 School Report Card, Columbus City Schools, the largest district in the Assessment Area, received an overall rating of two stars (“Needs support to meet state standards”) and received one- and two-star ratings Early Literacy, Graduation, Achievement, Progress, and Gap Closing.
- The Ohio Department of Education and Workforce’s 2023 Statewide Career-Technical Education (“CTE”) Equity Report finds that female students, students of color, English learners, economically disadvantaged students, students with disabilities, homeless students, and foster youth are underrepresented in CTE programs compared to statewide enrollment. The report also finds that economically disadvantaged students and other special populations participate in work-based learning at substantially lower rates and have lower technical skill-attainment scores than statewide averages.

#### **CRA Plan Implications**

Gaps in educational, vocational training, and workforce development resources across the Assessment Area point to a need for expansion of educational and training facilities as well as strengthening of related programs that serve LMI communities. The Bank can help address this need through:

- Community development loans to finance or enhance facilities used for vocational training centers, workforce development programs, or early education initiatives;

- Community development services, such as employee volunteerism, mentorship, or financial literacy instruction through partnerships with local schools and workforce organizations.

#### **4.7. Financial Literacy and Financial Education**

Across the Columbus MSA, limited access to financial literacy and financial education continues to affect individuals and families, particularly those in LMI communities, and gaps in financial knowledge remain significant.

- According to the 2024 FINRA National Financial Capability Study, adults in Ohio answered an average of 3.2 out of 6 questions correctly on basic financial knowledge. This mirrors national results and reflects persistent gaps in understanding inflation, interest, and risk.
- In 2021, Ohio enacted Senate Bill 1, requiring students entering ninth grade after July 1, 2022, to complete a half-credit financial literacy course as a condition of high school graduation. However, adults and out-of-school youth, especially those not enrolled in traditional education pathways, continue to have limited access to structured financial education opportunities.
- According to the FDIC 2023 National Survey of Unbanked and Underbanked Households, nearly one in four households without a high school diploma (23.1%) were underbanked, compared with just one in ten households with a college degree (10.4%). This disparity indicates knowledge and reduced exposure to financial education may be linked to reduced participation in the mainstream banking system.

#### **CRA Plan Implications**

Gaps in financial education across the Assessment Area highlight the need for community development activities that expand financial literacy instruction, strengthen nonprofit capacity, and integrate financial capability into broader economic-mobility efforts for LMI individuals. The Bank can help address this need through:

- Providing financial education and literacy training in schools, workforce programs, and community-based organizations serving LMI populations;
- Offering community development services such as employee volunteerism, mentorship, or participation on boards of organizations delivering financial literacy instruction;
- Supporting qualified investments in nonprofit organizations that deliver financial literacy, entrepreneurship, or credit-counseling programs for LMI families; and
- Partnering with local educational and workforce institutions to integrate financial literacy into broader economic-mobility initiatives.

#### **5. Plan and Measurable Goals**

This section defines the Bank’s strategy for demonstrating performance under the CRA through the establishment of measurable goals against which the Bank will be evaluated by the OCC. In developing these goals, the Bank considered its business strategy, financial capacity, product offerings, and competitive environment; economic conditions in the Assessment Area; the results of the community needs assessment; informal stakeholder feedback; and peer performance in community development lending, investments, and services, including benchmarks from CRA evaluations of similarly-situated institutions

The Bank designed this Plan in accordance with 12 C.F.R. 25.27. The measurable goals are aligned with the requirements of 12 C.F.R. 25.27(f)(1) and reflect the Bank’s business model, capacity, and

community context while emphasizing activities most responsive to community credit needs in a safe and sound manner.

The Plan covers a three-year period beginning on May 6, 2026 or the date of OCC approval. Annual interim goals are established for the following performance categories: community development lending, community development investments, grants and donations, and community development services within the Assessment Area.<sup>11, 12</sup> The Bank's fiscal year for measuring Plan performance will be January 1 through December 31. Each goal is expressed in both quantitative and qualitative terms so that performance is evaluated on the volume of activity as well as the responsiveness, innovation, and impact of the Bank's efforts.

The Bank's performance will be assessed using the OCC's established rating framework of Outstanding, Satisfactory, Needs to Improve, or Substantial Noncompliance. The Bank's objective is to achieve an Outstanding rating by substantially meeting or exceeding the measurable goals set forth in the Outstanding category for each performance area.

In executing this Plan, the Bank will engage in community development activities that are responsive to the needs identified in Section 4 and that benefit individuals and communities within the Assessment Area, particularly LMI populations. These activities will align with the community development purposes outlined in the CRA regulations and may include affordable housing for LMI individuals, economic development, community services targeted to LMI populations, and neighborhood revitalization and stabilization.

Specific activities will be selected and refined through ongoing engagement with local community organizations, government agencies, and nonprofit partners, ensuring that the Bank's efforts remain responsive to community development needs and opportunities within the Assessment Area. The Bank will also seek opportunities to support innovative and high-impact approaches that enhance community benefit and complement existing public and private initiatives.

The Bank recognizes that its performance will be evaluated relative to the measurable goals in this Plan and in light of its performance context, including its capacity and operating conditions. If the Bank experiences a material change in its business strategy, operations, or capacity that could significantly affect its ability to meet the established goals, management will consult with the OCC to determine whether an amendment to the Plan in accordance with 12 C.F.R. 25.27(h) is appropriate. The Bank will maintain open communication with its regulators and stakeholders and will continue to support a CRA program that meaningfully addresses the credit and community development needs of the communities it serves.

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<sup>11</sup> In determining geographic scope of community development activities eligible for CRA consideration, the Bank will rely on the Interagency Questions and Answers Regarding Community Reinvestment including Q&A § \_\_.12(h)–6 and Q&A § \_\_.23(a)–1 and –2.

<sup>12</sup> Under Q&A § \_\_.21(f)–1 of the Interagency Questions and Answers Regarding Community Reinvestment, the Agencies apply a broader geographic criterion when evaluating activities undertaken in cooperation with minority- and women-owned financial institutions and low-income credit unions (collectively, MWLIs). Such loans, investments, or services will be favorably considered in the Bank's CRA evaluation even if the MWLI is not located in, and the activities do not benefit, the Bank's assessment area or the broader statewide or regional area, provided the activity helps meet the credit needs of the MWLI's local community. Examples include capital investments, deposits, or loan participations involving MWLIs.

## **5.1. Peer Performance**

In developing the measurable goals in this Plan, the Bank employed a quantitative analysis versus peer institutions to provide an objective benchmark for evaluating whether its targets are appropriately calibrated and achievable. Peer institutions were selected based on characteristics comparable to the Bank's business model, including limited or no branch networks, nationwide lending platforms, digital delivery channels, and similar asset size. Because the Bank's operating model is distinctive, no single institution provides an exact comparison; however, the selected peers share key operational features and regulatory considerations that offer a meaningful basis for evaluating performance within the context of this Plan.

Identified peer institutions include Varo Bank, N.A., Green Dot Bank, Nelnet Bank, WebBank, Medallion Bank, Bancorp Bank, N.A., and Pathward, N.A. These institutions were selected because they operate nationwide, deliver products primarily through digital channels, and maintain business models that are not well captured by traditional retail lending metrics within their assessment areas. The Bank reviewed available CRA strategic plans, regulatory evaluations, and publicly disclosed performance data for these peers, as referenced in Appendix D, to inform its understanding of performance context and to help calibrate the measurable goals in this Plan.

The peer data was analyzed to assess the level and mix of CRA-qualified activities including community development loans, qualified investments, grants and donations, and community development services relative to asset size, capacity, and broader performance context. The Bank used this analysis to help calibrate its measurable CRA goals so that its proposed performance standards are appropriately ambitious and achievable. This review also supported alignment with practices observed in other institutions with similar operational models and supervisory expectations. Although peer data informed the development of this Plan, the Bank's final goals are tailored to its unique assessment area, community needs, and capacity to deliver safe, sound, and impactful community development outcomes.

## **5.2. Established Goals**

### **5.2.1. Community Development Loans and Investments (Goal #1 and #2)**

The Bank has established combined Community Development Loan and Investment goals to allow flexibility in deploying capital where it can produce the greatest community development impact while maintaining clear and measurable commitments across both lending and investment activity (see Section 2.4.1). Consistent with the practices of peers, the Bank expects qualified investments to serve as the primary means of meeting these goals with community development loans.

Goal #1 is based on annual Community Development Loans and Investments as a percentage of average assets. Peer strategic plans set Satisfactory performance goals between 0.40% and 0.50% (average of 0.43%). Outstanding performance goals were consistently set at 0.60% across peer institutions.

Based on this benchmarking, the Bank has defined Goal #1 levels of 0.40% for a Satisfactory rating and 0.60% for an Outstanding rating in 2028 (Table 7). Based on the Bank's de novo status, these goals are structured as an incremental three-year progression. Annual increases are designed to reflect the Bank's expected growth trajectory and reach peer benchmark levels by the third year of the Plan.

Goal #2 is based on cumulative amounts of Community Development Loans and Investments as a percentage of average assets, and it serves as a multi-year metric of community development activity. Peer strategic plans set Satisfactory performance goals ranging from 1.15% to 1.40% (average of 1.27%). Outstanding performance goals ranged from 1.45% to 1.80% (average of 1.63%).

Based on this benchmarking and recognizing that the Bank will have no pre-existing Community Development Loans and Investments, the Bank has defined Goal #2 levels of 0.90% for a Satisfactory rating and 1.20% for an Outstanding rating in 2028 (Table 7). These cumulative goals increase in each Plan year and reflect the goals for annual volume of new community development activity added each year. They represent a realistic and attainable trajectory for a de novo institution that is building its portfolio from inception, in contrast to peer institutions that enter their plan periods with existing community development portfolios aggregated over multiple years.

Consistent with Section 25.12(h)-6 of the Interagency Questions and Answers Regarding Community Reinvestment, statewide and multistate community development activities may be considered CRA-qualified when their mandate includes serving geographies or individuals within the Assessment Area, even when benefits extend more broadly. To support achievement of its community development lending and investment goals, the Bank may also participate in such regional and statewide initiatives when they help address significant community development needs. The Bank's Broader Statewide or Regional Area (BSRA), for purposes of this Plan, is the State of Ohio.

<b>Table 7: Community Development Loans and Investments Goals</b>				
<b>Fiscal Year 1/1 to 12/31</b>	<b>Goal #1 New Loans and Investments/ Average Assets</b>		<b>Goal #2 Cumulative Loans and Investments/ Average Assets</b>	
	<b>Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>	<b>Outstanding</b>
2026	0.30%	0.40%	0.30%	0.40%
2027	0.35%	0.50%	0.60%	0.80%
2028	0.40%	0.60%	0.90%	1.20%

Calculations:

New Loans and Investments - Represents the total committed balance at origination for all qualified loans or investments in the current fiscal plan year. A renewal of a loan or investment is considered a new activity.

Cumulative Loans and Investments - Represents New Loans and Investments in each fiscal Plan year, plus the outstanding balance of any qualified investments previously originated during any period, plus the current balance of loans originated during prior years covered within this Plan term.

Average Assets - Calculated by taking the average of line 9 (Total Assets) of Schedule RC-K (Quarterly Averages) of the Report of Condition and Income for the Bank's four quarters in the current fiscal year. For example, a 2028 goal will be calculated using RC-K averages for 3/31/2027, 6/30/2027, 9/30/2027, and 12/31/2027. For the initial year of the plan, management will derive the goal based on Year 1 projected assets.

Community development loans and qualified investments may include activities that support affordable housing for LMI individuals, provide community services targeted to LMI individuals, finance economic development by supporting small businesses or farms that meet applicable size standards, or help revitalize or stabilize LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income areas. Qualified investments may include, but are not limited to, investments, grants, deposits, or shares in financial intermediaries such as Community Development Financial Institutions, Community Development Corporations (“CDCs”), minority- and women-owned financial institutions, community loan funds, and low-income or community development credit unions.

Other examples of qualified investments include investments in organizations engaged in affordable housing development or rehabilitation; Community Development Venture Capital companies; Small Business Investment Companies (“SBICs”) or Rural Business Investment Companies (“RBICs”); facilities that provide essential community services such as homeless shelters, youth centers, health

clinics, and substance recovery programs; projects eligible for Low-Income Housing Tax Credits; state or municipal obligations that support community development purposes; and nonprofit organizations providing credit counseling, homeownership education, or financial literacy training.

A number of organizations within the Bank’s Assessment Area and the broader region represent the types of community development partners the Bank may consider for Community Development Loans and Investments. The Affordable Housing Trust for Columbus and Franklin County, a certified CDFI, provides financing for the development and preservation of affordable housing throughout Central Ohio and represents a strong example of an entity through which the Bank could support affordable housing initiatives. Similarly, the Ohio Capital Finance Corporation, a statewide CDFI, offers pre-development, acquisition, construction, and permanent financing for affordable housing and neighborhood revitalization projects, providing opportunities to advance both housing and stabilization objectives within the Bank’s Assessment Area.

In addition to housing-focused entities, the region includes several organizations that support economic development and small business growth. The Economic & Community Development Institute (ECDI), a Columbus-based certified CDC, provides microloans, business training, and technical assistance to entrepreneurs including LMI and minority-owned small businesses. Freedom Equity Inc., a Central Ohio CDFI, expands access to affordable capital and capacity-building support for underserved entrepreneurs, particularly within the Black business community.

The Bank may also consider partners that expand access to affordable credit for LMI individuals. The St. Vincent de Paul Microloan Program, administered locally through the St. Vincent de Paul Society of Columbus, provides low-interest loans to LMI individuals who may not qualify for traditional credit, helping households address essential expenses. In addition, Advancing Communities Together provides a mechanism for placing deposits with CDFIs and minority depository institutions that serve low-income and minority communities, and under CRA regulatory guidance, deposits in CDFI banks may receive consideration when their activities benefit the Bank’s Assessment Area, while deposits in MDI banks may receive consideration regardless of geographic location.

### 5.2.2. Community Development Grants and Donations (Goal #3)

The Bank has established a Grants and Donations goal (Goal #3) with a primary purpose of supporting community development within its Assessment Area. Consistent with approaches used by peer institutions, these goals are expressed as annual dollar amounts.

Among the Bank’s closest peers by asset size (Nelnet Bank and WebBank), annual Satisfactory goals ranged from \$40,000 to \$80,000 (average of \$62,222), while Outstanding goals ranged from \$60,000 to \$100,000 (average of \$77,778). One peer institution also adopted a multi-year ramp-up approach. A broader comparison using all peers, including those with larger asset bases, resulted in average goals of \$106,111 for Satisfactory and \$117,500 for Outstanding.

Based on this benchmarking, the Bank has defined Goal #3 levels of \$70,000 for a Satisfactory rating and \$85,000 for an Outstanding rating in 2028 (Table 8). The goal amounts increase incrementally in each Plan year.

<b>Table 8: Annual Grants and Donations (Goal #3)</b>		
<b>Fiscal Year 1/1 to 12/31</b>	<b>Satisfactory</b>	<b>Outstanding</b>
2026	\$60,000	\$75,000
2027	\$65,000	\$80,000

2028	\$70,000	\$85,000
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These annual goals are structured to ensure that the Bank can meaningfully contribute to community development while remaining consistent with its financial capacity and safe and sound operations. Grants and donations will be directed to organizations providing community development services for LMI individuals or addressing priority needs identified in the Bank’s Community Needs Assessment such as affordable housing, homelessness prevention, food security, education, workforce development, and financial literacy.

A number of nonprofit organizations within the Assessment Area have been identified as potential recipients of qualifying grants or donations that align directly with the community development needs discussed in Section 4 of this Plan.

To address food insecurity, the Bank may support organizations such as the Mid-Ohio Food Collective and Canal Winchester Human Services, which expand access to nutritious food for LMI households and operate essential community-based food programs. To respond to the rising prevalence of homelessness and housing instability, the Bank may consider partners such as the Community Shelter Board, the Columbus Coalition for the Homeless, and the YWCA and YMCA, which provide emergency shelter, transitional housing, family stabilization, and supportive services for LMI individuals and families.

Given that affordable housing remains in short supply, the Bank may support organizations such as Habitat for Humanity–MidOhio, Creative Housing, the United Way of Central Ohio, and Columbus Scholar House, all of which contribute to affordable or supportive housing efforts for LMI or otherwise vulnerable households. To address limited access to affordable childcare and early education, the Bank may consider supporting Action for Children, the region’s child care resource and referral agency that strengthens early childhood education by training and supporting providers serving LMI families.

To respond to gaps in education, career development, and financial literacy, the Bank may consider supporting organizations such as Junior Achievement of Central Ohio, Apprisen, the Columbus Literacy Council, and community-serving programs at Ohio State University that offer literacy, nutrition, youth development, and job-readiness services for underserved residents. The Bank may also consider the Columbus Urban League, which offers workforce training, financial counseling, and career pathway services for LMI youth and adults.

These organizations represent the types of community development partners that align with the needs identified in the Assessment Area and with CRA-eligible activities the Bank may support to help meet its measurable goals under this Plan. The organizations listed are examples only and do not constitute a commitment to fund them, nor do they limit the Bank’s consideration of other qualified recipients. Management will continue to evaluate grant and donation opportunities throughout the term of the Plan to ensure that activities remain aligned with the Bank’s community development objectives, responsive to evolving local needs, and conducted in a safe and sound manner.

**5.2.3. Community Development Service (Goal #4)**

The Bank has established a Community Development Service goal (Goal #4) to support qualified service activities that address community development needs within the Assessment Area. The Bank’s community development service goal is expressed in terms of community development service hours per employee per year.

Peer strategic plans set Satisfactory performance goals that ranged from 0.1 hours to 6.5 hours per employee per year (average of 3.0 hours). Outstanding goals ranged from 0.2 hours and 8.0 hours per employee per year (average of 3.9 hours) for peer institutions. Based on this benchmarking, the Bank has

defined Goal #4 levels of 2 hours per employee per year for a Satisfactory rating and 3 hours per employee per year for an Outstanding rating (Table 9).

<b>Table 9: Annual Total Service Hours Per Full-Time Employee (Goal #4)</b>		
<b>Fiscal Year 1/1 to 12/31</b>	<b>Satisfactory</b>	<b>Outstanding</b>
2026	2 hours	3 hours
2027	2 hours	3 hours
2028	2 hours	3 hours

Based on the Bank’s projected full-time headcount, the annual goals correspond to approximately 90, 130, and 180 total community development service hours in 2026, 2027, and 2028 respectively for a Satisfactory rating. For an Outstanding rating, these goals correspond to approximately 135, 195, and 270 total hours in 2026, 2027, and 2028.

Qualified community development service activities will include services that primarily benefit LMI individuals or geographies and that leverage the financial or professional expertise of Bank employees, consistent with CRA regulatory definitions. These activities will align with the Bank’s mission and areas of expertise and support the community development needs identified in Section 4 of this Plan.

Examples include serving on the boards or committees of community development or social-service organizations; providing financial education or counseling on topics such as budgeting, credit management, or homeownership; and delivering entrepreneurship training or small business development assistance to LMI or underserved entrepreneurs. Additional activities may include providing technical or advisory support to nonprofit housing or homelessness organizations, supporting workforce development programs through job-readiness coaching for LMI individuals, offering skills-based assistance to childcare or early education providers serving LMI families, or participation in the Internal Revenue Service’s Volunteer Income Tax Assistance program.

The Bank will encourage employee participation in these activities and will identify opportunities in collaboration with local nonprofit and government partners to ensure service efforts remain aligned with emerging community needs and the Bank’s capacity. Performance under this goal will be assessed based on the total number of qualified service hours, the nature and impact of the activities, and their alignment with the community development needs identified in Section 4 of this Plan.

**6. Plan Administration**

**6.1. Oversight and Review**

The Board will oversee implementation of this Plan and ensure that adequate resources are dedicated to meeting its measurable goals. The Board and the MRCC will monitor performance at least quarterly to assess progress toward the goals and to confirm continued alignment with the Bank’s strategy, capacity, and performance context. The Bank will maintain documentation of all CRA performance reviews, associated findings, and any corrective actions taken.

If a material change occurs in the Bank’s mission, business strategy, or operating environment that could significantly affect its ability to meet the goals set forth in this Plan, the Bank will consult with the OCC to determine whether an amendment to the Plan is appropriate in accordance with applicable CRA requirements.

## **6.2. Roles and Responsibilities**

The Board has ultimate responsibility for the Bank's CRA compliance program. The Chief Risk Officer provides executive oversight of CRA compliance, and the Compliance Officer is responsible for implementing and managing the CRA program including employee training. The Compliance Officer reports at least quarterly to the MRCC and BRCC on CRA performance including progress toward goals, community impact measures, examination readiness, and any corrective actions taken.

The Compliance Officer maintains all required CRA documentation including the CRA Public File and ensures that all notices are current, accessible, and compliant with regulatory disclosure requirements. The Compliance Officer also maintains records of CRA analyses, community contacts, public comments, examiner correspondence, and self-assessments, and coordinates or conducts periodic assessments of CRA performance, including the implementation of corrective actions when needed. The Compliance Officer serves as the Bank's primary liaison with regulatory agencies during CRA examinations and coordinates timely and accurate responses to examiner requests. To support continuity of compliance, the Compliance Officer maintains appropriate delegation, backup staffing, and succession planning.

To support community engagement and opportunity identification, the Compliance Officer cultivates relationships with community development organizations, local government officials, and other stakeholders within the Assessment Area. These efforts inform the Bank's assessment of community needs and help identify opportunities for CRA-qualified loans, investments, and services. The Compliance Officer also monitors emerging needs in low- and moderate-income communities and recommends program adjustments to management and the Board when appropriate.

Responsibilities for CRA-qualified lending and investment activities are shared across the Compliance Officer, the Chief Credit Officer, and the Chief Financial Officer. The Compliance Officer is responsible for overseeing the identification and documentation of CRA-qualified activities and for coordinating with business units to ensure that CRA reporting is accurate and complete. The Compliance Officer oversees the review of CRA-related lending and investment activities to confirm their alignment with the Bank's fair lending and consumer protection obligations. The Chief Credit Officer is responsible for identifying, evaluating, and documenting community development loans and loan participations and for ensuring that these activities are appropriately underwritten and supported for CRA qualification. The Chief Financial Officer is responsible for identifying, evaluating, approving, and documenting community development investments and for ensuring that investment records are accurate and properly reflected in CRA reporting.

## **6.3. Request for OCC Approval**

In accordance with 12 C.F.R. 25.27(g), the Bank respectfully requests the approval of this CRA Strategic Plan by the OCC. The Bank affirms that this Plan satisfies the regulatory requirements governing the development and submission of a CRA strategic plan, including providing a reasonable opportunity for public participation through the solicitation and consideration of written comments, demonstrating responsiveness to community credit, investment, and service needs within the Assessment Area, and establishing measurable performance goals that are consistent with the Bank's business strategy, capacity, and performance context.

The Board will review and approve this Plan and will certify that it accurately reflects the Bank's commitment to help meet the credit needs of its communities, including those of low- and moderate-income areas, in a manner consistent with safe and sound operations. The Bank will maintain documentation supporting the development of this Plan, the public-comment process, the implementation

of the Plan, and will consult with the OCC regarding any material modifications that may require amendment and reapproval.

#### **6.4. Election of an Alternative CRA Performance Standard**

The Board of Directors and management intend for the Bank to meet or exceed all goals and performance standards established in this Plan. However, in accordance with 12 C.F.R. 25.27(h), the Bank may request that the Plan be amended on the grounds that there has been a material change in its circumstances during the Plan period. Any such request will be made in consultation with the OCC and supported by documentation demonstrating that an alternative evaluation method more accurately reflects the Bank's circumstances and community reinvestment opportunities.

The Bank acknowledges that any such request is subject to OCC review and approval and that the OCC may require public comment on a material modification. The Bank will continue to operate in a manner consistent with the objectives of the CRA during any transition to an alternative evaluation method.

#### **6.5. Bank Contact Information**

For information regarding this Plan, please contact:

Erebor Bank, N.A.

Mailing Address: 500 Neil Avenue, Suite 140, Columbus, OH 43215

Email Address: [cra@erebor.so](mailto:cra@erebor.so)

Phone Number: [(614) 259-7339]

Email Address for CRA plan comments or questions: [cra@erebor.so](mailto:cra@erebor.so)

## **7. Appendix A – Community Needs Assessment References**

- Action for Children, Dedication Through Difficulty: Central Ohio Child Care Provider Survey Report, December 2024.
- Alcohol, Drug, and Mental Health Board of Franklin County, 2024 Community Needs Assessment.
- Altarum, Ohio Survey Respondents Struggle to Afford High Health Care Costs: Consumer Healthcare Experience State Survey, December 2024.
- City of Columbus, HUD Consolidated Plan 2020–2024 and 2024 Annual Action Plan.
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- Community Shelter Board (prepared by Focus Strategies), Columbus and Franklin County Comprehensive Community Assessment: Final Report, 2024.
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- Ethan W. Combs, Maya Sivakumaran, Kevin P. Cullen, Michael Pires, and Lisa A. Frazier, 2023 Central Ohio Veteran and Family Needs Assessment Final Report, The Ohio State University and Battelle Center for Science, Engineering, and Public Policy, March 2024.
- Federal Deposit Insurance Corporation, FDIC 2023 National Survey of Unbanked and Underbanked Households, 2023.
- Feeding America, 2023 Food Insecurity in Franklin County, Ohio: Map the Meal Gap, 2024.
- Groundwork Ohio, Voter Poll: Child Care and Early Education, September 2025.
- Judy T. Lin, Christopher Bumcrot, Olivia Valdes, Gary Mottola, Robert Ganem, Susan Sarver, Christine Kieffer, Ritta McLaughlin, Gerri Walsh, and Annamaria Lusardi, Financial Capability in the United States: Results from the FINRA Foundation’s National Financial Capability Study, FINRA Investor Education Foundation, July 2025.
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- National Low Income Housing Coalition, The Gap: A Shortage of Affordable Homes, March 2025.
- Ohio Association of Foodbanks, Hunger in Ohio in 2024: A Data-Driven Profile on Ohioans Facing Hunger, 2024.
- Ohio Department of Education and Workforce, Columbus City Schools District – Ohio School Report Cards: 2024-2025, 2025.
- Ohio Department of Education and Workforce, Statewide Career-Technical Education Equity Report, 2023.
- Ohio Housing Finance Agency, Fiscal Year 2026 Ohio Housing Needs Assessment, 2025.
- U.S. Department of Housing and Urban Development, The 2024 Annual Homelessness Assessment Report to Congress, December 2024.

8. Appendix B – Assessment Area Map – Columbus Metropolitan Statistical Area



## 9. Appendix C – Census Tracts

Each census tract in the Bank’s delineated Assessment Area within the Columbus MSA is identified below.

Franklin									Delaware
0001.10	0027.10	0060.00	0069.10	0073.02	0079.60	0087.20	0093.91	0104.02	0101.00
0001.20	0027.30	0061.00	0069.21	0073.03	0079.61	0087.30	0093.92	0105.01	0102.00
0002.10	0027.40	0062.36	0069.23	0073.05	0079.62	0088.11	0093.93	0105.02	0104.20
0002.20	0027.50	0062.37	0069.24	0073.06	0079.63	0088.12	0093.94	0106.01	0104.21
0003.10	0027.60	0062.38	0069.31	0073.94	0079.64	0088.13	0093.95	0106.02	0104.22
0003.20	0027.70	0062.39	0069.32	0073.97	0079.65	0088.21	0093.96	0107.00	0105.20
0003.30	0027.80	0062.40	0069.33	0073.98	0079.66	0088.22	0093.97	0109.00	0105.30
0004.10	0028.00	0062.41	0069.43	0074.24	0080.01	0088.25	0094.01	9800.00	0111.01
0004.20	0029.00	0063.01	0069.44	0074.25	0080.02	0089.00	0094.03		0111.02
0005.00	0030.00	0063.02	0069.45	0074.26	0081.10	0090.00	0094.04		0112.00
0006.00	0032.00	0063.10	0069.50	0074.27	0081.20	0091.00	0094.05		0114.11
0007.10	0036.00	0063.21	0069.91	0074.92	0081.32	0092.20	0094.10		0114.12
0007.20	0037.00	0063.23	0069.92	0074.94	0081.63	0092.30	0094.20		0114.21
0007.30	0038.00	0063.30	0070.10	0075.11	0081.64	0092.40	0094.40		0114.23
0008.10	0040.01	0063.40	0070.20	0075.12	0081.65	0092.50	0094.95		0114.30
0008.20	0040.02	0063.51	0070.41	0075.20	0081.66	0092.51	0094.97		0114.31
0009.10	0042.00	0063.52	0070.43	0075.31	0081.67	0092.52	0094.98		0114.32
0009.20	0043.01	0063.53	0070.44	0075.32	0081.68	0093.11	0095.20		0115.20
0010.00	0043.02	0063.72	0070.47	0075.33	0081.69	0093.12	0095.90		0115.30
0011.10	0045.00	0063.84	0070.48	0075.34	0081.70	0093.21	0096.00		0115.40
0011.21	0046.10	0063.86	0071.01	0075.50	0081.71	0093.22	0097.11		0115.61
0011.22	0046.20	0063.87	0071.02	0075.52	0081.72	0093.23	0097.12		0115.62
0012.00	0047.00	0063.91	0071.03	0075.53	0082.10	0093.25	0097.51		0115.63
0013.01	0048.10	0063.92	0071.12	0077.10	0082.30	0093.26	0097.52		0115.64
0013.02	0048.20	0063.93	0071.13	0077.21	0082.41	0093.32	0097.53		0115.65
0014.00	0049.00	0063.94	0071.14	0077.22	0082.42	0093.34	0097.54		0116.04
0015.00	0050.01	0063.95	0071.15	0077.30	0083.11	0093.36	0097.55		0117.10
0016.00	0050.02	0063.96	0071.20	0077.40	0083.12	0093.37	0097.56		0117.40
0017.00	0051.00	0063.97	0071.93	0078.11	0083.21	0093.40	0097.57		0117.60
0018.10	0052.00	0063.98	0071.98	0078.12	0083.22	0093.50	0098.01		0117.62
0018.20	0053.00	0064.10	0071.99	0078.20	0083.30	0093.61	0098.02		0117.63
0019.01	0054.10	0064.30	0072.02	0078.30	0083.40	0093.72	0099.00		0117.64
0019.02	0054.20	0065.00	0072.05	0079.22	0083.50	0093.73	0100.00		0117.65
0020.00	0055.00	0066.00	0072.09	0079.31	0083.60	0093.81	0101.00		0117.66
0021.00	0056.10	0067.10	0072.11	0079.41	0083.80	0093.82	0102.01		0119.00
0022.00	0056.20	0067.21	0072.12	0079.55	0083.81	0093.83	0102.02		0120.00
0023.00	0057.00	0067.22	0072.13	0079.56	0083.82	0093.84	0102.03		0121.00
0025.10	0058.10	0068.10	0072.14	0079.57	0084.00	0093.85	0102.04		0122.00
0025.20	0058.20	0068.21	0072.15	0079.58	0085.00	0093.86	0103.00		0123.00

0026.00	0059.00	0068.22	0073.01	0079.59	0087.10	0093.90	0104.01		0124.00
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Licking	Licking	Fairfield	Union	Pickaway	Madison	Perry	Morrow	Hocking
7507.00	7586.02	0301.00	0501.00	0201.00	0401.01	9658.01	9650.00	9649.00
7510.00	7589.01	0302.00	0502.00	0202.00	0401.02	9658.02	9651.00	9650.00
7513.00	7589.02	0303.00	0503.01	0203.10	0402.01	9659.01	9652.01	9651.00
7516.00	7590.00	0304.00	0503.03	0203.20	0402.02	9659.02	9652.02	9652.00
7519.00	7591.01	0306.01	0503.04	0204.00	0404.00	9660.00	9653.00	9653.00
7522.00	7591.02	0306.02	0504.01	0211.01	0405.00	9661.00	9654.01	9654.00
7525.00		0307.00	0504.02	0211.02	0406.00	9662.00	9654.02	9655.00
7528.01		0308.00	0505.01	0212.01	0407.00	9663.01	9655.01	
7528.02		0309.01	0505.02	0212.02	0410.00	9663.02	9655.02	
7531.00		0309.02	0506.01	0213.00	0411.00			
7533.01		0310.00	0506.02	0214.01	0412.00			
7533.02		0311.00	0507.01	0214.03	0413.00			
7536.00		0312.00	0507.02	0214.04				
7539.00		0313.00		0215.00				
7541.02		0314.01		0216.00				
7541.03		0314.02		0217.00				
7541.04		0315.00						
7544.00		0316.00						
7547.00		0317.00						
7550.00		0320.00						
7553.01		0321.00						
7553.02		0322.00						
7556.01		0323.00						
7556.02		0325.01						
7559.01		0325.02						
7559.02		0326.01						
7562.01		0326.02						
7562.03		0327.01						
7562.04		0327.03						
7565.00		0327.04						
7568.01		0328.00						
7568.02		0329.01						
7568.03		0329.02						
7571.00		0330.00						
7574.01		0331.01						
7574.02		0331.02						
7577.01								
7577.02								
7583.00								
7586.01								

## 10. Appendix D – Peer Data

Goal #1 and Goal #2: Community Development Loans and Investments					
Peer Bank <sup>13</sup>	Year	Goal #1 New Loans and Investments/ Average Assets		Goal #2 Cumulative Loans and Investments/ Average Assets	
		Satisfactory	Outstanding	Satisfactory	Outstanding
Varo Bank, N.A.	2021	Not reported		0.20%	0.30%
Varo Bank, N.A.	2022			0.30%	0.40%
Varo Bank, N.A.	2023			0.40%	0.45%
Varo Bank, N.A.	2024			0.40%	0.50%
Varo Bank, N.A.	2025			0.50%	0.60%
GreenDot Bank	2024	0.40%	0.60%	1.40%	1.80%
GreenDot Bank	2025	0.40%	0.60%	1.40%	1.80%
GreenDot Bank	2026	0.40%	0.60%	1.40%	1.80%
GreenDot Bank	2027	0.40%	0.60%	1.40%	1.80%
GreenDot Bank	2028	0.40%	0.60%	1.40%	1.80%
Nelnet Bank	2024	0.50%	0.60%	1.20%	1.45%
Nelnet Bank	2025	0.50%	0.60%	1.20%	1.45%
Nelnet Bank	2026	0.50%	0.60%	1.20%	1.45%
Nelnet Bank	2027	0.50%	0.60%	1.20%	1.45%
Nelnet Bank	2028	0.50%	0.60%	1.20%	1.45%
WebBank	2023	0.40%	0.60%	1.15%	1.50%
WebBank	2024	0.40%	0.60%	1.15%	1.50%
WebBank	2025	0.40%	0.60%	1.15%	1.50%
WebBank	2026	0.40%	0.60%	1.15%	1.50%
Medallion Bank	2025	0.40%	0.60%	1.30%	1.75%
Medallion Bank	2026	0.40%	0.60%	1.30%	1.75%
Medallion Bank	2027	0.40%	0.60%	1.30%	1.75%
Medallion Bank	2028	0.40%	0.60%	1.30%	1.75%
Medallion Bank	2029	0.40%	0.60%	1.30%	1.75%

<sup>13</sup> Bancorp Bank, N.A. and Pathward, N.A. were excluded from this table because their new lending and investment goals reflect steady-state portfolios and are unusually low relative to peers. In addition, neither bank reported cumulative lending and investment goals.

**Goal # 3 and Goal #4: Grants and Donations and Community Service Hours**

Peer Bank	Year	Goal #3 Grants and Donations		Goal #4 Community Service Hours Per Year/Full-Time Equivalent (FTE)	
		Satisfactory	Outstanding	Satisfactory	Outstanding
Varo Bank, N.A.	2021	Included in community development lending and qualified investments.		0.26 <sup>14</sup>	0.38
Varo Bank, N.A.	2022			0.26	0.38
Varo Bank, N.A.	2023			0.26	0.38
Varo Bank, N.A.	2024			0.26	0.38
Varo Bank, N.A.	2025			0.26	0.38
GreenDot Bank	2024	Included in community development lending and qualified investments.		6.50	8.00
GreenDot Bank	2025			6.50	8.00
GreenDot Bank	2026			6.50	8.00
GreenDot Bank	2027			6.50	8.00
GreenDot Bank	2028			6.50	8.00
Nelnet Bank	2024	\$40,000	\$60,000	3.06 <sup>15</sup>	4.59
Nelnet Bank	2025	\$50,000	\$70,000	3.06	4.59
Nelnet Bank	2026	\$60,000	\$80,000	3.06	4.59
Nelnet Bank	2027	\$70,000	\$90,000	3.06	4.59
Nelnet Bank	2028	\$80,000	\$100,000	3.06	4.59
WebBank	2023	\$65,000	\$75,000	4.00	5.00
WebBank	2024	\$65,000	\$75,000	4.00	5.00
WebBank	2025	\$65,000	\$75,000	4.00	5.00
WebBank	2026	\$65,000	\$75,000	4.00	5.00
Medallion Bank	2025	Included in community development lending and qualified investments.		5.00	6.00
Medallion Bank	2026			5.00	6.00
Medallion Bank	2027			5.00	6.00
Medallion Bank	2028			5.00	6.00
Medallion Bank	2029			5.00	6.00

<sup>14</sup> Varo Bank, N.A., reports per FTE numbers in CRA using only management-level employees. For benchmarking comparability, the figures in this table have been adjusted to reflect total FTEs across all employee levels as of June 30, 2020.

<sup>15</sup> Nelnet Bank reports total employee service hours rather than per-FTE values. For benchmarking comparability, the figures in this table have been adjusted to reflect total FTEs across all offices as of July 29, 2025.

Bancorp Bank, N.A.	2023	\$50,000	\$62,500	0.14 <sup>16</sup>	0.18
Bancorp Bank, N.A.	2024	\$100,000	\$100,000	0.14	0.18
Bancorp Bank, N.A.	2025	\$100,000	\$100,000	0.14	0.18
Pathward, N.A.	2024	\$150,000	\$170,000	0.30 <sup>17</sup>	0.38
Pathward, N.A.	2025	\$170,000	\$190,000	0.30	0.38
Pathward, N.A.	2026	\$190,000	\$210,000	0.30	0.38

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<sup>16</sup> Bancorp Bank, N.A. reports per-FTE figures based on employees located in the Assessment Area. For benchmarking comparability, the figures in this table have been adjusted to reflect total FTEs across all offices as of December 31, 2024.

<sup>17</sup> Pathward, N.A. reports per-FTE figures based on employees located in the Assessment Area. For benchmarking comparability, the figures in this table have been adjusted to reflect total FTEs across all offices as of June 30, 2025.