

PUBLIC DISCLOSURE

January 12, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Oregon Pacific Bank
RSSD # 160360**

**1355 Highway 101
Florence, Oregon, 97439**

**Federal Reserve Bank of San Francisco
101 Market Street
San Francisco, California 94105**

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 the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

Institution’s Community Reinvestment Act (CRA) Rating

Oregon Pacific Bank is rated “SATISFACTORY”

The following table shows the performance ratings for the lending and community development tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS	
	LENDING TEST	COMMUNITY DEVELOPMENT TEST
OUTSTANDING		
SATISFACTORY	X	X
NEEDS TO IMPROVE		
SUBSTANTIAL NONCOMPLIANCE		

The major factors supporting the institution’s rating include:

- A reasonable loan-to-deposit (LTD) ratio given the bank’s size, financial condition, and assessment area credit needs.
- A substantial majority of loans originated within the bank’s assessment areas (AA).
- An excellent geographic distribution of small business loans.
- A poor distribution of loans among businesses of different sizes.
- Adequate responsiveness to the community development needs of the bank’s assessment areas through a substantial level of community development loans, investments, services and donations benefiting organizations that serve low-and-moderate-income individuals.

INSTITUTION

Description of Institution

Oregon Pacific Banking Company dba Oregon Pacific Bank (OPB/bank) is a wholly owned subsidiary of Oregon Pacific Bancorp (OPBC). Headquartered in Florence, Oregon, OPB reported total assets of \$837.4 million as of September 30, 2025, and operates six full-service offices within the state of Oregon. The offices are located in Florence, Eugene, Coos Bay, Roseburg, Medford and Portland. OPB also maintains trust and wealth management offices in Florence and Medford. In January 2020, the bank expanded the Medford Trust Office into a full-service branch. The Portland branch located in Tigard, Oregon was opened in 2023.

OPB is primarily a commercial lender, offering a wide range of commercial loan products including Small Business Administration (SBA) loans. The bank also offers consumer loan products. Through most of the evaluation period, the bank offered residential mortgage loans; however, the bank discontinued this lending in June 2025. The bank’s deposit products include checking, money market, and savings accounts, certificates of deposit, and non-reloadable gift cards. Wealth management and brokerage services are offered to customers in California, Oregon, and Washington.

As depicted in Exhibit 1 below, commercial loans represent the majority of the bank’s loan portfolio as of December 31, 2024. While OPB originated loans secured by 1-4 family residential real estate, these loans reflect a smaller portion of the portfolio as OPB acted as a broker for many mortgage originations.

EXHIBIT 1		
LOANS AND LEASES AS OF DECEMBER 31, 2024		
Loan Type	\$(‘000s)	%
Commercial/Industrial & Non-Farm Non-Residential Real Estate	395,935	69.1
Construction & Land Development	32,918	5.7
Secured by 1-4 Family Residential Real Estate	62,481	10.9
Multi-Family Residential Real Estate	75,357	13.2
Farmland & Agriculture	3,311	0.6
Consumer Loans & Credit Cards	676	0.1
State, Political Subdivisions and All Other	2,332	0.4
Total (Gross)	573,010	100.0

The bank’s assessment areas consist of the following:

- Eugene Assessment Area, which consists of eighty-seven census tracts in the eastern portions of Lane County, which is located within the Eugene-Springfield, OR Metropolitan Statistical Area (MSA).
- Florence Assessment Area, which consists of six census tracts in Lane County (within the Eugene-Springfield, OR MSA) and two census tracts in Douglas County.
- Coos Bay Assessment Area, which consists of Coos County in its entirety and is composed of 22 census tracts.
- Roseburg Assessment Area, which consists of 28 census tracts in Douglas County.

- Medford Assessment Area, which consists of the Medford OR, MSA and the Grants Pass-OR MSA.
- Portland Assessment Area, which consists of three counties: Clackamas County, Multnomah County, Washington County. These counties lie within the Portland-Vancouver-Hillsboro, OR MSA.

OPB did not face any legal or financial impediments during the review period that would have prevented it from helping to meet the credit needs of its assessment areas consistent with its business strategy, size, financial capacity, and local economic conditions. The bank received a satisfactory rating at its previous CRA examination, which was conducted on June 18, 2018, by the Federal Reserve Bank of San Francisco using the *Interagency Small Institution CRA Examination Procedures*.

Scope of Examination

OPB's CRA performance was evaluated in accordance with the *Interagency Intermediate Small Institution CRA Examination Procedures*, which consist of the lending and community development tests. The evaluation period for the lending test was January 1, 2024, through December 31, 2024, and the evaluation period for the community development test was January 1, 2021, to January 12, 2026, as the bank became an intermediate small bank effective January 1, 2021.

The Eugene and Florence assessment areas received a full-scope review based on the bank's larger presence and higher level of lending activity within these markets. The Coos Bay, Roseburg, Portland and Medford assessment areas received a limited-scope review given the bank's limited lending activity and deposit share within those markets. The Eugene assessment area received greater weight in the analysis given its volume of lending activity and the bank's focus on this assessment area.

Responsiveness to consumer complaints was not evaluated as OPB did not receive any CRA-related complaints during the review period.

LENDING TEST

The lending test is based on the following performance criteria:

- Loan volume compared to deposits (LTD Ratio);
- Lending inside versus outside the assessment area (Lending in Assessment Area);
- Dispersion of lending throughout the assessment area (Lending Distribution by Geography); and
- Lending to businesses of different sizes and borrowers of different income levels (Lending Distribution by Business Revenue and Borrower Income).

The lending test evaluation was based on a representative sample of small business loans and residential real estate loans. The sampled small business loans were originated or renewed between January 1, 2024, and December 31, 2024. The sampled home mortgage loans were originated or purchased between January 2, 2023, and December 31, 2024. A total of 76 small business loans and 64 home mortgage loans were considered in the evaluation of Lending in the Assessment Area. The limited number of residential mortgage loans within each assessment area prevented a meaningful analysis of the bank's performance in comparison to area demographics and the performance of other

financial institutions. As a result, residential lending was not a factor in the evaluation of the bank's performance related to geographic and borrower distribution.

COMMUNITY DEVELOPMENT TEST

The community development test included an evaluation of the responsiveness of Oregon Pacific Bank's community development activities to community needs and opportunities, as well as the bank's capacity to participate in such activities. The evaluation was based on qualified community development loans, investments, donations, and services provided by the bank from January 1, 2021, through January 12, 2026.

Eleven community representatives were contacted in connection with the evaluation regarding credit needs and market conditions within the assessment areas. Contacts represented organizations working in areas of economic and community development, supporting entrepreneurial culture and tribal communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Oregon Pacific Bank’s overall performance under the lending test is satisfactory. The lending levels relative to deposits are reasonable, and a substantial majority of loans were extended within the bank’s assessment areas. The overall dispersion of small business loans in low- and moderate-income (LMI) geographies is excellent. The bank’s distribution of small business loans among businesses of different revenue sizes is poor.

LOAN-TO-DEPOSIT RATIO

OPB’s loan-to-deposit (LTD) ratio is reasonable, given the bank’s size, financial condition, and assessment area credit needs. The bank’s overall LTD ratio for the 30-quarter period ending on September 30, 2025, is 77.9 percent. The bank was compared against three similarly situated institutions to assess its average LTD performance, and compared reasonably with their average LTD ratios, as depicted in Exhibit 2 below.

EXHIBIT 2 LTD RATIO COMPARISON AS OF SEPTEMBER 30, 2025		
Bank	Total Assets	Average Net LTD Ratio
Oregon Pacific Bank	\$837.4 million	77.9%
Similarly Situated Institution #1	\$628.3 million	82.2%
Similarly Situated Institution #2	\$726.7 million	77.3%
Similarly Situated Institution #3	\$810.4 million	77.7%

LENDING IN ASSESSMENT AREA

A substantial majority of the bank’s sampled OPB’s small business and home mortgage loans were originated within the bank’s assessment areas as shown in Exhibit 3 below. The distribution of loans demonstrates that the bank’s credit activities are focused within and to meet the credit needs of its assessment areas.

EXHIBIT 3 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS JANUARY 1, 2023 – DECEMBER 31, 2024								
Loan Type	Inside				Outside			
	#	%	\$(‘000s)	%	#	%	\$(‘000s)	%
HMDA Home Purchase	31	83.8	\$13,793	85.7	6	16.2	\$2,297	14.3
HMDA Refinance	13	92.9	\$3,142	97.6	1	7.1	\$78	2.4
HMDA Home Improvement	1	100.0	\$35	100.0	0	0	\$0	0
HMDA Multifamily	12	100.0	\$35,040	100.0	0	0	\$0	0
Total HMDA-Related	57	89.1	\$52,010	95.6	7	10.9	\$2,375	4.4
Small Business	71	93.4	\$20,613	87.9	5	6.6	\$2,850	12.1
Total Business-Related	71	93.4	\$20,613	87.9	5	6.6	\$2,850	12.1
Total Loans	128	91.4	\$72,623	93.3	12	8.6	\$5,225	6.7

GEOGRAPHIC AND BORROWER DISTRIBUTION

The bank's geographic distribution of small business loans is excellent. The percentage of the bank's sampled small business loans that were originated in moderate income census tracts in its full-scope assessment areas significantly exceeds aggregate lending and the percentage of small businesses in these tracts. These assessment areas contain no low-income census tracts.

OPB's borrower distribution of small business loans is poor. A majority of the bank's sampled small business loans were originated to businesses with revenues of over \$1 million in its two full-scope assessment areas. This performance was below aggregate lending performance, and significantly lower than the percentage of assessment area businesses of this size. The bank also underperformed aggregate lending regarding loan size, as less than half of the bank's small business loans in its full-scope assessment areas were in amounts of \$100,000 or less, while a significant majority of aggregate lending was comprised of these lower dollar loans which typically benefit small businesses. The bank implemented a Small Business Lending program in 2024 and increased its marketing campaigns in 2025 in an effort to address this gap, but has not yet seen a tangible increase in performance.

RESPONSE TO COMPLAINTS

Oregon Pacific Bank did not receive any CRA-related complaints during the review period. Accordingly, the bank's performance in responding to complaints was not considered in evaluating its overall CRA performance.

Community Development Test

OPB's performance demonstrates adequate responsiveness to the community development needs of its assessment areas through community development loans, investments, and community development services. The bank's community development lending during the evaluation period totaled \$88.8 million. These loans helped to address its assessment areas' needs related to affordable housing, revitalizing and stabilizing low-and-moderate income census tracts and services to low-and-moderate income individuals. Bank employees conducted outreach through volunteer work with multiple non-profit organizations.

An overview of the bank’s community development activities is listed below in Exhibit 4. Details of these activities are further discussed under each applicable assessment area section.

EXHIBIT 4 COMMUNITY DEVELOPMENT ACTIVITIES								
Assessment Area (s)	Loans		Investments				Services	
	#	\$ ('000s)	Prior Period		Current Period		#	Hours
			#	\$ ('000s)	#	\$ ('000s)		
Eugene	43	\$52,707	0	0	33	\$1,106	42	1,840
Florence	9	\$2,485	0	0	7	\$13	45	2,016.5
Medford	6	\$8,186	0	0	5	\$3	11	266.5
Roseburg	13	\$7,610	0	0	12	\$12	4	67
Coos Bay	8	\$2,601	0	0	11	\$12	20	741
Portland	6	\$1,986	0	0	1	\$3	7	223
Broader Statewide or Regional Area	45	\$13,228	0	0	1	\$1	3	107
Total	130	\$88,803	0	0	70	\$1,150	132	5,261

Fair Lending or Other Illegal Practices Review

Concurrent with this CRA evaluation, a review of OPB’s compliance with applicable consumer protection laws and regulations was conducted. The review found no evidence of violation of the substantive provisions of anti-discrimination, fair lending, or credit practices rules, laws or regulations.

FULL-SCOPE ASSESSMENT AREA CONCLUSIONS

For each assessment area where a full-scope review was performed using the examination procedures.

Eugene Assessment Area

DESCRIPTION OF OPERATIONS IN EUGENE AREA

As of 2022, the Eugene assessment area consists of eighty-seven census tracts in the eastern portions of Lane County and is home to the major metropolitan center of Eugene. The area is bordered by Lincoln, Benton, and Linn Counties to the north, Bend and Klamath Counties to the east, and Douglas County to the south. OPB's operations in this assessment area have grown since the last examination, making the Eugene branch the main area of activity for the bank. The bank's operations center is co-located with its Eugene Branch. As of July 1, 2025, the population estimate of Lane County is 381,584.¹

The majority of OPB's banking activity is conducted within Lane County, which is a competitive marketplace for financial services. As of June 30, 2025, OPB held \$502.8 million in deposits, representing 7.54 percent of market share and ranking the bank seventh out of 14 Federal Deposit Insurance Cooperation-insured financial institutions operating within Lane County.²

Exhibit 5 on the following page presents key demographic and business information used to help develop a performance context for the assessment area. The majority of businesses are in middle-income census tracts.

¹ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025; available from: <https://www.census.gov/quickfacts>.

² Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare?displayResults>.

EXHIBIT 5 ASSESSMENT AREA DEMOGRAPHICS ³ EUGENE ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	18,112	21.2
Moderate	21	24.1	18,549	21.7	2,908	15.7	14,196	16.6
Middle	40	46.0	43,293	50.7	3,932	9.1	18,304	21.4
Upper	23	26.4	22,932	26.9	1,015	4.4	34,737	40.7
Unknown	3	3.4	575	0.7	78	13.6	0	0.0
Total AA	87	100.0	85,349	100.0	7,933	9.3	85,349	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	39,804	15,472	18.2	38.9	22,271	56.0	2,061	5.2
Middle	69,797	44,462	52.3	63.7	22,062	31.6	3,273	4.7
Upper	39,840	24,620	29.0	61.8	13,457	33.8	1,763	4.4
Unknown	3,685	429	0.5	11.6	3,047	82.7	209	5.7
Total AA	153,126	84,983	100.0	55.5	60,837	39.7	7,306	4.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4,291	28.2	3,885	27.7	375	35.9	31	25.6
Middle	7,097	46.7	6,578	46.9	464	44.4	55	45.5
Upper	3,561	23.4	3,336	23.8	194	18.6	31	25.6
Unknown	256	1.7	241	1.7	11	1.1	4	3.3
Total AA	15,205	100.0	14,040	100.0	1,044	100.0	121	100.0
Percentage of Total Businesses:				92.3		6.9		0.8

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

Eugene-Springfield’s economy is underwhelming, and is not anticipated to experience significant growth over the near term, as key employers scale back on jobs and tariff-related challenges provide potential barriers to growth.⁴ Single-family housing prices have remained largely stable over the past year, with housing inventory normalizing and affordability remaining an issue.⁵ The weaknesses in this MSA are below-average per capita income, high poverty rate, low housing affordability, and above-average employment volatility.⁶

³ 2000 U.S. Census and 2007 Dun & Bradstreet Data.
⁴ Moody’s Precip Report, Eugene-Springfield, August 2025
⁵ Ibid
⁶ Ibid

Institutions of higher education and the healthcare industry encompass the assessment area’s largest employers. The University of Oregon remains a key economic driver for the Eugene-Springfield area, and despite recent cutbacks, the school is expected to remain a key stabilizer for local retail activity.⁷ While the healthcare segment cooled in 2025 and has grown more uncertain, PeaceHealth Medical Group and McKenzie-Willamette Medical Center also remain among the area’s primary employers.⁸ Eugene’s farm economy is also facing challenges, as increased costs for certain inputs such as fertilizer and machinery impact profit margins and farms, and operators struggle manage labor costs and sustain payrolls.⁹

Employment Statistics

The unemployment rate in Eugene has improved since the pandemic, though the area experienced a slight increase in the unemployment rate in 2024 as reflected in Exhibit 6 below. The unemployment rate in Eugene is in line with the general state average.

EXHIBIT 6 2024 UNEMPLOYMENT RATES EUGENE ASSESSMENT AREA					
Area	2020	2021	2022	2023	2024
Eugene Assessment Area	7.7%	5.4%	4.2%	3.9%	4.2%
Oregon	7.6%	5.2%	4.0%	3.8%	4.2%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

The area experienced a net decrease in jobs in the first half of 2025, leaving total employment unchanged from a year ago.¹⁰ Payrolls in manufacturing and retail have been trending lower since 2023, and other industries including local government – previously a strong employment driver – have remained relatively flat.¹¹ Consistent with statewide performance, Eugene’s unemployment rate rose over half a percent in 2025 to nearly five percent, which is slightly above pre-pandemic figures.¹²

Population Change

The assessment area experienced steady population growth, increasing 7.3 percent between 2015 and 2020, the most recent period for which this census data is available. As reflected in Exhibit 7 below, this growth rate was generally consistent with the state’s overall state growth rate during the same period.

EXHIBIT 7 2024 POPULATION CHANGE EUGENE ASSESSMENT AREA			
Area	2015 Population	2020 Population	Percent Change
Eugene Assessment Area	357,060	382,971	7.3%
Oregon	3,939,233	4,237,256	7.6%

Source: 2011-2015 U.S. Census Bureau American Community Survey
 2020 U.S. Census Bureau Decennial Census

⁷ Ibid
⁸ Moody’s Precis Report, Eugene – Springfield, August 2025
⁹ Ibid
¹⁰ Ibid
¹¹ Ibid
¹² Ibid

Median Family Income

As reflected in Exhibit 8 below, the assessment area saw median family income rise 14.2 percent in inflation-adjusted dollars from 2015 to 2020, the most recent period for which this data is available. However, Eugene's income growth was behind the statewide average. Additionally, Eugene's median family income remained below Oregon's overall median income as of 2020.

Approximately 15.3 percent of the area population were in poverty during this period, with 19.1 percent of households receiving Supplemental Nutritional Assistance Program (SNAP) benefits.¹³ An estimated 34.4 percent of households receiving SNAP benefits included two or more workers.¹⁴

EXHIBIT 8 2024 MEDIAN FAMILY INCOME CHANGE EUGENE ASSESSMENT AREA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Eugene Assessment Area	\$63,114	\$72,092	14.2%
Oregon	\$68,793	\$80,630	17.2%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey
 2016 - 2020 U.S. Census Bureau American Community Survey
 Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Small Business Lending

As reflected in Exhibit 9 below, the assessment area experienced declining small business lending from 2021 to 2023, dropping from 7,031 loans in 2021 to 5,940 loans in 2023—a decrease of 15.5 percent. This follows a peak year in 2021, after modest growth from 2019-2021. This trend mirrors the statewide Oregon pattern, which also saw small business loans decline from 2021 to 2023. Lending to small businesses is critical in supporting the local economy given that over 90 percent of all businesses in the assessment area have revenues of \$1 million or less.

EXHIBIT 9 2024 SMALL BUSINESS LOAN TRENDS EUGENE ASSESSMENT AREA					
Area	2019	2020	2021	2022	2023
Eugene Assessment Area	6,386	6,655	7,031	6,687	5,940
Oregon	89,340	91,902	102,393	96,275	86,404

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage Loan Trends

The assessment area experienced a significant decline in home mortgage activity from 2020 to 2024, as reflected in Exhibit 10 on the following page. After a 58.1 percent decline in volume from 2021 to 2022 and an additional 45.5 percent decline the following year, the area experienced a slight rebound in 2024. This trend mirrors the statewide pattern in Oregon, reflecting broader market conditions influenced by rising interest rates during this period.

¹³ 2020-2024 U.S. Census Bureau American Community Survey.

¹⁴ Ibid

EXHIBIT 10 HOME MORTGAGE TRENDS - 2018 AND LATER EUGENE ASSESSMENT AREA					
Area	2020	2021	2022	2023	2024
Eugene Assessment Area	18,758	18,603	7,781	4,238	4,796
Oregon	228,252	223,130	93,318	51,378	58,393

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Housing Cost Burden

Exhibit 11 below details the percentages of cost burdened renters and owners within the assessment area and statewide. The cost burden for renters reflects the need for affordable housing in the area. Low-income renters are the most impacted income group with the highest percentage of cost burden in the assessment area, followed by low-income homeowners. Homeowners face less severe but still substantial burdens, with 70.2 percent of low-income owners and 49 percent of moderate-income owners cost burdened. These assessment area figures are generally comparable to statewide averages.

EXHIBIT 11 2024 HOUSING COST BURDEN EUGENE ASSESSMENT AREA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Eugene Assessment Area	80.1%	54.5%	48.0%	70.2%	49.0%	24.7%
Oregon	80.0%	56.4%	45.8%	68.7%	44.0%	23.3%

Cost Burden is housing cost that equals 30 percent or more of household income.

Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy.

Credit and Community Development Needs

As noted above, representatives of local community organizations with expertise in economic development, small business support services, affordable housing, and tribal services were contacted as part of this evaluation. One contact cited OPB as one of the institutions that are stepping in to provide faster financing and better referral partnerships. Community representatives indicated that small businesses are increasingly burdened by rising rental costs and the challenge of retaining qualified workers as the cost of living – and income expectations – increases and cited a need for increased access to affordable capital for small businesses. Grants to nonprofits for small business technical assistance and partnering on downtown revitalization efforts were also indicated as key needs.

Community contacts also indicated that increased availability of affordable housing and workforce housing is a critical assessment area need, as rents have increased significantly in recent years. Contacts noted that the area also lacks a sufficient supply of lower-priced single-family homes which enable renters to transition to entry-level homeownership as their incomes increase and families grow. Downpayment assistance for first-time homebuyers, as well as lower-cost capital to community development financial institutions (CDFI) and affordable housing developers for re-lending and construction, are key needs within the assessment area.

Community contacts also noted opportunities for financial institutions to participate in and invest in tribal lending, housing, and economic development; funding K-12 financial literacy programs; and essential amenities and services for low- and moderate-income residents.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN EUGENE ASSESSMENT AREA

Lending Test

Oregon Pacific Bank’s overall lending test performance in the Eugene assessment area is satisfactory. A substantial majority of the bank’s loans were made within the assessment area, and the bank’s lending activities satisfactorily addressed the credit needs of the area.

Lending Distribution by Geography

Small Business Lending

OPB’s geographic distribution of small business loans within the assessment area is excellent. Exhibit 12 below illustrates the bank’s small business lending by census tract income level. Both in number of loans and total dollar volume, the percentage of the bank’s lending within moderate-income census tracts significantly exceeds aggregate lending levels and the percentage of area businesses within these tracts. As reflected below, the assessment area contains no low-income tracts.

EXHIBIT 12 DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY EUGENE ASSESSMENT AREA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	45.7	26.0	5,029	43.3	26.9	28.2
Middle	16	45.7	45.5	5,479	47.2	46.5	46.7
Upper	2	5.7	26.5	700	6.0	24.6	23.4
Unknown	1	2.9	2.0	400	3.4	2.0	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	11,608	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Lending Distribution by Business Revenue

Small Business Lending

Oregon Pacific Bank’s lending by business revenue is poor. As depicted on Exhibit 13 on the following page, the percentage of the bank’s sampled small business loans made to businesses with revenues of \$1 million dollars or less is significantly below aggregate performance and the total number of assessment area businesses in this category.

Less than half of the bank’s sampled loans in this assessment area were in amounts of \$100,000 or less. By comparison, 95.1 percent of aggregate loans were made in these amounts. This is a noteworthy gap, as lower-dollar loans particularly benefit smaller businesses and are in strong demand.

EXHIBIT 13 DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES EUGENE ASSESSMENT AREA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	10	28.6	55.8	1,959	16.9	33.5	92.3
Over \$1 Million	24	68.6		9,249	79.7		6.9
Revenue Unknown	1	2.9		400	3.4		0.8
Total	35	100.0		11,608	100.0		100.0
By Loan Size							
\$100,000 or Less	13	37.1	95.1	1,005	8.7	43.7	
\$100,001 - \$250,000	1	2.9	2.6	112	1.0	14.7	
\$250,001 - \$1 Million	21	60.0	2.3	10,491	90.4	41.7	
Total	35	100.0	100.0	11,608	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	6	60.0		450	23.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	4	40.0		1,509	77.0		
Total	10	100.0		1,959	100.0		

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Community Development Test

OPB’s Community Development activity in Eugene is satisfactory. The bank has demonstrated adequate responsiveness to the needs of the Eugene assessment area through community development loans, investments and services. These activities were particularly responsive to affordable housing, revitalizing and stabilizing low-and-moderate income census tracts and services to low-and-moderate income individuals or census tracts. The bank made over 50 percent of their community development loans in the Eugene assessment area and made a majority of their donations within the assessment area.

The bank provided over \$52.7 million in CD loans in the Eugene assessment area. Over \$19.7 million in loans were originated to revitalize and stabilize LMI census tracts, with another \$14.6 million of loans originated to promote affordable housing. An additional \$12.4 million of loans were directed to providing services to LMI individuals and families, and over \$5.9 million of loans were directed to economic development.

A majority of the bank's investments and donations were in the Eugene assessment area, totaling over \$1.1 million and primarily directed at satisfying the area's affordable housing and community service needs. In addition, OPB's staff recorded 1,840 hours of community service within the review period. Notable community development activities include:

- An \$8.3 million loan to support the creation of a facility in a moderate-income census tract for a non-profit organization serving primarily low-and-moderate-income individuals.
- A \$2.1 million loan for construction of a multifamily residential property offering affordable housing units in a low-income census tract.
- A \$2.1 million loan for purchase of a commercial property to attract business activity and revitalize a moderate-income census tract.
- A \$1 million investment for a low-income senior housing complex in Lane County.
- A \$31,500 donation to a nonprofit food bank that provides services for low-and-moderate-income individuals in Lane County.
- 5 donations totaling \$6,000 to a CDFI that provides affordable consumer and small-dollar loans, credit-building programs, and financial coaching to low-and-moderate-income individuals.
- A member of bank management donated over 150 hours serving as a member of the board and finance committee of an area organization that provides affordable housing and LMI resident services.

Florence Assessment Area

DESCRIPTION OF OPERATIONS IN FLORENCE ASSESSMENT AREA

The Florence assessment area consists of six census tracts in Lane County (which are within the Eugene-Springfield, OR MSA) and two census tracts in Douglas County. The census tracts in Lane County are primarily located in the western part of the county and the census tracts in Douglas are located in the northwestern portion of the county. The assessment area is anchored by the city of Florence, which lies 51 miles west of the major metropolitan center of Eugene. Much of the assessment area lies within the Siuslaw National Forest. As of July 1, 2025, the estimated population of the two counties is 503,535.¹⁵

As of June 30, 2025, OPB held \$589.4 million in deposits, representing 4.44 percent of market share and ranking the bank seventh out of 14 Federal Deposit Insurance Cooperation-insured financial institutions operating within the two counties.¹⁶ As of that date, FDIC-insured institutions operated 72 bank branches within these counties, of which three branches are operated by OPB.

Exhibit 14 below presents key demographic and business information used to help develop a performance context for the assessment area.

EXHIBIT 14 ASSESSMENT AREA DEMOGRAPHICS ¹⁷ FLORENCE ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,628	24.4
Moderate-income	2	25	1,616	24.2	145	9	1,484	22.2
Middle-income	6	75	5,066	75.8	448	8.8	1,428	21.4
Upper-income	0	0	0	0	0	0	2,142	32.1
Tract not reported	0	0	0	0	0	0	0	0
Total AA	8	100.0	6,682	100.0	593	8.9	6,682	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3,386	1,716	21.3	50.7	1,111	32.8	559	16.5
Middle-income	10,201	6,359	78.7	62.3	2,083	20.4	1,759	17.2
Upper-income	0	0	0	0	0	0	0	0
Tract not reported	0	0	0	0	0	0	0	0
Total AA	13,587	8,075	100.0	59.4	3,194	23.5	2,318	17.1

¹⁵ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025; available from: <https://www.census.gov/quickfacts>

¹⁶ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare?displayResults>

¹⁷ 2000 U.S. Census and 2007 Dun & Bradstreet Data

Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	259	24.6	245	24.4	9	25.7	5	33.3
Middle-income	795	75.4	759	75.6	26	74.3	10	66.7
Upper-income	0	0	0	0	0	0	0	0
Tract not reported	0	0	0	0	0	0	0	0
Total AA	1,054	100.0	1,004	100.0	35	100.0	15	100.0
Percentage of Total Businesses			95.3		3.3		1.4	

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

The assessment area includes the Pacific coastal area ranging south along the Pacific Coast from the Lane County city of Florence to the Douglas County city of Reedsport. Healthcare and social assistance is the primary industry in Florence, accounting for approximately 45 percent of local jobs, compared to 19 percent for all of Lane County, followed by retail trade at 16 percent and leisure and hospitality at 14 percent.¹⁸ The city’s top employers include Peace Harbor Medical Center, Three Rivers Casino Resort, and Driftwood Shores Resort.¹⁹ Healthcare and social assistance is also the largest industry in the Reedsport area.²⁰

One of the economic drivers of Lane County is travel. Lane County’s travel spending has been increasing since the pandemic and has the second highest level of direct travel spending of Oregon’s 36 counties.²¹ Most travel spending occurred in the eastern portion of the county, which includes the Eugene-Springfield area, at \$1.1 billion, 79 percent. The remaining \$287.5 million in travel spending occurred in the coastal portion of the county.²² Although employment rebounded in the two years immediately after the pandemic, Lane County employment attributed to travel spending has not fully recovered to pre-pandemic levels and has slowly dropped in recent years.²³

Given the limited number of census tracts located within the bank’s designated Florence assessment area, the information provided in Exhibits 15 through 19 includes the combined data for all of Lane Douglas counties, rather than just for the assessment area’s eight census tracts.

¹⁸ Economic Development Annual Report 2025, pg. 6-7, City of Florence; available from: <https://www.ci.florence.or.us/DocumentCenter/View/2645/Economic-Development-Annual-Report-2025-PDF>
¹⁹ City of Florence; available from <https://www.ci.florence.or.us/242/Florences-Workforce---Ready-to-Work>
²⁰ 2025-04 South Coast economic overview; Douglas County economic indicators | State Library of Oregon Digital Collections; available from <https://digitalcollections.library.oregon.gov/nodes/view/305523>
²¹ Lane County Travel Spending Increased in 2024, September 23, 2025, State of Oregon Employment Department; available from: <https://qualityinfo.org/-/lane-county-travel-spending-increased-in-2024?redirect=%2Fmore-articles-lane>
²² Ibid
²³ Ibid

Employment Statistics

As reflected in Exhibit 15 below, the unemployment rate in Florence, Lane County and Douglas County have improved since the pandemic; however, these rates have increased slightly as of 2024. The unemployment rate of Florence is slightly above Lane County, the Eugene-Springfield MSA and the state of Oregon, but below the Douglas County rate.

EXHIBIT 15 2024 UNEMPLOYMENT RATES FLORENCE ASSESSMENT AREA					
Area	2020	2021	2022	2023	2024
Florence	7.8%	5.5%	4.4%	4.1%	4.5%
Douglas County	7.9%	6.0%	5.1%	4.9%	5.3%
Lane County	7.7%	5.4%	4.2%	3.9%	4.2%
Eugene-Springfield MSA	7.7%	5.4%	4.2%	3.9%	4.2%
Oregon	7.6%	5.2%	4.0%	3.8%	4.2%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Population Change

Exhibit 16 below reflects population change information from 2015 to 2020, the most recent period for which this census data is available. The combined counties of Lane and Douglas experienced moderate population growth of 6.4 percent during this period. This growth rate was slightly below the statewide Oregon average of 7.6 percent. The coastal areas of the counties have experienced an out-migration of young adults searching for education and employment opportunities. There has also been a general job-to-job flow from Lane County to other parts of the state.²⁴ Population growth due to births within the coastal region has declined. The slower rate of growth and the migration pattern has had an impact on the coast’s economy.²⁵

EXHIBIT 16 2024 POPULATION CHANGE FLORENCE ASSESSMENT AREA			
Area	2015 Population	2020 Population	Percent Change
Florence	464,254	494,172	6.4%
Douglas County	107,194	111,201	3.7%
Lane County	357,060	382,971	7.3%
Eugene-Springfield MSA	357,060	382,971	7.3%
Oregon	3,939,233	4,237,256	7.6%

²⁴ Job Flows from Lane – Where Do They Go?, September 16, 2025, State of Oregon Employment Department; available from: <https://qualityinfo.org/-/job-flows-from-lane-where-do-they-go-?redirect=%2Fmore-articles-lane>

²⁵ General Coastal Oregon Population Data; available from: <https://www.oregonconservationstrategy.org/oregon-nearshore-strategy/coastal-communities>

Median Family Income

As reflected in Exhibit 17 below, the combined data for Lane and Douglas counties reflect a 12.2 percent increase in median family income from 2015 to 2020, the most recent period for which this data is available. Lane County growth exceeded that of Douglas County during this period, and both counties lagged behind the state average.

EXHIBIT 17 2024 MEDIAN FAMILY INCOME CHANGE FLORENCE ASSESSMENT AREA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Florence	\$60,880	\$68,332	12.2%
Douglas County	\$54,892	\$59,749	8.8%
Lane County	\$63,114	\$72,092	14.2%
Eugene-Springfield MSA	\$63,114	\$72,092	14.2%
Oregon	\$68,793	\$80,630	17.2%

Source: 2011 - 2015 U.S. Census Bureau American Community Survey
 2016 - 2020 U.S. Census Bureau American Community Survey
 Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Small Business Lending

As reflected in Exhibit 18 below, Lane and Douglas Counties experienced steady growth in small business lending from 2019 to 2021, followed by declining volumes in 2022 and 2023. This trend mirrors the broader pattern seen across Oregon.

EXHIBIT 18 2024 SMALL BUSINESS LOAN TRENDS FLORENCE ASSESSMENT AREA					
Area	2019	2020	2021	2022	2023
Florence	8,026	8,442	8,934	8,572	7,648
Douglas County	1,640	1,787	1,903	1,885	1,708
Lane County	6,386	6,655	7,031	6,687	5,940
Eugene-Springfield MSA	6,386	6,655	7,031	6,687	5,940
Oregon	89,340	91,902	102,393	96,275	86,404

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage Loan Trends

As indicated in Exhibit 19 on the following page, the assessment area experienced a significant decline in home mortgage activity from 2021-2023. However, 2024 showed signs of recovery with mortgage volumes 2023 levels. This trend mirrors the broader Oregon market, which also saw a sharp decline that coincided with rising interest rates, followed by a modest 2024 recovery.

EXHIBIT 19 HOME MORTGAGE TRENDS - 2018 AND LATER FLORENCE ASSESSMENT AREA					
Area	2020	2021	2022	2023	2024
Florence	22,772	22,981	9,928	5,540	6,382
Douglas County	4,014	4,378	2,147	1,302	1,586
Lane County	18,758	18,603	7,781	4,238	4,796
Eugene-Springfield MSA	18,758	18,603	7,781	4,238	4,796
Oregon	228,252	223,130	93,318	51,378	58,393

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Housing Cost Burden

In Florence, housing cost burden is substantial across all income levels, with 46.4 percent of all renters and 24.1 percent of all homeowners spending 30 percent or more of their income on housing. As reflected in Exhibit 20 below, low-income residents face particularly severe burdens, with 79.0 percent of low-income renters and 69.7 percent of low-income homeowners being cost-burdened. Florence's cost burden rates are relatively consistent with statewide Oregon figures.

EXHIBIT 20 2024 HOUSING COST BURDEN FLORENCE ASSESSMENT AREA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Florence	79.0%	52.4%	46.4%	69.7%	43.2%	24.1%
Douglas County	73.1%	42.6%	39.0%	68.2%	29.7%	22.5%
Lane County	80.1%	54.5%	48.0%	70.2%	49.0%	24.7%
Eugene-Springfield MSA	80.1%	54.5%	48.0%	70.2%	49.0%	24.7%
Oregon	80.0%	56.4%	45.8%	68.7%	44.0%	23.3%

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Credit and Community Development Needs

Representatives of local community organizations with expertise in economic development, small business support services, affordable housing, and tribal services were contacted as part of this evaluation. These representatives noted that the Florence assessment area population is growing primarily through retiree and near-retiree in-migration, resulting in a community that skews significantly older than both Lane/Douglas County and statewide averages, with notably fewer mid-career households. The contacts identified three interconnected priority challenges affecting credit and development needs: a critical mismatch between housing supply and workforce needs, workforce shortages exacerbated by housing constraints and demographic factors, and pending business succession issues as many owners approach retirement age. Contacts noted that income levels lag behind county and state averages even as local costs continue rising, creating affordability pressures across the community. While financial institutions maintain a local presence, some contacts reported reduced services from these institutions.

Representatives emphasized that housing costs are high relative to local wages, with limited availability at all price points effectively pricing out working households in essential sectors including healthcare, hospitality, education, trades, and public services. They noted that the limited number of affordable housing units currently under development remain insufficient to meet workforce housing demands. The city of Florence has identified workforce housing as a priority project and has developed both a Florence Housing and Economic Plan and Florence Housing Implementation Plan. Opportunities remain for area lenders to provide affordable access to funding for CDFIs and developers to promote additional housing development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORENCE ASSESSMENT AREA

Lending Test

Oregon Pacific Bank’s overall lending test performance in the Florence assessment area is satisfactory. While the bank’s headquarters and primary lending activity has transitioned to the Eugene assessment area, the bank’s lending activities within its Florence assessment area satisfactorily addressed the credit needs of the area.

Lending Distribution by Geography

Small Business Lending

OPB’s geographic distribution of small business loans within the Florence assessment area is excellent. Exhibit 21 below illustrates the bank’s small business lending by census tract income level. The bank’s lending within moderate-income census tracts significantly exceeds aggregate performance and the percentage of small businesses within these tracts. The assessment area contains no low-income tracts for evaluation.

EXHIBIT 21 DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY FLORENCE ASSESSMENT AREA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$(000)	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	57.1	25.3	244	32.9	30.1	24.6
Middle	3	42.9	74.7	499	67.3	69.9	75.4
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	742	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Lending Distribution by Business Revenue

Small Business Lending

Oregon Pacific Bank’s lending by business revenue is poor. By number of loans, the percentage of the bank’s loans which were originated to businesses with revenues of \$1 million dollars or less is significantly below aggregate performance and the percentage of area businesses in this category. However, when evaluating by total dollar volume of lending, the bank’s performance is only slightly lower than aggregate lending to these businesses.

As depicted in Exhibit 22 below, the bank’s performance was well below aggregate lending levels in originating loans of \$100,000 or less, which most heavily benefit smaller businesses.

EXHIBIT 22 DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES FLORENCE ASSESSMENT AREA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	2	28.6	62.8	350	47.2	50.2	95.3
Over \$1 Million	3	42.9		325	43.8		3.3
Revenue Unknown	2	28.6		67	9.0		1.4
Total	7	100.0		742	100.0		100.0
By Loan Size							
\$100,000 or Less	5	71.4	98.3	272	36.7	79.1	
\$100,001 - \$250,000	1	14.3	1.4	170	22.9	13.4	
\$250,001 - \$1 Million	1	14.3	0.3	300	40.4	7.5	
Total	7	100.0	100.0	742	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1	50.0		50	14.3		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	1	50.0		300	85.7		
Total	2	100.0		350	100.0		

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Community Development Test

OPB’s Community Development activity in Florence is satisfactory. The bank has demonstrated adequate responsiveness to the needs of the Florence assessment area through community development loans, donations and services. These activities were particularly responsive to area needs in revitalizing and stabilizing low-and-moderate-income census tracts and in providing services to low-and-moderate-income individuals and families. The bank’s staff recorded its largest number of community service hours in the Florence assessment area.

The bank provided \$2.5 million in community development loans in the Florence assessment area. The largest volume of these loans were to provide community services to LMI census tracts and individuals with a total of \$975,000, followed by over \$600,000 supporting economic development and over \$600,000 for affordable housing. The bank donated almost \$13,000 to organizations in the assessment area, mainly directed toward community services and affordable housing. OPB's staff recorded 2,016.5 hours of community service in the assessment area. Notable community development activities include:

- A \$975,000 loan to a non-profit organization to assist with the purchase of a new building to provide expanded services – including emergency shelter - to LMI individuals.
- A \$500,000 loan for affordable housing in a moderate-income-census tract.
- Three donations totaling \$8,000 to a charitable foundation that provides health and community services to low-and-moderate income individuals.
- A \$2,500 donation to a nonprofit organization that provides transportation to LMI cancer patients to and from their treatments.
- Almost 400 hours of community service by a bank employee utilizing his expertise for a nonprofit organization that provides essential services to LMI individuals, including emergency assistance, domestic violence support, and housing support.

LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS

For each assessment area where a limited-scope review was performed using the examination procedures.

Oregon Pacific Bank's performance in the assessment areas receiving a limited review is consistent with the performance in the Eugene and Florence assessment areas, as depicted in Exhibit 23 below. Due to the bank's smaller presence, lending volume and deposit share, performance in these assessment areas received less weight than the area receiving a full-scope review. Facts and data reviewed, including performance and demographic information, can be found in Appendix B accompanying this report.

EXHIBIT 23 LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS		
ASSESSMENT AREA	LENDING TEST	COMMUNITY DEVELOPMENT TEST
Coos Bay	Consistent	Consistent
Roseburg	Consistent	Consistent
Portland	Consistent	Consistent
Medford	Consistent	Consistent

APPENDIX A

GLOSSARY OF TERMS

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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, home equity 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 and community development tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 and community development tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated area: A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography

APPENDIX B

LIMITED-SCOPE ASSESSMENT AREA MARKET PROFILES

All demographic and economic information in this appendix originates from one of the following sources:

U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025, and July 1, 2024; available from: <http://www.census.gov/quickfacts/>.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare>

Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data; available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>

FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/data/census/median-income>

Coos Bay Assessment Area

The Coos Bay assessment area consists of Coos County in its entirety and is composed of 22 census tracts. It is a part of the Coos Bay-North Bend MSA. The county lies on the Oregon coast south of Florence and Reedsport. Douglas County borders the county to the North and West, and Curry County borders it to the south. Coos County's population estimate as of July 1, 2025, is 63,992.²⁶

As of June 30, 2025, there were seven FDIC-insured institutions operating 13 offices in Coos County. Oregon Pacific Bank ranked fifth out of the seven institutions, operating one branch in the county with a total of \$81.3 million in deposits, representing 6.26 percent of market share.²⁷ Exhibit 24 through Exhibit 26 on the following pages present key demographic and business information concerning the assessment area.

²⁶ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2024; available from: <https://www.census.gov/quickfacts>

²⁷ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare?displayResults>

EXHIBIT 24								
2024 ASSESSMENT AREA DEMOGRAPHICS								
COOS BAY-NORTH BEND ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,353	19.7
Moderate	4	18.2	3,442	20.3	462	13.4	3,043	17.9
Middle	11	50.0	8,446	49.7	1,115	13.2	3,399	20.0
Upper	6	27.3	5,091	30.0	465	9.1	7,184	42.3
Unknown	1	4.5	0	0.0	0	0.0	0	0.0
Total AA	22	100.0	16,979	100.0	2,042	12.0	16,979	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,093	3,660	19.3	60.1	1,738	28.5	695	11.4
Middle	16,812	9,952	52.4	59.2	5,052	30.0	1,808	10.8
Upper	8,341	5,397	28.4	64.7	2,020	24.2	924	11.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	31,246	19,009	100.0	60.8	8,810	28.2	3,427	11.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	317	15.3	299	15.4	10	9.7	8	25.0
Middle	1,193	57.6	1,119	57.8	58	56.3	16	50.0
Upper	562	27.1	519	26.8	35	34.0	8	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,072	100.0	1,937	100.0	103	100.0	32	100.0
Percentage of Total Businesses:			93.5		5.0		1.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	59	50.0	57	51.8	2	25.0	0	0.0
Middle	34	28.8	30	27.3	4	50.0	0	0.0
Upper	25	21.2	23	20.9	2	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	118	100.0	110	100.0	8	100.0	0	0.0
Percentage of Total Farms:			93.2		6.8		0.0	

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 25							
DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY							
COOS BAY-NORTH BEND ASSESSMENT AREA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	30.8	18.1	1,003	35.6	18.4	15.3
Middle	8	61.5	58.6	1,736	61.7	57.3	57.6
Upper	1	7.7	22.2	75	2.7	24.0	27.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.1	0	0.0	0.2	
Total	13	100.0	100.0	2,814	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 26							
DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES							
COOS BAY-NORTH BEND ASSESSMENT AREA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	3	23.1	55.4	575	20.4	28.4	93.5
Over \$1 Million	10	76.9		2,239	79.6		5.0
Revenue Unknown	0	0.0		0	0.0		1.5
Total	13	100.0		2,814	100.0		100.0
By Loan Size							
\$100,000 or Less	2	15.4	93.7	128	4.5	32.7	
\$100,001 - \$250,000	6	46.2	2.2	1,041	37.0	9.4	
\$250,001 - \$1 Million	5	38.5	4.0	1,645	58.5	57.9	
Total	13	100.0	100.0	2,814	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1	33.3		75	13.0		
\$100,001 - \$250,000	1	33.3		117	20.3		
\$250,001 - \$1 Million	1	33.3		383	66.6		
Total	3	100.0		575	100.0		

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Roseburg Assessment Area

The Roseburg assessment area consists of 28 census tracts in Douglas County. The county seat of the county is Roseburg. Douglas County borders the coast of Oregon and Coos County in the west and is bordered on the north by Lane County. On the south, it borders with Curry, Joesphine and Jackson counties and on the east, it borders with Klamath County. Douglas County's population estimate as of July 1, 2025, is 111,951²⁸ and the city of Roseburg's population estimate as of July 1, 2024, is 23,795.²⁹

As of June 30, 2025, there were seven FDIC-insured institutions operating 18 offices in Douglas County. Oregon Pacific Bank ranked sixth out of the seven institutions, operating one branch in the county with a total of \$86.66 million in deposits, representing 1.31 percent of market share.³⁰ Exhibit 27 through Exhibit 29 on the following pages present key demographic and business information concerning the assessment area.

²⁸ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025; available from: <https://www.census.gov/quickfacts>.

²⁹ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2024; available from: <https://www.census.gov/quickfacts>.
Roseburg city population not available for July 1, 2025.

³⁰ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare?displayResults>

EXHIBIT 27								
2024 ASSESSMENT AREA DEMOGRAPHICS								
ROSEBURG ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,663	19.6
Moderate	5	17.9	5,691	19.7	666	11.7	6,008	20.8
Middle	19	67.9	20,779	72.1	1,778	8.6	6,253	21.7
Upper	3	10.7	2,364	8.2	104	4.4	10,910	37.8
Unknown	1	3.6	0	0.0	0	0.0	0	0.0
Total AA	28	100.0	28,834	100.0	2,548	8.8	28,834	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	10,023	5,577	18.1	55.6	3,654	36.5	792	7.9
Middle	34,176	22,566	73.1	66.0	9,012	26.4	2,598	7.6
Upper	3,354	2,728	8.8	81.3	329	9.8	297	8.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	47,553	30,871	100.0	64.9	12,995	27.3	3,687	7.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	648	16.5	587	15.9	49	27.4	12	23.5
Middle	2,857	72.9	2,709	73.4	115	64.2	33	64.7
Upper	415	10.6	394	10.7	15	8.4	6	11.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,920	100.0	3,690	100.0	179	100.0	51	100.0
Percentage of Total Businesses:			94.1		4.6		1.3	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	70	19.0	64	18.1	6	37.5	0	0.0
Middle	242	65.6	232	65.7	10	62.5	0	0.0
Upper	57	15.4	57	16.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	369	100.0	353	100.0	16	100.0	0	0.0
Percentage of Total Farms:			95.7		4.3		0.0	

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 28							
DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY							
ROSEBURG ASSESSMENT AREA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	16.7	18.4	648	18.0	28.9	16.5
Middle	8	66.7	69.8	2,484	68.9	62.7	72.9
Upper	2	16.7	11.8	475	13.2	8.4	10.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	3,607	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 29							
DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES							
ROSEBURG ASSESSMENT AREA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	4	33.3	61.1	1,629	45.2	34.2	94.1
Over \$1 Million	6	50.0		1,494	41.4		4.6
Revenue Unknown	2	16.7		485	13.4		1.3
Total	12	100.0		3,607	100.0		100.0
By Loan Size							
\$100,000 or Less	4	33.3	96.3	195	5.4	47.8	
\$100,001 - \$250,000	2	16.7	2.2	325	9.0	17.6	
\$250,001 - \$1 Million	6	50.0	1.5	3,087	85.6	34.6	
Total	12	100.0	100.0	3,607	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1	25.0		50	3.1		
\$100,001 - \$250,000	1	25.0		125	7.7		
\$250,001 - \$1 Million	2	50.0		1,454	89.3		
Total	4	100.0		1,629	100.0		

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Medford Assessment Area

The Medford assessment area consists of the Medford-OR MSA and the Grants Pass-OR MSA, which are in Jackson and Josephine counties. Medford is in Jackson County, south of Douglas County and between Josephine and Klamath counties. Grants Pass is in Josephine County, which is south of Douglas County and between Curry and Jackson counties. The state of California is south of both counties.

As of July 1, 2025, Jackson County's population estimate is 221,795 and Josephine County's population estimate is 87,867, totaling 309,662 for both counties.³¹

As of June 30, 2025, there were 12 FDIC-insured institutions operating 47 offices in Jackson County. Oregon Pacific Bank ranked 11th out of the 12 institutions, operating one branch in the county with a total of \$23.37 million in deposits, representing 0.51 percent of market share.³² In Josephine County there were 10 FDIC-insured institutions operating 16 offices;³³ however, Oregon Pacific Bank does not have a branch in Josephine County. The branch in Medford services both MSAs.

Exhibit 30 through Exhibit 32 on the following pages present key demographic and business information concerning the assessment area.

³¹ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025; available from: <https://www.census.gov/quickfacts>

³² Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare?displayResults>

³³ Ibid

EXHIBIT 30 2024 ASSESSMENT AREA DEMOGRAPHICS MEDFORD-GRANTS PASS ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.4	375	0.5	90	24.0	16,444	20.1
Moderate	14	18.9	15,933	19.5	2,185	13.7	15,496	19.0
Middle	41	55.4	46,818	57.3	4,292	9.2	16,959	20.8
Upper	17	23.0	18,013	22.0	1,013	5.6	32,816	40.2
Unknown	1	1.4	576	0.7	101	17.5	0	0.0
Total AA	74	100.0	81,715	100.0	7,681	9.4	81,715	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	903	112	0.1	12.4	683	75.6	108	12.0
Moderate	28,307	14,672	17.7	51.8	11,908	42.1	1,727	6.1
Middle	76,233	46,962	56.7	61.6	24,522	32.2	4,749	6.2
Upper	28,961	20,329	24.5	70.2	6,143	21.2	2,489	8.6
Unknown	1,276	763	0.9	59.8	202	15.8	311	24.4
Total AA	135,680	82,838	100.0	61.1	43,458	32.0	9,384	6.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	730	4.8	658	4.6	65	8.5	7	5.6
Moderate	2,849	18.6	2,627	18.2	197	25.8	25	20.0
Middle	8,080	52.7	7,629	52.8	396	51.9	55	44.0
Upper	3,574	23.3	3,433	23.7	104	13.6	37	29.6
Unknown	110	0.7	108	0.7	1	0.1	1	0.8
Total AA	15,343	100.0	14,455	100.0	763	100.0	125	100.0
Percentage of Total Businesses:				94.2		5.0		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	14	2.1	11	1.7	3	13.6	0	0.0
Moderate	51	7.7	49	7.7	2	9.1	0	0.0
Middle	392	59.3	381	59.6	11	50.0	0	0.0
Upper	188	28.4	184	28.8	4	18.2	0	0.0
Unknown	16	2.4	14	2.2	2	9.1	0	0.0
Total AA	661	100.0	639	100.0	22	100.0	0	0.0
Percentage of Total Farms:				96.7		3.3		0.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 31 DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY MEDFORD-GRANTS PASS ASSESSMENT AREA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.2	0	0.0	4.6	4.8
Moderate	0	0.0	15.5	0	0.0	17.0	18.6
Middle	0	0.0	56.3	0	0.0	57.1	52.7
Upper	0	0.0	23.4	0	0.0	20.7	23.3
Unknown	0	0.0	0.7	0	0.0	0.2	0.7
Tract-Unk	0	0.0	1.0	0	0.0	0.3	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 32 DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES MEDFORD-GRANTS PASS ASSESSMENT AREA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	0	0.0	55.1	0	0.0	30.5	94.2
Over \$1 Million	0	0.0		0	0.0		5.0
Revenue Unknown	0	0.0		0	0.0		0.8
Total	0	0.0		0	0.0		100.0
By Loan Size							
\$100,000 or Less	0	0.0	95.7	0	0.0	48.3	
\$100,001 - \$250,000	0	0.0	2.4	0	0.0	14.1	
\$250,001 - \$1 Million	0	0.0	1.9	0	0.0	37.7	
Total	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	0	0.0		0	0.0		

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Portland Assessment Area

The Portland assessment area consists of three counties: Washington County, Multnomah County and Clackamas County. The three counties are in the northwest part of Oregon and are bordered by Columbia County and the state of Washington on the north, Hood River and Wasco counties on the east, Marion and Yamhill counties to the south, and Tillamook and Clatsop counties to the west. As of July 1, 2025, Multnomah's population estimate is 795,391, Washington County's population estimate is 611,708 and Clackamas County's population estimate is 426,280 totaling 1,833,379 for all three counties.³⁴ As of July 1, 2024, the city of Portland's population estimate is 635,749.³⁵ The 2020 median family income for the Portland-Vancouver-Hillsboro, OR-WA MSA was \$94,727 and the 2025 FFIEC estimated median family income is \$124,100.

As of June 30, 2025, there were 16 FDIC-insured institutions operating 93 offices in Washington County, where Oregon Pacific Bank's branch is located. Oregon Pacific Bank ranked 16th out of the 16 institutions, operating one branch in the county with a total of \$10.75 million in deposits, representing 0.09 percent of market share.³⁶ In Multnomah County there were 21 FDIC-insured institutions operating 114 offices and in Clackamas County there were 20 FDIC-insured institutions operating 79 branches;³⁷ however, Oregon Pacific Bank's branch is not located in those counties. As of June 30, 2025, in the Portland-Vancouver-Hillsboro, OR-WA MSA, where the bank's branch is located, there were 29 FDIC-insured intuitions, operating 382 branches. Oregon Pacific Bank ranked 27th out of 29 institutions, operating one branch in the MSA, with a total of \$10.75 in deposits, representing 0.02 percent of the market share.³⁸

Exhibit 33 through Exhibit 35 on the following pages present key demographic and business information concerning the assessment area.

³⁴ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025; available from: <https://www.census.gov/quickfacts>.

³⁵ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2025; available from: <https://www.census.gov/quickfacts>.
Portland city population not available for July 1, 2025.

³⁶ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2025; available from: <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare?displayResults>

³⁷ Ibid

³⁸ Ibid

EXHIBIT 33								
2024 ASSESSMENT AREA DEMOGRAPHICS								
PORTLAND ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	2.6	11,197	2.6	2,808	25.1	86,837	19.8
Moderate	86	20.6	88,331	20.2	11,375	12.9	76,760	17.5
Middle	180	43.1	194,862	44.5	10,513	5.4	91,168	20.8
Upper	138	33.0	143,718	32.8	3,571	2.5	183,543	41.9
Unknown	3	0.7	200	0.0	0	0.0	0	0.0
Total AA	418	100.0	438,308	100.0	28,267	6.4	438,308	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,875	6,612	1.5	31.7	13,152	63.0	1,111	5.3
Moderate	158,540	74,249	17.2	46.8	76,495	48.2	7,796	4.9
Middle	338,173	196,516	45.5	58.1	124,077	36.7	17,580	5.2
Upper	235,758	154,157	35.7	65.4	70,807	30.0	10,794	4.6
Unknown	1,249	260	0.1	20.8	894	71.6	95	7.6
Total AA	754,595	431,794	100.0	57.2	285,425	37.8	37,376	5.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,787	2.0	1,682	2.0	95	1.7	10	1.6
Moderate	16,707	18.4	15,476	18.3	1,126	20.2	105	16.6
Middle	39,755	43.7	36,965	43.6	2,526	45.2	264	41.8
Upper	32,292	35.5	30,288	35.7	1,752	31.4	252	39.9
Unknown	417	0.5	329	0.4	87	1.6	1	0.2
Total AA	90,958	100.0	84,740	100.0	5,586	100.0	632	100.0
Percentage of Total Businesses:			93.2		6.1		0.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	11	0.6	11	0.6	0	0.0	0	0.0
Moderate	151	8.0	145	8.0	6	8.7	0	0.0
Middle	1,207	64.3	1,161	64.2	46	66.7	0	0.0
Upper	504	26.9	487	26.9	17	24.6	0	0.0
Unknown	4	0.2	4	0.2	0	0.0	0	0.0
Total AA	1,877	100.0	1,808	100.0	69	100.0	0	0.0
Percentage of Total Farms:			96.3		3.7		0.0	

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 34							
DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY							
PORTLAND ASSESSMENT AREA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	1.8	0	0.0	2.1	2.0
Moderate	0	0.0	18.4	0	0.0	18.5	18.4
Middle	3	75.0	40.8	1,342	72.9	42.8	43.7
Upper	1	25.0	38.2	500	27.2	35.5	35.5
Unknown	0	0.0	0.4	0	0.0	0.9	0.5
Tract-Unk	0	0.0	0.5	0	0.0	0.1	
Total	4	100.0	100.0	1,841	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 35							
DISTRIBUTION OF 2024 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES							
PORTLAND ASSESSMENT AREA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	0	0.0	54.0	0+	0.0	29.9	93.2
Over \$1 Million	3	75.0		1,718	93.3		6.1
Revenue Unknown	1	25.0		123	6.7		0.7
Total	4	100.0		1,841	100.0		100.0
By Loan Size							
\$100,000 or Less	0	0.0	95.6	0	0.0	47.2	
\$100,001 - \$250,000	1	25.0	2.4	123	6.7	13.9	
\$250,001 - \$1 Million	3	75.0	2.0	1,718	93.3	38.9	
Total	4	100.0	100.0	1,841	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	0	0.0		0	0.0		

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.