



PUBLIC DISCLOSURE

December 15, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

RSNB Bank
RSSD# 550952

200 Second Street
Rock Springs, Wyoming 82901

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 2
Description of Assessment Area 3
Conclusions With Respect to Performance Criteria 5
Fair Lending or Other Illegal Credit Practices Review 9
Appendix A – Map of the Assessment Area 10
Appendix B – Demographic Information..... 11
Appendix C – Glossary..... 12

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

RSNB Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A substantial majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among businesses 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.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for 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. In addition, available aggregate data for the most recent three years (2023, 2022, and 2021) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's only AA. Examiners reviewed the following data:

- The bank's 12-quarter average NLTD ratio.
- A universe of 58 outstanding small business loans originated between January 1, 2024 through December 31, 2024.

DESCRIPTION OF INSTITUTION

RSNB Bank is a community bank headquartered in Rock Springs, Wyoming. The bank's characteristics include:

- The bank is a wholly owned subsidiary of RSNB Bancorp.
- The bank has total assets of \$369.3 million as of June 30, 2025.
- The bank's main office and a limited-service branch are both located in Rock Springs, Wyoming.
- The bank operates two automated teller machines, one at each bank location.
- As shown in the table below, the bank's primary business focus is commercial lending.

Table 1

Composition of Loan Portfolio as of June 30, 2025		
Loan Type	\$(000)	%
Construction and Land Development	30,474	20.8
Farmland	964	0.7
1- to 4-Family Residential Real Estate	24,638	16.8
Multifamily Residential Real Estate	377	0.3
Nonfarm Nonresidential Real Estate	57,925	39.6
Agricultural	2,485	1.7
Commercial and Industrial	24,993	17.1
Consumer	3,742	2.6
Other	695	0.5
Gross Loans	146,293	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 December 12, 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.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Sweetwater County AA consists of Sweetwater County in its entirety (see Appendix A for an AA map and Appendix B for additional demographic data).

- No changes to the delineation of the AA occurred since the previous evaluation.
- The AA consists of one moderate-, seven middle-, and five upper-income census tracts.
- The income designations of census tracts have changed since the previous examination due to updated 2016-2020 American Community Survey data. At the previous evaluation, the bank’s AA contained 12 total census tracts, including seven middle- and five upper-income census tracts.
- According to the June 30, 2025 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank maintains a 32.7 percent deposit market share and ranks first out of nine FDIC-insured depository institutions operating within the AA.
- To further augment the CRA performance evaluation, an interview with a member of the community in which the bank operates was conducted during the evaluation. The community member represented a local government within the AA.

Table 2

Population Change			
Assessment Area: Sweetwater County			
Area	2015 Population	2020 Population	Percent Change
Sweetwater County	44,772	42,272	(5.6)
NonMSA Wyoming	404,237	396,384	(1.9)
Wyoming	579,679	576,851	(0.5)

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

- The AA had a slight decline in population between 2015 and 2020.
- In addition to being the location of both bank branches, the major population center within the AA is Rock Springs, with 23,526 residents in 2020.
- The community member noted that Sweetwater County struggles to retain younger members of the population and that many are moving to larger urban areas with more job opportunities.

Table 3

Median Family Income Change			
Assessment Area: Sweetwater County			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Sweetwater County	88,196	89,898	1.9
NonMSA Wyoming	79,576	81,346	2.2
Wyoming	79,970	81,290	1.7

*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.

- The percentage of LMI families in the AA, at 33.4 percent, is lower than the figure for other rural Wyoming counties and the statewide figure of 38.1 and 37.7 percent, respectively.
- The percentage of families living below the poverty line in the AA, at 9.1 percent, is higher than the figure for other rural Wyoming counties and the statewide figure at 6.9 and 6.7 percent, respectively.

Table 4

Housing Cost Burden						
Assessment Area: Sweetwater County						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Sweetwater County	71.3	8.6	30.7	49.5	14.9	12.5
NonMSA Wyoming	65.8	21.4	34.8	50.9	24.6	16.4
Wyoming	68.7	24.1	36.4	53.9	28.2	17.2

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

- As indicated in Table 4, 30.7 percent of all renters pay more than 30.0 percent of their household income on rent, compared to 34.8 percent of all renters in other rural Wyoming counties and 36.4 percent of all renters statewide. This indicates housing is slightly more affordable in the AA.
- The AA median housing value of \$205,112 is below the figure for other rural Wyoming counties at \$224,863 and the statewide figure of \$228,000.

Table 5

Unemployment Rates					
Assessment Area: Sweetwater County					
Area	2020	2021	2022	2023	2024
Sweetwater County	7.2	5.4	3.8	3.2	3.5
NonMSA Wyoming	5.7	4.4	3.4	2.9	3.2
Wyoming	5.9	4.5	3.4	2.9	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- As indicated in Table 5, the unemployment rate in the AA has decreased since 2020, and it trended similarly to other rural Wyoming areas and the overall statewide figures year-over-year.
- According to the U.S. Census Bureau, major industries in the AA include educational services, healthcare and social assistance, mining/oil and gas extraction, and retail trade.
- The largest employers include Sweetwater County School District #1, Genesis Alkali, Western Wyoming Community College, Memorial Hospital of Sweetwater County, and Tata Chemicals.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank’s overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD ratio, a substantial majority of loans originated within the bank’s AA, as well as a reasonable geographic and borrower distribution of loans.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending considering performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and location.

The bank’s NLTD ratio is reasonable. RSNB Bank’s average NLTD is within the range of similarly situated banks and is considered reasonable given performance context. After reviewing the percentage of the bank’s unused commitments compared to total assets against the similarly situated institutions, the bank’s percentage of total loans that are unused is higher than all other comparison banks, which helps explain its lower NLTD ratio. Unused commitments represent credit the bank has agreed to extend that is not reflected on the balance sheet.

Table 6

Comparative NLTD Ratios September 30, 2022 – June 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			12 Quarter Average
RSNB Bank	Rock Springs, WY	369,334	38.6
Similarly Situated Institutions			
Uinta Bank	Mountain View, WY	208,367	35.7
Bank of Commerce	Rawlins, WY	197,685	56.0
RNB State Bank	Rawlins, WY	271,140	62.1

Assessment Area Concentration

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

Table 7

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Small Business	54	93.1	11,141	93.3	4	6.9	795	6.7
Total Loans	54	93.1	11,141	93.3	4	6.9	795	6.7

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

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank's lending to the AA's single moderate income census tract is below the demographic figure. For additional context, aggregate lending data reported by CRA reporters in the market over a three-year period was reviewed to ascertain local demand for credit, and this data reflected that only 4.3 percent of loans over the three-year period were originated in this moderate-income census tract. While not a direct comparison to the bank, as the bank is not a CRA reporter, this data indicates limited credit demand in this census tract, supporting the overall reasonable rating. Further, the moderate-income census tract contains the Seedskafee National Wildlife Refuge, located along 36 miles of the Green River and is 26,210 acres in total. This limits the number of businesses that can operate in this tract and therefore limits the bank's opportunity to extend credit in this geography. Lastly, a member of the community stated that overall small business credit demand is fairly limited in the AA due to high land values and a shrinking labor pool. These circumstances make sustaining a small business in the AA difficult and support the bank’s reasonable performance. An analysis of the dispersion of small business loans revealed no conspicuous gaps or lapses in lending throughout the AA.

Table 8

Distribution of 2024 Small Business Lending By Income Level of Geography					
Assessment Area: Sweetwater County					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	2	3.7	284	2.5	9.9
Middle	20	37.0	3,933	35.3	54.4
Upper	32	59.3	6,923	62.1	35.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	54	100.0	11,141	100.0	100.0

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

Lending to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to businesses of different revenue sizes. The bank’s lending has a reasonable distribution among businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. At 40.7 percent, the bank’s lending to businesses with \$1 million or less in revenue is below the demographic figure at 89.1 percent. However, three-year average CRA aggregate lending data, as submitted by reporters in the AA, was reviewed to ascertain local demand for credit. While not a direct comparison to the bank, as the bank is not a CRA reporter, this data indicated that 47.7 percent of loans by number and 27.7 percent of loans by dollar were made to businesses with revenues of \$1 million or less, which supports the bank’s reasonable performance.

Table 9

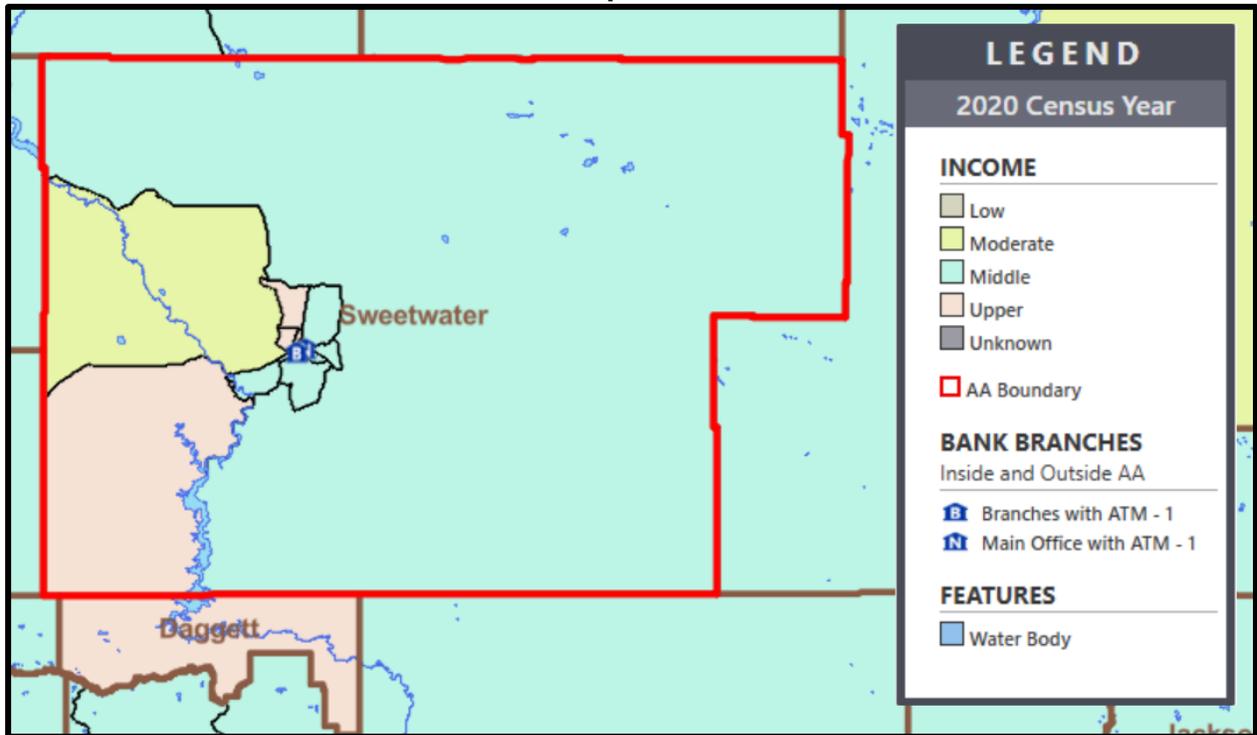
Distribution of 2024 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Sweetwater County					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	22	40.7	4,210	37.8	89.1
Over \$1 Million	28	51.9	6,193	55.6	9.7
Revenue Unknown	4	7.4	738	6.6	1.2
Total	54	100.0	11,141	100.0	100.0
By Loan Size					
\$100,000 or Less	30	55.6	1,544	13.9	
\$100,001 - \$250,000	5	9.3	1,054	9.5	
\$250,001 - \$1 Million	19	35.2	8,543	76.7	
Total	54	100.0	11,141	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	13	59.1	480	11.4	
\$100,001 - \$250,000	3	13.6	647	15.4	
\$250,001 - \$1 Million	6	27.3	3,083	73.2	
Total	22	100.0	4,210	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016 - 2020 U.S. Census Bureau: American Community Survey</i>					

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.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2024 Sweetwater 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	2,020	19.1	
Moderate	1	7.7	928	8.8	198	21.3	1,506	14.3	
Middle	7	53.8	4,494	42.5	406	9.0	2,190	20.7	
Upper	5	38.5	5,143	48.7	361	7.0	4,849	45.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	13	100.0	10,565	100.0	965	9.1	10,565	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	1,494	817	6.9	54.7	359	24.0	318	21.3	
Middle	10,377	5,855	49.4	56.4	1,700	16.4	2,822	27.2	
Upper	7,971	5,180	43.7	65.0	1,815	22.8	976	12.2	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	19,842	11,852	100.0	59.7	3,874	19.5	4,116	20.7	
	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	158	9.9	138	9.7	13	8.4	7	36.8	
Middle	866	54.4	768	54.1	90	58.1	8	42.1	
Upper	569	35.7	513	36.2	52	33.5	4	21.1	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	1,593	100.0	1,419	100.0	155	100.0	19	100.0	
Percentage of Total Businesses:				89.1		9.7		1.2	
	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	7	30.4	7	30.4	0	0.0	0	0.0	
Middle	13	56.5	13	56.5	0	0.0	0	0.0	
Upper	3	13.0	3	13.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	23	100.0	23	100.0	0	0.0	0	0.0	
Percentage of Total Farms:				100.0		0.0		0.0	
<p>Source: 2024 FFIEC Census Data 2016 - 2020 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>									

APPENDIX C – 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.