



PUBLIC DISCLOSURE

August 11, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Jones Bank
RSSD# 469559

203 South 6th Street
Seward, Nebraska 68434

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

TABLE OF CONTENTS

Institution's Community Reinvestment Act Rating	2
Scope of Examination	2
Description of Institution	3
Conclusions with Respect to Performance Tests.....	4
Fair Lending or Other Illegal Credit Practices Review	6
Seward County Metropolitan Assessment Area (Full-Scope Review)	
Description of Institution's Operations	7
Conclusions with Respect to Performance Tests	9
Saunders County Metropolitan Assessment Area (Limited-Scope Review)	
Description of Institution's Operations	14
Conclusions with Respect to Performance Tests	14
Appendix A – Map of the Assessment Areas	15
Appendix B – Demographic Information.....	17
Appendix C – Limited-Scope Review Assessment Area Tables	19
Appendix D – Glossary.....	24

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**
The Lending Test is rated: **Satisfactory**
The Community Development Test is rated: **Outstanding**

Jones Bank (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas' (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- An evaluation of the distribution of loans among geographies of different income levels was not conducted as the AAs are comprised entirely of middle-income census tracts.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- Community development (CD) activity reflects excellent responsiveness to CD needs of the bank's AAs.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs.

Performance was assessed within the bank's two AAs. The Seward County AA was assessed using a full-scope review and the Saunders County AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 12-quarter average NLTD ratio;
- The universe of 96 home mortgage loans reported on the bank's 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Register;
- A statistical sample of 69 small business loans from a universe of 105 outstanding loans originated between January 1, 2024, and December 31, 2024;

- A statistical sample of 88 small farm loans from a universe of 155 outstanding loans originated between January 1, 2024, and December 31, 2024; and
- CD loans, qualified investments, and CD services from July 1, 2022, through December 31, 2024.

More weight was placed on the bank's small farm and small business lending based on the overall volume of originations when compared to the universe of home mortgage loans. Furthermore, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is considered representative of the number of entities served.

DESCRIPTION OF INSTITUTION

Jones Bank is a community bank headquartered in Seward, Nebraska. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Jones National Corporation.
- The bank has total assets of \$442.7 million as of March 31, 2025.
- In addition to its main office in Seward, the bank has two full-service branches located in Milford and Valparaiso, Nebraska.
- The bank operates three cash-only automated teller machines (ATMs), one at each bank location.
- As shown in the table below, the bank's primary business focus is commercial and agricultural lending.

Table 1

Composition of Loan Portfolio as of March 31, 2025		
Loan Type	\$(000)	%
Construction and Land Development	23,497	9.2
Farmland	51,899	20.3
1-4 Family Residential Real Estate	40,691	15.9
Multifamily Residential Real Estate	11,864	4.6
Non-Farm Non-Residential Real Estate	31,836	12.5
Agricultural	48,277	18.9
Commercial and Industrial	34,769	13.6
Consumer	7,848	3.1
Other	4,938	1.9
Gross Loans	255,619	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its September 26, 2022 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA¹

LENDING TEST

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Seward County AA (full-scope review) and a brief discussion of performance in the Saunders County AA (limited-scope review).

The bank's overall lending test performance is Satisfactory. In determining the overall lending test rating, equal weight was given to each of the performance criteria that was evaluated. In addition, the bank's HMDA origination volume was too low to conduct a meaningful analysis for individual loan product categories. Instead, the product categories were combined and analyzed at the total home mortgage lending level. For small business and small farm lending, available CRA aggregate data for the most recent three years (2021, 2022, and 2023) was averaged and referenced for additional performance context.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC) insured institutions. The similarly situated institutions were selected based on asset size, loan portfolio composition, and location within or in proximity to the institution's AAs. The bank's NLTD ratio is reasonable. The bank's 12-quarter average NLTD ratio fell within the range of the three similarly situated institutions, with ratios ranging from 55.0 percent to 84.2 percent.

Table 2

Comparative NLTD Ratios June 30, 2022 – March 31, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			12 Quarter Average
Jones Bank	Seward, Nebraska	442,654	64.7
Similarly Situated Institutions			
First Northeast Bank of Nebraska	Lyons, Nebraska	479,224	55.0
Cattle Bank & Trust	Seward, Nebraska	403,674	84.2
FirstBank of Nebraska	Wahoo, Nebraska	455,417	57.6

¹ The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans, by number and dollar, inside the AAs.

Table 3

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Purchase – Conventional	28	60.9	5,732	60.1	18	39.1	3,799	39.9
Home Improvement	0	0.0	0	0.0	3	100.0	463	100.0
Refinancing	33	70.2	6,979	68.6	14	29.8	3,191	31.4
Total HMDA Related	61	63.5	12,711	63.0	35	36.5	7,453	37.0
Small Business	43	62.3	3,486	53.0	26	37.7	3,086	47.0
Small Farm	53	60.2	6,220	54.1	35	39.8	5,269	45.9
Total Loans	157	62.1	22,418	58.6	96	37.9	15,807	41.4
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. However, the bank's performance under this criterion was not assessed as the AAs are comprised entirely of middle-income census tracts and a meaningful analysis could not be conducted.

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses and farms of different sizes. Performance in the bank's limited-scope Saunders County AA was consistent with the bank's overall performance.

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank's responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities in the bank's AAs. The bank's overall CD test performance is Outstanding and demonstrates excellent responsiveness.

The overall rating was driven primarily by the bank's performance in the full-scope Seward County AA, where the bank's performance demonstrated excellent responsiveness to the credit needs of the AA through qualified loans, investments, and CD services. CD activity in the limited-scope Saunders County AA was below the bank's overall performance, although this did not impact the overall rating.

Activities that were qualified within the bank's AAs consisted of loans that were primarily focused on economic development efforts and community development services. In addition, the bank also received credit for additional qualified loans and investments in the broader regional area outside of the delineated AAs. This included loans that were focused on revitalization and stabilization in underserved and distressed areas, as well as investments in the form of school bonds.

Table 4

Community Development Activity - All									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	3
Community Services	0	0	1	365	1	0	2	365	8
Economic Development	3	10,013	0	0	0	0	0	0	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0	0
Outside Activities	6	1,395	10	2,305	0	0	10	2,305	0
Totals	9	11,408	11	2,670	1	0	12	2,670	12

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**SEWARD COUNTY ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SEWARD COUNTY
AA**

The bank's Seward County AA consists of Seward County in its entirety, which is one of the two counties that make up the Lincoln, Nebraska Metropolitan Statistical Area (MSA). See Appendix A for an AA map and Appendix B for additional demographic data.

- There have been no changes to the AA delineation since the prior CRA evaluation.
- The AA is comprised of four middle-income census tracts. At the prior evaluation, the AA was comprised of three middle- and one upper-income census tracts.
- The bank operates two full-service branch locations in the AA located in Seward and Milford. The bank also operates cash-only ATMs at these locations.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank has a market share of 22.4 percent, ranking 2nd out of 5 institutions operating in the AA.
- To further augment the CRA evaluation, an interview with a member of the community in which the bank operates was conducted during the evaluation. The community member had knowledge of the local housing market and housing needs of the community.

Table 5

Population Change Assessment Area: Seward County			
Area	2015 Population	2020 Population	Percent Change
Seward County	16,998	17,609	3.6
Lincoln, NE MSA	315,078	340,217	8.0
Nebraska	1,869,365	1,961,504	4.9
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The major population centers in the AA include Seward, the county seat, at 7,643 residents, followed by Milford with 2,155 residents and Utica with 840 residents.
- As illustrated in Table 5, the AA 2020 population accounts for 5.2 percent of the Lincoln MSA.
- In the AA, people age 65 and older account for 16.9 percent of the population, compared to the Lincoln MSA figure of 13.8 percent.

Table 6

Median Family Income Change Assessment Area: Seward County			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Seward County	79,994	88,497	10.6
Lincoln, NE MSA	76,699	82,381	7.4
Nebraska	73,448	80,125	9.1
Source: 2011 - 2015 U.S. Census Bureau: American Community Survey 2016 - 2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- Growth in the AA median family income from 2015 to 2020 exceeded both the Lincoln MSA and the statewide figure.
- The AA has a smaller portion of families living below the poverty level at 4.1 percent, compared to the Lincoln MSA and statewide figures, which were both at 6.6 percent.

Table 7

Housing Cost Burden Assessment Area: Seward County						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Seward County	57.4	19.0	29.4	59.1	18.3	12.4
Lincoln, NE MSA	78.3	25.8	39.9	62.6	28.5	14.9
Nebraska	73.1	27.0	37.0	61.7	28.6	16.1
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						

- The AA has a lower housing cost burden for renters compared to the Lincoln MSA. The AA has a median gross rent of \$778, compared to the Lincoln MSA figure of \$869.
- The AA has a median housing value of \$172,861, which is 8.4 percent less than the Lincoln MSA figure of \$188,687.
- A community representative noted that homes in the area have increased in value over a relatively short period of time, making the housing market competitive for potential buyers.

Table 8

Unemployment Rates Assessment Area: Seward County					
Area	2020	2021	2022	2023	2024
Seward County	3.8	2.4	1.9	1.9	2.3
Lincoln, NE MSA	4.2	2.5	2.0	2.1	2.5
Nebraska	4.3	2.6	2.2	2.3	2.8
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates in the AA declined from 2021 to 2023 after higher levels of unemployment in 2020. Recently, unemployment rates have slightly increased but have remained relatively stable, which is consistent with the Lincoln MSA and statewide figures.
- Major industries in the AA include educational services, health care, manufacturing, and construction.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SEWARD COUNTY AA

LENDING TEST

The bank's overall lending test performance in the Seward County AA is reasonable. This conclusion was based on a reasonable distribution of loans to individuals of different income levels and to businesses and farms of different revenue sizes.

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

The bank's lending has a reasonable distribution among individuals of different income levels and businesses and farms of different sizes. The borrower distribution of home mortgage lending and small business lending is reasonable, while the borrower distribution of small farm lending is excellent.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2024 home mortgage lending to low-income borrowers was comparable to aggregate lending by number and dollar, and below the demographic figure, which represents the percentage of families by income level in the AA. Lending to moderate-income borrowers was below aggregate lending by number and dollar, as well as the demographic figure. The borrower distribution of 2023 home mortgage lending reflected performance that was consistent with 2024 performance. A community representative provided additional

insight into the local housing market noting that the area faces rising home values and a competitive market.

Table 9

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Seward County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	2	25.0	9.6	407	24.5	6.9	2	11.1	12.3	506	13.2	8.0	14.0
Moderate	1	12.5	30.4	221	13.3	24.0	0	0.0	20.1	0	0.0	15.2	18.2
Middle	2	25.0	17.5	544	32.8	19.4	4	22.2	20.9	842	22.0	20.8	26.6
Upper	1	12.5	19.6	149	9.0	26.7	5	27.8	22.8	987	25.8	33.3	41.2
Unknown	2	25.0	22.9	338	20.4	22.9	7	38.9	23.9	1,488	38.9	22.7	0.0
Total	8	100.0	100.0	1,659	100.0	100.0	18	100.0	100.0	3,823	100.0	100.0	100.0
Refinance Loans													
Low	2	11.1	10.8	305	7.8	7.6	0	0.0	3.8	0	0.0	1.5	14.0
Moderate	6	33.3	28.0	756	19.2	18.2	2	15.4	15.4	110	4.3	8.5	18.2
Middle	2	11.1	22.6	255	6.5	20.1	4	30.8	18.3	325	12.8	12.5	26.6
Upper	7	38.9	32.3	2,517	64.0	48.5	4	30.8	34.6	1,428	56.2	37.7	41.2
Unknown	1	5.6	6.5	100	2.5	5.6	3	23.1	27.9	677	26.7	39.8	0.0
Total	18	100.0	100.0	3,933	100.0	100.0	13	100.0	100.0	2,540	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	12.0	0	0.0	3.8	0	0.0	0.0	0	0.0	0.0	14.0
Moderate	0	0.0	12.0	0	0.0	13.1	0	0.0	27.8	0	0.0	18.0	18.2
Middle	0	0.0	24.0	0	0.0	21.5	0	0.0	33.3	0	0.0	31.2	26.6
Upper	0	0.0	44.0	0	0.0	52.1	0	0.0	33.3	0	0.0	31.2	41.2
Unknown	0	0.0	8.0	0	0.0	9.4	0	0.0	5.6	0	0.0	19.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	15.4	10.3	712	12.7	7.2	2	6.5	9.6	506	8.0	6.2	14.0
Moderate	7	26.9	27.9	977	17.5	22.3	2	6.5	19.0	110	1.7	13.4	18.2
Middle	4	15.4	19.9	799	14.3	19.7	8	25.8	21.2	1,167	18.3	18.7	26.6
Upper	8	30.8	24.9	2,666	47.7	32.2	9	29.0	27.1	2,415	38.0	34.9	41.2
Unknown	3	11.5	17.0	438	7.8	18.6	10	32.3	23.2	2,165	34.0	26.8	0.0
Total	26	100.0	100.0	5,592	100.0	100.0	31	100.0	100.0	6,363	100.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of \$1 million or less was comparable to the demographic figure, which represents the percentage of businesses in the AA by revenue size. In addition, 94.6 percent of loans were in amounts of \$250,000 or less, which are credit amounts typically requested by smaller entities and demonstrates the bank's willingness to meet the needs of small businesses.

Table 10

Distribution of 2024 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Seward County					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	27	73.0	2,375	73.1	90.0
Over \$1 Million	5	13.5	825	25.4	7.1
Revenue Unknown	5	13.5	51	1.6	2.9
Total	37	100.0	3,251	100.0	100.0
By Loan Size					
\$100,000 or Less	27	73.0	929	28.6	
\$100,001 - \$250,000	8	21.6	1,297	39.9	
\$250,001 - \$1 Million	2	5.4	1,025	31.5	
Total	37	100.0	3,251	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	19	70.4	828	34.9	
\$100,001 - \$250,000	7	25.9	1,172	49.3	
\$250,001 - \$1 Million	1	3.7	375	15.8	
Total	27	100.0	2,375	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.					

Small Farm Lending

The borrower distribution of small farm lending is excellent. The bank's lending to farms with revenues of \$1 million or less was comparable to the demographic figure, which represents the percentage of farms in the AA by revenue size. However, a review of the three-year average aggregate lending data submitted by CRA reporters in the bank's AA noted a lending distribution of 47.2 percent of loans by number and 61.5 percent by dollar to small farms. While not a direct comparator as the bank is not a CRA reporter, aggregate lending data was utilized as additional context and indicates limited demand for small farm credit in the AA. This context further supports the bank's excellent lending performance.

Table 11

Distribution of 2024 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Seward County					
	Bank Loans				Total Farms %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	30	90.9	3,329	81.9	97.1
Over \$1 Million	3	9.1	734	18.1	2.9
Revenue Unknown	0	0.0	0	0.0	0.0
Total	33	100.0	4,064	100.0	100.0
By Loan Size					
\$100,000 or Less	21	63.6	799	19.7	
\$100,001 - \$250,000	6	18.2	975	24.0	
\$250,001 - \$500,000	6	18.2	2,289	56.3	
Total	33	100.0	4,064	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	20	66.7	764	22.9	
\$100,001 - \$250,000	6	20.0	975	29.3	
\$250,001 - \$500,000	4	13.3	1,590	47.8	
Total	30	100.0	3,329	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

The bank's CD performance demonstrates excellent responsiveness, especially considering that opportunities are more limited in this more rural county of the MSA. Examples of qualified activities include:

- Loans to support the construction of a local wellness center and the construction of a local business that provide jobs to LMI individuals.
- A bank loan officer served on the board of an affordable housing organization that provides downpayment assistance to LMI borrowers in the AA.
- A bank loan officer served on the board of a local economic development organization focused on providing housing assistance and essential community services for LMI residents.

Table 12

Community Development Activity Assessment Area: Seward County AA									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	3
Community Services	0	0	1	365	1	0	2	365	8
Economic Development	3	10,013	0	0	0	0	0	0	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0	0
Totals	3	10,013	1	365	1	0	2	365	12

**SAUNDERS COUNTY ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAUNDERS COUNTY
AA**

The Saunders County AA is comprised of one census tract in western Saunders County. Saunders County is one of eight counties that comprise the Omaha-Council Bluffs, Nebraska-Iowa MSA. See Appendix A for a map of the AA and Appendix C for demographic and lending data.

- The AA consists of one middle-income census tract, which is unchanged from the previous evaluation.
- The bank operates one full-service branch and one cash-only ATM in the town of Valparaiso, Nebraska.
- Based on 2020 American Community Survey data, the AA population of 5,282 residents represents a small portion of the broader Omaha-Council Bluffs, Nebraska-Iowa MSA, which has a population of 967,604 residents. Additionally, low-income families represent 20.5 percent of the population, followed by 17.3 percent moderate-, 30.7 percent middle-, and 31.5 percent upper-income families.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank ranked 5th of 14 FDIC-insured depository institutions in Saunders County with a market share of 9.5 percent.

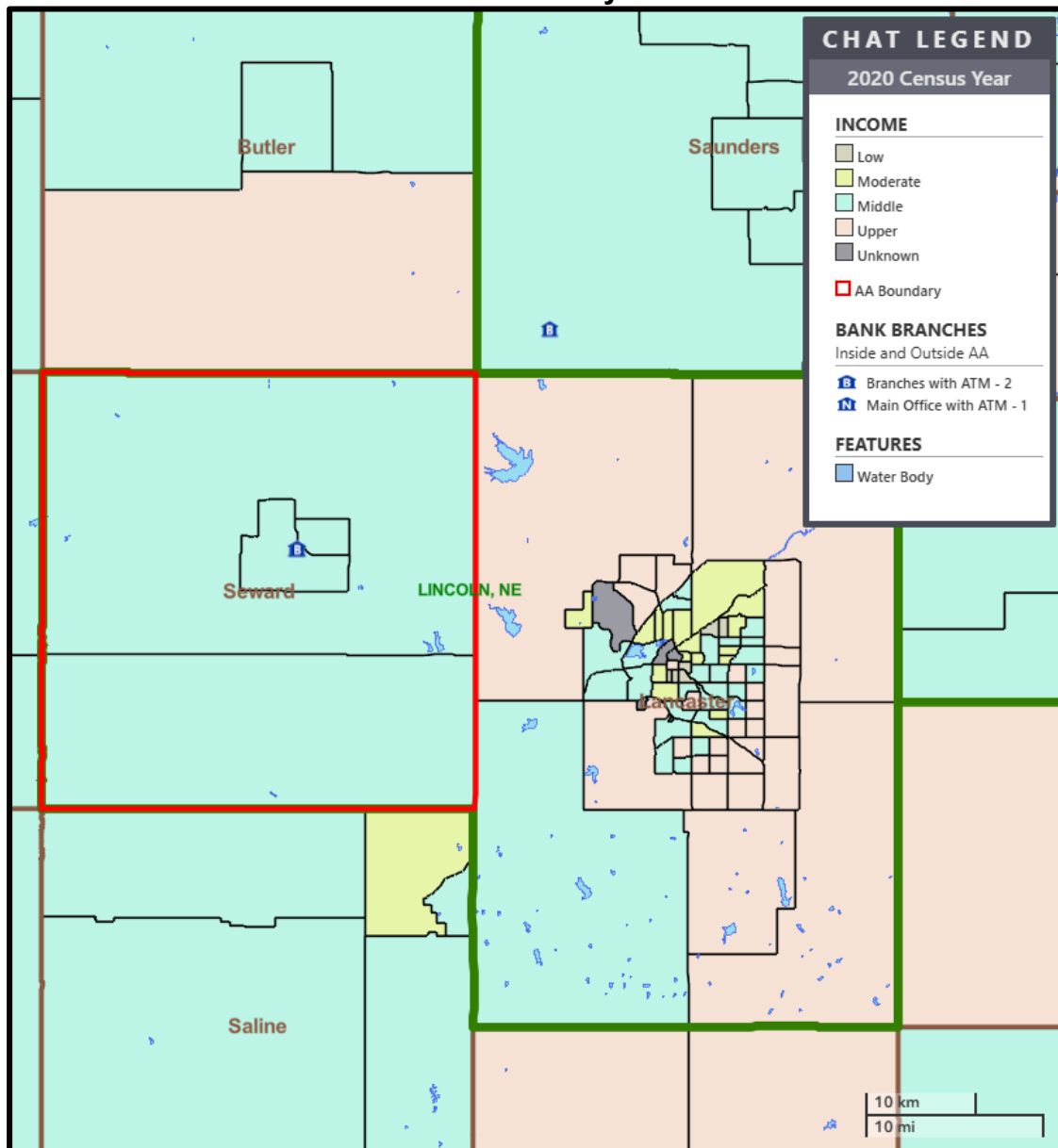
**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SAUNDERS
COUNTY AA**

The institution's lending performance in the area is consistent with the institution's lending performance overall.

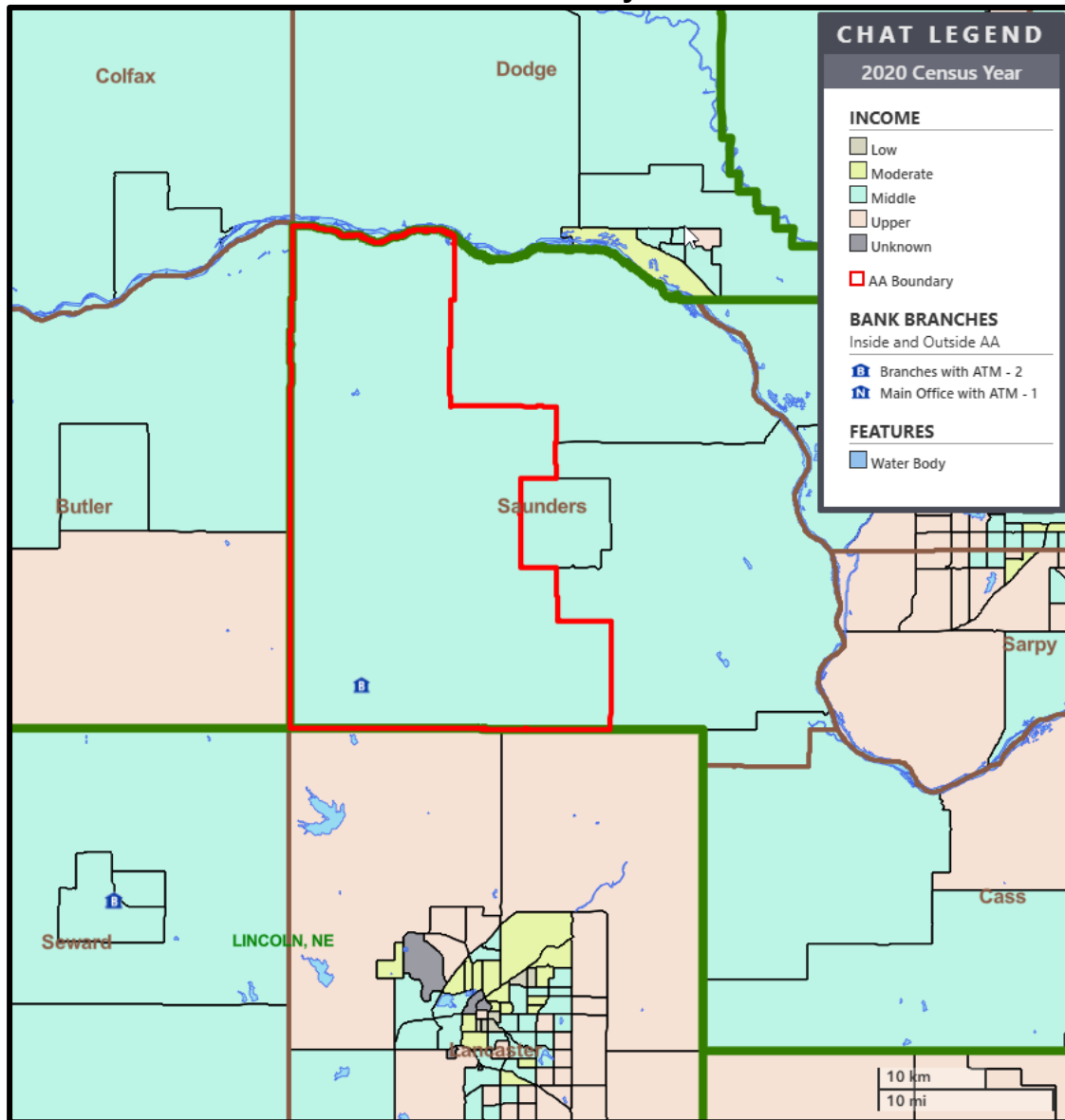
The institution's community development performance in the area is below the CD performance for the institution; however, this does not impact the rating for the overall institution.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1
Seward County AA



Map A-2
Saunders County AA



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2024 Seward County AA Demographics								
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	656	14.0
Moderate	0	0.0	0	0.0	0	0.0	853	18.2
Middle	4	100.0	4,693	100.0	194	4.1	1,250	26.6
Upper	0	0.0	0	0.0	0	0.0	1,934	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	4,693	100.0	194	4.1	4,693	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	7,231	4,819	100.0	66.6	1,947	26.9	465	6.4
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
Total AA	7,231	4,819	100.0	66.6	1,947	26.9	465	6.4
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	802	100.0	722	100.0	57	100.0	23	100.0
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
Total AA	802	100.0	722	100.0	57	100.0	23	100.0
Percentage of Total Businesses:				90.0		7.1		2.9
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	174	100.0	169	100.0	5	100.0	0	0.0
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
Total AA	174	100.0	169	100.0	5	100.0	0	0.0
Percentage of Total Farms:				97.1		2.9		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.								

Table B-2

2023 Seward County AA Demographics								
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	656	14.0
Moderate	0	0.0	0	0.0	0	0.0	853	18.2
Middle	4	100.0	4,693	100.0	194	4.1	1,250	26.6
Upper	0	0.0	0	0.0	0	0.0	1,934	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	4,693	100.0	194	4.1	4,693	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	7,231	4,819	100.0	66.6	1,947	26.9	465	6.4
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
Total AA	7,231	4,819	100.0	66.6	1,947	26.9	465	6.4
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	853	100.0	770	100.0	60	100.0	23	100.0
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
Total AA	853	100.0	770	100.0	60	100.0	23	100.0
Percentage of Total Businesses:				90.3		7.0		2.7
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	176	100.0	171	100.0	5	100.0	0	0.0
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
Total AA	176	100.0	171	100.0	5	100.0	0	0.0
Percentage of Total Farms:				97.2		2.8		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table C-1

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Saunders County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	0	0.0	13.3	0	0.0	7.6	1	50.0	15.3	431	74.2	11.0	20.5
Moderate	0	0.0	20.4	0	0.0	16.9	0	0.0	26.0	0	0.0	18.2	17.2
Middle	2	100.0	32.7	175	100.0	31.3	0	0.0	24.7	0	0.0	24.2	30.7
Upper	0	0.0	21.2	0	0.0	32.2	1	50.0	22.0	150	25.8	31.8	31.5
Unknown	0	0.0	12.4	0	0.0	12.0	0	0.0	12.0	0	0.0	14.9	0.0
Total	2	100.0	100.0	175	100.0	100.0	2	100.0	100.0	581	100.0	100.0	100.0
Source: 2024 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.													

Table C-2

Distribution of 2024 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Saunders County					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	5	83.3	185	78.7	88.7
Over \$1 Million	1	16.7	50	21.3	5.0
Revenue Unknown	0	0.0	0	0.0	6.3
Total	6	100.0	235	100.0	100.0
By Loan Size					
\$100,000 or Less	6	100.0	235	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	6	100.0	235	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	5	100.0	185	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	5	100.0	185	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.					

Table C-3

Distribution of 2024 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Saunders County					
	Bank Loans				Total Farms %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	19	95.0	1,956	90.7	99.1
Over \$1 Million	1	5.0	200	9.3	0.9
Revenue Unknown	0	0.0	0	0.0	0.0
Total	20	100.0	2,157	100.0	100.0
By Loan Size					
\$100,000 or Less	12	60.0	441	20.4	
\$100,001 - \$250,000	6	30.0	1,024	47.5	
\$250,001 - \$500,000	2	10.0	691	32.0	
Total	20	100.0	2,157	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	12	63.2	441	22.5	
\$100,001 - \$250,000	5	26.3	824	42.1	
\$250,001 - \$500,000	2	10.5	691	35.3	
Total	19	100.0	1,956	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.					

Table C-4

2024 Saunders County AA Demographics								
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	306	20.5
Moderate	0	0.0	0	0.0	0	0.0	257	17.2
Middle	1	100.0	1,490	100.0	65	4.4	457	30.7
Upper	0	0.0	0	0.0	0	0.0	470	31.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1	100.0	1,490	100.0	65	4.4	1,490	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,473	1,874	100.0	75.8	280	11.3	319	12.9
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
Total AA	2,473	1,874	100.0	75.8	280	11.3	319	12.9
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	222	100.0	197	100.0	11	100.0	14	100.0
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
Total AA	222	100.0	197	100.0	11	100.0	14	100.0
Percentage of Total Businesses:				88.7		5.0		6.3
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	117	100.0	116	100.0	1	100.0	0	0.0
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
Total AA	117	100.0	116	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.1		0.9		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.								

Table C-5

2023 Saunders County AA Demographics								
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	306	20.5
Moderate	0	0.0	0	0.0	0	0.0	257	17.2
Middle	1	100.0	1,490	100.0	65	4.4	457	30.7
Upper	0	0.0	0	0.0	0	0.0	470	31.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1	100.0	1,490	100.0	65	4.4	1,490	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,473	1,874	100.0	75.8	280	11.3	319	12.9
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
Total AA	2,473	1,874	100.0	75.8	280	11.3	319	12.9
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	236	100.0	209	100.0	12	100.0	15	100.0
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
Total AA	236	100.0	209	100.0	12	100.0	15	100.0
Percentage of Total Businesses:				88.6		5.1		6.4
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	124	100.0	123	100.0	1	100.0	0	0.0
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
Total AA	124	100.0	123	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX D – GLOSSARY

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: 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives 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 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, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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 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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. 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 Consolidated Reports of Condition and Income (Call Report) instructions. 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.