

PUBLIC DISCLOSURE

February 9, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Montgomery Bank
RSSD# 613558**

**1 Montgomery Bank Plaza Street
Sikeston, Missouri 63801**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the 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'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

The Lending Test is rated:

Satisfactory

The Community Development Test is rated:

Outstanding

Montgomery Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending and community development activities. The factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment areas.
- A majority of loans and other lending-related activities are in the assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects reasonable penetration among customers of different income levels (including low- and moderate-income (LMI)) and businesses of different revenue sizes.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank's overall community development performance demonstrates excellent responsiveness to the community development needs of its assessment areas, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas. The bank has responded to these needs through community development loans, qualified investments, and community development services.

INSTITUTION

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) intermediate small bank procedures, which entail two performance tests: the Lending Test and the Community Development Test. Bank performance under these tests is rated at the institution level. The bank maintains operations in three delineated assessment areas within the state of Missouri.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each assessment area reviewed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2025.

Distribution of Bank Branches/Deposits					
Assessment Area	Branches		Deposits \$ (000s)		Review Procedures
Partial St. Louis MSA	7	58.3%	\$321,504	31.0%	Full Scope
Southeast Missouri	2	16.7%	\$386,441	37.3%	Full Scope
Cape Girardeau County	3	25.0%	\$327,637	31.6%	Limited Scope
TOTAL¹	12	100%	\$1,035,582	100%	2 – Full Scope

While the largest portion of the bank’s deposit dollars is in the Southeast Missouri assessment area (37.3 percent), most bank branches are in the St. Louis assessment area, as displayed in the table above. Furthermore, 50.8 percent of the bank’s 2024 home mortgage and small business loan activity, the primary sources of lending data used for this evaluation, was in the St. Louis assessment area. Considering these circumstances, performance in the St. Louis assessment area was given primary consideration when making overall rating decisions.

As previously mentioned, home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small business loans were used to evaluate the bank’s lending performance, as these loan categories are considered the bank’s core business lines based on lending volume and business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of the bank’s overall lending performance. However, as supported by a significantly higher volume of HMDA lending activity during the review period, performance based on the HMDA loan category carried the most weight toward the bank’s overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

¹ Note: In this table and others throughout this document, percentages may not total 100 percent due to rounding.

Performance Criterion	Time Period
LTD Ratio	June 30, 2023 – December 31, 2025
Assessment Area Concentration	January 1, 2024 – December 31, 2024
Loan Distribution by Borrower’s Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	May 1, 2023 – February 8, 2026
Community Development Activities	

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation.

- Assessment area demographics are based on 2020 American Community Survey (ACS) data, and business demographics are based on 2024 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC’s 2024 annual estimates, which were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.
- Industry demographics are sourced from the U.S. Department of Labor, Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages data, according to the North American Industry Classification System.
- Unemployment data are sourced from the BLS and are not seasonally adjusted.
- Housing cost burden refers to the percentage of households with housing costs that exceed 30.0 percent of total household income. These figures are sourced from the U.S. Department of Housing and Urban Development (HUD) 2017–2021 Comprehensive Housing Affordability Strategy data.
- In the evaluation of the bank’s distribution of loans to borrowers of different income levels and businesses of different revenue sizes, the demographic figure refers to either the percentage of families in that assessment area that are classified as LMI or the percentage of businesses with annual revenues of \$1 million or less.
- In the evaluation of the bank’s geographic distribution of loans, the demographic figure refers to either the percentage of owner-occupied housing units in that assessment area that are in LMI census tracts or the percentage of businesses located in LMI census tracts.

When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant

comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$880.7 million to \$968.0 million as of December 31, 2025.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas:

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date. In addition, investments made prior to the date of the previous CRA evaluation, but still in the bank's portfolio as of this review date, were also considered.

To augment this evaluation, two community contact interviews were utilized. These interviews were with representatives from organizations located in the bank's full-scope review assessment areas, and such information was used to ascertain specific credit needs, opportunities, and local market conditions within these areas. Furthermore, performance context gained from these interviews also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the assessment area in which they were conducted.

DESCRIPTION OF INSTITUTION

The bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is a wholly owned subsidiary of Montgomery Bancorporation, Inc., a single-bank holding company. Both entities are headquartered in Sikeston, Missouri. The bank operates 12 offices (including its headquarters) across three assessment areas, all within the state of Missouri. Lastly, the bank did not open or close any branch offices during this review period.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of December 31, 2025, the bank reported total assets of \$1.2 billion. As of the same date, loans and leases outstanding were \$1.0 billion (85.2 percent of total assets), and deposits totaled \$1.0 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of December 31, 2025		
Credit Category	Amount \$ (000s)	Percentage of Total Loans
Commercial Real Estate	\$343,535	33.6%
1-4 Family Residential	\$304,194	29.7%
Commercial and Industrial	\$143,720	14.1%
Construction and Development	\$72,968	7.1%
Multifamily Residential	\$60,669	5.9%
Farmland	\$59,182	5.8%
Farm Loans	\$33,119	3.2%
Loans to Individuals	\$4,263	0.4%
Total Other Loans	\$957	0.1%
TOTAL	\$1,022,607	100%

As indicated by the table above, significant portions of the bank's lending resources are directed to the commercial real estate, 1-4 family residential real estate, and commercial and industrial loan categories.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on May 1, 2023.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank meets the standards for a satisfactory Lending Test rating under the intermediate small bank procedures, which evaluate bank performance under the following five criteria, as applicable.

Loan-to-Deposit Ratio

One indication of the bank’s overall level of lending activity is its LTD ratio. The following table displays the bank’s average LTD ratio in comparison to those of regional peers. The average LTD ratio represents an 11-quarter average, dating back to the bank’s last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size \$ (000s)	Average LTD Ratio
Montgomery Bank	Sikeston, Missouri	\$1,199,730	92.4%
LTD Peers	Hannibal, Missouri	\$967,999	77.4%
	St. Louis, Missouri	\$939,830	69.0%
	Charleston, Missouri	\$880,651	107.8%

Based on data from the previous table, the bank’s level of lending is in line with those of similarly situated banks. During the review period, the bank’s quarterly LTD ratio experienced a generally increasing trend, with an 11-quarter average of 92.4 percent. In comparison, the average LTD ratios for the selected peers ranged from 69.0 percent to 107.8 percent, placing the bank’s average LTD ratio performance within this range. Therefore, compared to data from similar peers, the bank’s average LTD ratio is reasonable given the bank’s size, financial condition, and credit needs of its assessment areas.

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank’s assessment areas.

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
HMDA	298	87.4	52,177	75.2	43	12.6	17,201	24.8
Small Business	74	85.1	14,313	83.0	13	14.9	2,933	17.0
TOTAL LOANS	372	86.9	66,490	76.8	56	13.1	20,134	23.2

A majority of loans and other lending-related activities were made in the bank’s assessment areas. As indicated in the previous table, 86.9 percent of the total loans reviewed were made inside the assessment areas, accounting for 76.8 percent of the dollar volume of total loans.

Borrower and Geographic Distribution

Overall, the bank’s distribution of loans by borrower’s income/revenue profile is reasonable, as displayed in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower’s Profile
St. Louis	Reasonable
Southeast Missouri	Reasonable
OVERALL	REASONABLE

Limited-Scope Assessment Area	Loan Distribution by Borrower’s Profile
Cape Girardeau County	Below

As displayed in the following tables, the bank’s overall geographic distribution of loans is excellent.

Full-Scope Assessment Areas	Geographic Distribution of Loans
St. Louis	Excellent
Southeast Missouri	Reasonable
OVERALL	EXCELLENT

Limited-Scope Assessment Area	Geographic Distribution of Loans
Cape Girardeau County	Below

As previously noted under the *Scope of Examination* section, performance in the St. Louis assessment area received primary consideration when making overall performance conclusions, considering the predominance of branches and loan activity in that assessment area. Therefore, the bank’s overall geographic distribution of loans is excellent, as driven by excellent performance in the St. Louis assessment area.

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period.

COMMUNITY DEVELOPMENT TEST

The bank’s Community Development Test rating is outstanding, primarily driven by performance in the St. Louis assessment area. Overall, the bank demonstrates excellent responsiveness to the community development needs of the assessment areas, considering the bank’s capacity and the demand/availability of such opportunities. The bank has addressed the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

Full-Scope Assessment Areas	Community Development Test Performance Conclusions
St. Louis	Excellent
Southeast Missouri	Adequate
OVERALL	EXCELLENT

Limited-Scope Assessment Area	Community Development Test Performance Conclusions
Cape Girardeau County	Below

During the review period, the bank made 43 community development loans in its assessment areas totaling \$106.1 million. The bank also made community development investments and donations in its assessment areas totaling \$1.8 million, of which \$172,750 was in donations to community development organizations. Furthermore, 39 bank employees used financial and technical banking expertise to provide 109 service activities to 36 different community development organizations within the bank’s assessment areas.

In addition to meeting the community development needs of its assessment areas, the bank had two community development loans totaling \$13.6 million outside its assessment areas but still within the broader statewide Missouri area. One loan for \$9.3 million financed construction of a hotel in a moderate-income area, and one \$4.3 million loan was for the construction of rental housing in a distressed, middle-income area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

ST. LOUIS, MISSOURI-ILLINOIS METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PARTIAL ST. LOUIS MSA ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates seven branches in this assessment area, which reflects 58.3 percent of the bank's total branches.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	2	2	3	0

During this review period, the bank did not open or close any branches in this assessment area.

General Demographics

The St. Louis assessment area consists of four Missouri counties (St. Louis City, St. Louis, St. Charles, and Jefferson) in the St. Louis, Missouri-Illinois MSA (St. Louis MSA); the entire MSA includes 15 counties (seven in Missouri and eight in Illinois) and a population of 2,820,253. The assessment area population is 1,937,704, and St. Louis County, with a population of 1,004,125, is the largest county in the assessment area (51.8 percent of the assessment area population). St. Charles County is a distant second with a population of 405,262.

The assessment area includes strong manufacturing and commercial industries and is anchored by multiple large corporations with headquarters in the area. The assessment area is also home to numerous universities and colleges. Furthermore, the banking industry in the assessment area is highly competitive, with 71 FDIC-insured depository institutions operating 514 branches throughout the assessment area. Of these institutions, the bank ranks 35th by percentage of deposit market share. Deposits held in branches in the assessment area represent 31.0 percent of total bank deposits.

The assessment area credit needs include a blend of consumer and commercial loan products. Additionally, a community contact familiar with the St. Louis region pointed to a need for innovative/flexible small business loan underwriting frameworks to help small business startups access capital options.

Income and Wealth Demographics

The following table reflects the number of assessment area census tracts by income level and the family population within those geographies.

Assessment Area Demographics by Geography Income Level				
Income Level	Census Tracts		Family Population	
Low	54	11.4%	33,444	6.8%
Moderate	93	19.6%	83,594	17.0%
Middle	162	34.2%	180,531	36.7%
Upper	159	33.5%	192,495	39.2%
Unknown	6	1.3%	1,461	0.3%
TOTAL	474	100%	491,525	100%

As shown in the table above, 31.0 percent of census tracts in the assessment area are designated as LMI, while 23.8 percent of assessment area families reside within those geographies. The substantial majority of LMI census tracts are in the northeastern quadrant of the assessment area, particularly in the northern sections of St. Louis County and St. Louis City.

Based on 2020 ACS data, the median family income for the assessment area was \$86,580. At the same time, the median family income for the St. Louis MSA was \$84,758. More recently, the FFIEC estimates the 2024 median family income for the St. Louis MSA to be \$103,200. The following table displays population percentages of assessment area families by income level compared to the St. Louis MSA.

Family Population by Income Level				
Income Category	Assessment Area		St. Louis MSA	
Low	96,712	19.7%	150,414	20.8%
Moderate	86,138	17.5%	129,743	17.9%
Middle	101,461	20.6%	152,753	21.1%
Upper	207,214	42.2%	291,483	40.2%
TOTAL	491,525	100%	724,393	100%

When compared with the data in the first table in this section, a significantly higher percentage of families in the assessment area are LMI (37.2 percent) than reside in LMI census tracts (23.8 percent). Overall, the distribution of families by income level in the assessment area is closely aligned with the St. Louis MSA. However, considering the higher percentage of upper-income families, along with the higher median family income figure, the assessment area appears to be more affluent than the St. Louis MSA as a whole. Furthermore, the percentage of assessment area families below the poverty level (6.9 percent) is also lower than the same figure for the St. Louis MSA (7.3 percent).

Housing Demographics

The following table displays housing demographics for the assessment area as compared to the St. Louis MSA.

Housing Cost Burden Levels						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	76.9%	27.9%	40.8%	63.7%	28.8%	16.8%
St. Louis MSA	75.2%	25.8%	40.8%	61.0%	26.9%	16.4%

Based on income levels, rental costs, and home values, housing in the assessment area appears slightly less affordable compared to the entire MSA, particularly for the LMI population. While both areas have the exact same percentage of all renters that are cost burdened, the figures are slightly higher in the assessment area for the low-income and moderate-income categories. These differences are likely driven by a higher median gross monthly rent figure, which is \$943 for the assessment area and \$913 for the St. Louis MSA.

Additionally, both areas have very similar percentages of all homeowners that are cost burdened, but the figures diverge more when broken out by low-income and moderate-income categories, with more owners in the assessment area that are cost burdened compared to the entire MSA. These differences are likely due to the higher median housing value in the assessment area (\$198,271) compared to the St. Louis MSA figure (\$179,231).

Industry and Employment Demographics

The assessment area supports a large and diverse business community. Furthermore, according to the BLS, there are 1,038,329 employees in the assessment area (including 107,229 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are healthcare and social assistance (19.7 percent), followed by retail trade (10.2 percent) and accommodation and food services (9.9 percent). The following table details BLS unemployment data (not seasonally adjusted) for the assessment area and the St. Louis MSA.

Unemployment Levels			
Area	Time Period (Annual Average)		
	2023	2024	YTD 2025 (Jan.–May)
Assessment Area	3.0%	3.5%	4.1%
St. Louis MSA	3.3%	3.7%	4.0%

Both areas experienced significant upticks in unemployment levels since 2023. However, the increase was more pronounced in the assessment area, where the rise in unemployment outpaced and surpassed the St. Louis MSA figure, as of the most recently available data in May 2025.

Community Contact Information

Information from one community contact was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. This interview was with an individual specializing in economic development throughout the entire St. Louis region, who stated that the area is very broad and diverse and supported by a strong business community; however, the regional population/economy is declining overall. Furthermore, the contact stated that economic conditions varied starkly based on geographic sections. The city of St. Louis continues to experience economic and population decline, while the broader St. Louis County area is strong and stable. Further west, St. Charles County is experiencing rapid growth. The contact noted the economy overall is broad based, highlighting strength coming from numerous core industries such as healthcare, aerospace, transportation/logistics, and national defense.

As previously stated, the community contact noted that population trends and economic growth vary within the assessment area, with St. Louis City experiencing negative population and economic growth while areas surrounding the city core, such as St. Charles County, have benefitted from population growth and more stable economic conditions. This sentiment is supported by demographic data for the assessment area, which shows that the population of St. Louis City declined by 5.1 percent between 2015 and 2020, while the population of St. Charles County grew by 8.1 percent in the same time frame. The contact stated that the area's negative public image is a barrier to attracting residents, which in turn negatively impacts workforce development and the ability to attract new businesses.

While drawing new industry to the region poses challenges, the contact noted that St. Louis is very startup friendly, particularly as related to high-focus areas like fintech and bioscience. Similarly, the contact stated that the competitive banking environment supports business development throughout the St. Louis region, including a significant network of investment firms and other supporting organizations to stand up new businesses. Despite this generally supportive framework, providing entrepreneurs with access to capital can be challenging. The contact noted that economic- and credit-related needs in the area stem from small business financing innovation, improving the St. Louis workforce public image, and high-level leadership (public and private) to attract and retain a resilient workforce.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PARTIAL ST. LOUIS MSA ASSESSMENT AREA

LENDING TEST

The distribution of loans reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Additionally, the geographic distribution of loans reflects excellent penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from both loan categories reviewed. The bank's HMDA loan distribution by borrower's profile, which carried more weight in determining overall performance, is excellent, while performance under the small loan business category is poor.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$103,200 for the St. Louis MSA as of 2024). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2024 HMDA aggregate lending data for the assessment area is displayed. Based on that information, the bank's percentage of lending to low-income borrowers (27.3 percent) is substantially above the low-income family population figure (19.7 percent) and the HMDA aggregate lending level to low-income borrowers (8.5 percent), reflecting excellent performance. Similarly, the bank's level of lending to moderate-income borrowers (28.1 percent) is well above the moderate-income family population percentage (17.5 percent) and the aggregate lending level (18.7 percent), reflecting excellent performance. Therefore, the bank's overall distribution of HMDA loans by borrower's profile is excellent, as supported by the information in the following table.

Borrower Distribution of HMDA Loans							
Borrower Income Levels	Bank Loans		Aggregate Data	Bank Loans (000s)		Aggregate Data	Families by Income Level %
Home Purchase							
Low	33	37.5%	8.9%	\$4,172	22.9%	4.0%	19.7%
Moderate	30	34.1%	20.0%	\$5,604	30.8%	13.6%	17.5%
Middle	4	4.5%	17.8%	\$893	4.9%	16.2%	20.6%
Upper	11	12.5%	29.2%	\$5,207	28.6%	42.4%	42.2%
Unknown	10	11.4%	24.1%	\$2,305	12.7%	23.8%	0.0%
TOTAL	88	100.0%	100.0%	\$18,181	100.0%	100.0%	100.0%
Refinance							
Low	3	11.5%	8.4%	\$177	3.7%	4.0%	19.7%
Moderate	6	23.1%	16.7%	\$610	12.9%	11.5%	17.5%
Middle	4	15.4%	17.8%	\$714	15.1%	15.0%	20.6%
Upper	7	26.9%	30.1%	\$1,155	24.4%	39.6%	42.2%
Unknown	6	23.1%	27.1%	\$2,086	44.0%	30.0%	0.0%
TOTAL	26	100.0%	100.0%	\$4,742	100.0%	100.0%	100.0%
Home Improvement							
Low	2	11.1%	6.5%	\$440	1.9%	3.4%	19.7%
Moderate	3	16.7%	15.8%	\$125	6.1%	9.9%	17.5%
Middle	4	22.2%	22.8%	\$210	10.2%	17.4%	20.6%
Upper	8	44.4%	49.3%	\$1,514	73.5%	61.3%	42.2%
Unknown	1	5.6%	5.6%	\$170	8.3%	8.0%	0.0%
TOTAL	18	100.0%	100.0%	\$2,059	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.4%	\$0	0.0%	0.1%	N/A
Upper	0	0.0%	2.7%	\$0	0.0%	0.3%	N/A
Unknown	7	100.0%	96.9%	\$5,486	100.0%	99.6%	N/A
TOTAL	7	100.0%	100.0%	\$5,486	100.0%	100.0%	N/A
Total Home Mortgage Loans							
Low	38	27.3%	8.5%	\$4,389	14.4%	3.7%	19.7%
Moderate	39	28.1%	18.7%	\$6,339	20.8%	12.1%	17.5%
Middle	12	8.6%	18.1%	\$1,817	6.0%	14.9%	20.6%
Upper	26	18.7%	30.9%	\$7,876	25.9%	39.5%	42.2%
Unknown	24	17.3%	23.9%	\$10,047	33.0%	29.8%	0.0%
TOTAL	139	100.0%	100.0%	\$30,468	100.0%	100.0%	100.0%

Next, small business loans were reviewed to determine the bank’s lending levels to businesses of different sizes. The following table shows the distribution of small business loans by loan amount and business revenue size compared to Dun & Bradstreet demographics and CRA aggregate lending data.

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank	Aggregate	Bank (000s)	Aggregate			
Business Revenue	\$1 Million or Less	9	21.4%	54.4%	\$1,979	23.4%	30.0%	90.6%
	Over \$1 Million/ Unknown	33	78.6%	45.6%	\$6,494	76.6%	70.0%	9.4%
	TOTAL	42	100.0%	100.0%	\$8,473	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	18	42.9%	92.5%	\$846	10.0%	32.3%	
	\$100,001– \$250,000	12	28.6%	3.6%	\$1,998	23.6%	15.6%	
	\$250,001– \$1 Million	12	28.6%	3.8%	\$5,629	66.4%	52.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	42	100.0%	100.0%	\$8,473	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	4	44.4%		\$187	9.4%		
	\$100,001– \$250,000	2	22.2%		\$288	14.6%		
	\$250,001– \$1 Million	3	33.3%		\$1,504	76.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	9	100.0%		\$1,979	100.0%		

The bank’s level of lending to small businesses is poor. The bank originated 21.4 percent of the small business loans reviewed to businesses with revenues of \$1 million or less, which is well below data used for comparison. Assessment area demographics estimate that 90.6 percent of businesses in the assessment area had annual revenues of \$1 million or less, and the 2024 aggregate lending level to small businesses is 54.4 percent.

Geographic Distribution of Loans

As noted previously, the assessment area includes 54 low-income and 93 moderate-income census tracts, representing 31.0 percent of all assessment area census tracts. Overall, the bank’s geographic distribution of loans in this assessment area reflects excellent penetration throughout these LMI census tracts, driven by excellent performance in the HMDA loan category. Furthermore, based on reviews from both loan categories, the bank had loan activity in 27.0 percent of all assessment area census tracts, and there were no conspicuous lending gaps noted in LMI areas.

The table on the following page displays the geographic distribution of HMDA loans compared to owner-occupied housing demographics and HMDA aggregate lending performance in the assessment area. Based on that information, the analysis of HMDA loans revealed excellent lending to borrowers residing in low-income geographies (10.1 percent), which is well above the

percentage of owner-occupied housing units in low-income census tracts (4.5 percent) and the HMDA aggregate lending level in low-income census tracts (4.4 percent). Similarly, the bank made an excellent level of HMDA loans in moderate-income census tracts (25.9 percent), which is well above the demographic figure used for comparison (15.0 percent) and the HMDA aggregate lending level in moderate-income census tracts (16.0 percent). Therefore, the bank's overall geographic distribution of HMDA loans is excellent, as supported by the information in the following table.

Geographic Distribution of HMDA Loans							
Geography Income Levels	Bank Loans		Aggregate Data	Bank Loans (000s)		Aggregate Data	% Owner-Occupied Units
Home Purchase							
Low	14	15.9%	4.8%	\$2,244	12.3%	2.3%	4.5%
Moderate	24	27.3%	17.3%	\$3,421	18.8%	10.1%	15.0%
Middle	33	37.5%	39.9%	\$6,607	36.3%	35.4%	38.3%
Upper	17	19.3%	37.7%	\$5,909	32.5%	51.9%	42.1%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.2%
TOTAL	88	100.0%	100.0%	\$18,181	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	3.9%	\$0	0.0%	1.9%	4.5%
Moderate	4	15.4%	14.1%	\$523	11.0%	8.7%	15.0%
Middle	9	34.6%	40.0%	\$1,379	29.1%	35.5%	38.3%
Upper	13	50.0%	41.7%	\$2,840	59.9%	53.6%	42.1%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.2%
TOTAL	26	100.0%	100.0%	\$4,742	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	2.0%	\$0	0.0%	1.4%	4.5%
Moderate	4	22.2%	10.3%	\$225	10.9%	7.0%	15.0%
Middle	5	27.8%	36.7%	\$415	20.2%	29.3%	38.3%
Upper	9	50.0%	50.7%	\$1,419	68.9%	62.1%	42.1%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.2%
TOTAL	18	100.0%	100.0%	\$2,059	100.0%	100.0%	100.0%
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	13.1%	\$0	0.0%	6.4%	10.2%
Moderate	4	57.1%	22.0%	\$3,478	63.4%	19.1%	17.8%
Middle	2	28.6%	37.1%	\$1,433	26.1%	37.1%	39.4%
Upper	1	14.3%	25.5%	\$575	10.5%	36.3%	30.5%
Unknown	0	0.0%	2.3%	\$0	0.0%	1.1%	2.0%
TOTAL	7	100.0%	100.0%	\$5,486	100.0%	100.0%	100.0%
Total Home Mortgage Loans							% Owner-Occupied Units
Low	14	10.1%	4.4%	\$2,244	7.4%	2.5%	4.5%
Moderate	36	25.9%	16.0%	\$7,647	25.1%	10.3%	15.0%
Middle	49	35.3%	39.7%	\$9,834	32.3%	35.4%	38.3%
Upper	40	28.8%	39.7%	\$10,743	35.3%	51.5%	42.1%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.3%	0.2%
TOTAL	139	100.0%	100.0%	\$30,468	100.0%	100.0%	100.0%

Second, the bank’s geographic distribution of small business loans was reviewed. The following table displays small business loan activity by geography income level compared to the location of businesses throughout the bank’s assessment area and small business CRA aggregate lending data.

Geographic Distribution of Small Business Loans							
Tract Income Levels	Count			Dollars			Businesses
	Bank	Aggregate	Aggregate	Bank \$ (000s)	Aggregate		
Low	1	2.4%	5.1%	\$600	7.1%	6.9%	7.2%
Moderate	4	9.5%	11.9%	\$330	3.9%	11.1%	14.9%
Middle	18	42.9%	33.5%	\$3,855	45.5%	31.5%	34.6%
Upper	19	45.2%	48.4%	\$3,688	43.5%	48.6%	42.2%
Unknown	0	0.0%	1.1%	\$0	0.0%	1.9%	1.1%
TOTAL	42	100.0%	100.0%	\$8,473	100.0%	100.0%	100.0%

The overall geographic distribution of loans is reasonably close to comparison data. By number of small business loans in low-income census tracts, bank performance (2.4 percent) is in line with the CRA aggregate lending level (5.1 percent) but below the demographic estimate of businesses in low-income census tracts (7.2 percent). By dollar amount of lending in low-income census tracts, however, the bank’s performance (7.1 percent) is much more closely aligned with the demographic estimate (7.2 percent) and the CRA aggregate lending level (6.9 percent). Consequently, bank performance in low-income census tracts is reasonable. Conversely, by dollar amount of small business loans in moderate-income census tracts (3.9 percent), the bank’s level of lending is below the demographic estimate of businesses in moderate-income census tracts (14.9 percent) and the CRA aggregate lending level (11.1 percent). However, by number of small business loans, bank performance in moderate-income census tracts (9.5 percent) is similar to the demographic estimate (14.9 percent) and the aggregate lending level (11.9 percent). Therefore, the bank’s overall geographic distribution of small business loans is reasonable.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates excellent responsiveness to community development needs within the St. Louis assessment area, considering the bank’s capacity and the demand/availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank made 31 community development loans in this assessment area totaling \$68.0 million. The majority of these loans were to organizations and small businesses supporting economic development in the assessment area, totaling \$43.6 million. Also noteworthy, four loans totaling \$13.5 million were particularly impactful, as they supported revitalization and stabilization efforts in LMI areas; such commercial real estate development loans were often in areas designated as community improvement districts.

The bank also made community development investments and donations in this assessment area totaling \$1.8 million. This amount included three prior-period investments totaling \$1.7 million, which remain in the bank’s investment portfolio and supported affordable housing and

revitalization and stabilization efforts in LMI areas. Furthermore, the bank made 64 community development donations totaling \$148,700; some of the most impactful donations supported personal and small business financial literacy education in the St. Louis assessment area.

Lastly, during the review period, 21 bank employees used financial expertise and business knowledge to provide 59 services to 15 separate community development organizations within the assessment area. Service activities most often entailed providing financial education to LMI individuals and advising community development organizations via membership on a committee or board of directors.

MISSOURI NONMETROPOLITAN STATEWIDE AREA
(Full-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SOUTHEAST MISSOURI ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates two branches in this assessment area, which reflects 16.7 percent of the bank’s total branches.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
1	0	1	0	0

During this review period, the bank did not open or close any branches in this assessment area. Both of the bank’s branches are located in Sikeston, Missouri, which is in Scott County. Furthermore, Scott County abuts Cape Girardeau County to the north and benefits from the bank’s branch network services in that market. Consequently, based on these branch network characteristics, the bank has primary service accessibility in Scott County and diminished accessibility in New Madrid County, which makes up the southern part of the assessment area.

General Demographics

The Southeast Missouri assessment area consists of two counties, New Madrid County and Scott County, which are located in the far southeastern portion of Missouri bordering the Mississippi River to the east and the Cape Girardeau, Missouri-Illinois MSA to the north. The largest city in the assessment area is the city of Sikeston, which is partially in both counties (but primarily located within Scott County). The assessment area population is 54,493, and of the two counties, Scott County has a significantly larger population (38,059) compared to New Madrid County (16,434).

There are 12 FDIC-insured depository institutions operating 24 branches throughout the assessment area, and of these institutions, the bank ranks first by percentage of deposit market share. Bank deposits held at the two branches in this assessment area represent 37.3 percent of total bank deposits.

The combined area credit needs include a blend of consumer and commercial loan products. Additionally, a community contact in the assessment area highlighted that older housing stock equates to a need for a first-time homebuyer program that supports rehabbing homes. Other significant credit-related needs in the area include outreach and partnerships in efforts to provide financial literacy training.

Income and Wealth Demographics

The following table reflects the number of assessment area census tracts by income level and the family population within those geographies.

Assessment Area Demographics by Geography Income Level				
Income Level	Census Tracts		Family Population	
Low	1	5.9%	455	3.1%
Moderate	2	11.8%	1,479	10.0%
Middle	12	70.6%	10,777	72.9%
Upper	2	11.8%	2,077	14.0%
Unknown	0	0.0%	0	0.0%
TOTAL	17	100%	14,788	100%

As shown in the table above, 17.7 percent of census tracts in the assessment area are designated as LMI, while 13.1 percent of assessment area families reside within those geographies. While the only low-income census tract is in the city of Sikeston, which is centrally located in the assessment area, the two moderate-income census tracts are in the extreme southwest portion of the assessment area in New Madrid County.

Based on 2020 ACS data, the median family income for the assessment area was \$55,874. At the same time, the median family income for nonMSA Missouri was \$56,957. More recently, the FFIEC estimates the 2024 median family income for nonMSA Missouri to be \$70,600. The following table displays population percentages of assessment area families by income level compared to nonMSA Missouri.

Family Population by Income Level				
Income Category	Assessment Area		NonMSA Missouri	
Low	3,774	25.5%	79,356	20.2%
Moderate	2,351	15.9%	71,657	18.2%
Middle	2,728	18.4%	82,407	20.9%
Upper	5,935	40.1%	159,994	40.7%
TOTAL	14,788	100%	393,414	100%

When compared with the data in the first table in this section, a significantly higher percentage of families in the assessment area are LMI (41.4 percent) than reside in LMI census tracts (13.1 percent). Overall, the distribution of families by income level in the assessment area reveals smaller percentages of moderate- and middle-income families and a higher percentage of low-income families in the assessment area compared to the nonMSA portions of the state. Similarly, the assessment area has a higher percentage of families below the poverty level (15.6 percent) compared to nonMSA Missouri (12.1 percent). In light of these characteristics, it appears that assessment area income levels and overall affluence are generally below that of nonMSA Missouri overall.

Housing Demographics

The following table displays housing demographics for the assessment area as compared to the entire nonMSA portion of Missouri.

Housing Cost Burden Levels						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	64.7%	35.9%	36.3%	52.4%	24.0%	13.2%
NonMSA Missouri	65.6%	30.7%	35.2%	54.7%	25.5%	16.3%

Based on income levels, rental costs, and home values, housing costs negatively impact renters more than homeowners. As displayed in the previous table, all renters in the assessment are similarly cost burdened compared to nonMSA Missouri; however, in the assessment area, those renters in the moderate-income category are more likely to be significantly cost burdened compared to counterparts in nonMSA Missouri overall. Likewise, the median gross monthly rent figure in the assessment area is \$708, which is higher than the nonMSA Missouri figure of \$668.

Conversely, homeowners in the assessment area are less likely to be cost burdened compared to those in the nonMSA portions of Missouri; such findings were true for LMI homeowners as well as all homeowners, despite a lower median family income figure for the assessment area. Consequently, the lower cost burden percentages in the assessment area likely stem from lower overall costs of owning a home, as evidenced by the assessment area median housing value (\$103,235), which is lower than the nonMSA Missouri figure (\$119,721). While homes in the assessment area appear more affordable based on median value, as pointed out by a community contact, much of the affordable housing stock needs repair. Along those lines, the median age of assessment area housing stock is 50 years, which is significantly above the nonMSA Missouri figure of 37 years. Therefore, significant housing costs may yet be needed to rehabilitate lower-priced housing in the assessment area.

Industry and Employment Demographics

According to the BLS, there are 23,862 employees in the assessment area (including 3,333 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are manufacturing (16.1 percent), followed by retail trade (12.4 percent) and transportation and warehousing (9.3 percent). The following table details BLS unemployment data (not seasonally adjusted) for the assessment area and nonMSA Missouri.

Unemployment Levels			
Area	Time Period (Annual Average)		
	2023	2024	YTD 2025 (Jan.–May)
Assessment Area	3.4%	4.3%	4.4%
NonMSA Missouri	3.5%	4.2%	4.7%

Both areas saw increases in unemployment levels going back through 2023. However, the increase was slightly less in the assessment area compared to nonMSA Missouri overall.

Community Contact Information

Information from one community contact was used to help shape the performance context in which the bank’s activities in this assessment area were evaluated. This interview was with an individual specializing in workforce development in Southeast Missouri, who stated that economically, the region has stabilized in the past five years after recovering from significant 2020 pandemic-related challenges. However, some counties offer limited employment opportunities beyond agriculture and mining, while other counties benefit from more diversified economies that offer opportunities in healthcare and transportation/logistics.

Housing, specifically affordable housing, is a critical need in the region. Much of the affordable housing stock is older and in need of repair, and a program assisting first-time homebuyers to purchase/renovate older houses would address this need. The contact also noted that a significant portion of the community would benefit from financial literacy training, including credit-building education. For example, one particularly successful local program combined employment education with finance basics, such as setting up and managing bank accounts. Furthermore, while general banking services are readily accessible in the area, banks have opportunities to increase visibility by partnering with community development organizations, particularly as related to financial education for consumers and entrepreneurs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHEAST MISSOURI ASSESSMENT AREA

LENDING TEST

The distribution of loans reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Likewise, the geographic distribution of loans reflects reasonable penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from both loan categories reviewed. While the bank's HMDA loan distribution by borrower's profile is reasonable and performance under the small business loan category is excellent, performance in the HMDA loan category carried more weight when making overall conclusions, considering the higher volume of home mortgage lending in this assessment area.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$70,600 for nonMSA Missouri as of 2024). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2024 HMDA aggregate lending data for the assessment area is displayed. Based on that data, the bank's percentage of lending to low-income borrowers (10.0 percent) is below the low-income family population figure (25.5 percent) but above the HMDA aggregate lending level to low-income borrowers (7.0 percent), reflecting reasonable performance. Furthermore, the bank's level of lending to moderate-income borrowers (18.0 percent) is also reasonable as compared to the moderate-income family population percentage (15.9 percent) and the HMDA aggregate lending level to moderate-income borrowers (18.9 percent). Therefore, the bank's overall distribution of HMDA loans by borrower's profile is reasonable, as supported by the information in the following table.

Borrower Distribution of HMDA Loans							
Borrower Income Levels	Bank Loans		Aggregate Data	Bank Loans (000s)		Aggregate Data	Families by Income Level %
Home Purchase							
Low	4	36.4%	6.7%	\$255	17.1%	3.8%	25.5%
Moderate	0	0.0%	19.4%	\$0	0.0%	15.6%	15.9%
Middle	4	36.4%	18.5%	\$354	23.8%	18.2%	18.4%
Upper	3	27.3%	23.6%	\$880	59.1%	31.5%	40.1%
Unknown	0	0.0%	31.7%	\$0	0.0%	30.9%	0.0%
TOTAL	11	100.0%	100.0%	\$1,489	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	8.6%	\$0	0.0%	4.1%	25.5%
Moderate	3	18.8%	19.3%	\$170	8.8%	13.3%	15.9%
Middle	2	12.5%	17.3%	\$78	4.0%	16.0%	18.4%
Upper	8	50.0%	29.4%	\$1,264	65.2%	35.8%	40.1%
Unknown	3	18.8%	25.4%	\$427	22.0%	30.7%	0.0%
TOTAL	16	100.0%	100.0%	\$1,939	100.0%	100.0%	100.0%
Home Improvement							
Low	1	4.5%	6.6%	\$50	3.4%	3.5%	25.5%
Moderate	6	27.3%	17.1%	\$221	15.1%	7.3%	15.9%
Middle	4	18.2%	13.2%	\$105	7.2%	8.1%	18.4%
Upper	9	40.9%	56.6%	\$747	51.2%	68.1%	40.1%
Unknown	2	9.1%	6.6%	\$337	23.1%	12.9%	0.0%
TOTAL	22	100.0%	100.0%	\$1,460	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Unknown	1	100.0%	100.0%	\$2,800	100.0%	100.0%	N/A
TOTAL	1	100.0%	100.0%	\$2,800	100.0%	100.0%	N/A
Total Home Mortgage Loans							
Low	5	10.0%	7.0%	\$305	4.0%	3.7%	25.5%
Moderate	9	18.0%	18.9%	\$391	5.1%	14.2%	15.9%
Middle	10	20.0%	17.5%	\$537	7.0%	16.6%	18.4%
Upper	20	40.0%	26.9%	\$2,891	37.6%	31.9%	40.1%
Unknown	6	12.0%	29.8%	\$3,564	46.4%	33.6%	0.0%
TOTAL	50	100.0%	100.0%	\$7,688	100.0%	100.0%	100.0%

Next, small business loans were reviewed to determine the bank’s lending levels to businesses of different sizes. The following table shows the distribution of small business loans by loan amount and business revenue size compared to Dun & Bradstreet demographics and CRA aggregate lending data.

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank	Aggregate	Bank (000s)	Aggregate			
Business Revenue	\$1 Million or Less	10	83.3%	60.5%	\$2,087	89.7%	36.1%	88.2%
	Over \$1 Million/ Unknown	2	16.7%	39.5%	\$240	10.3%	63.9%	11.8%
	TOTAL	12	100.0%	100.0%	\$2,327	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	6	50.0%	89.4%	\$239	10.3%	30.3%	
	\$100,001– \$250,000	4	33.3%	6.6%	\$661	28.4%	22.6%	
	\$250,001– \$1 Million	2	16.7%	4.0%	\$1,427	61.3%	47.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	12	100.0%	100.0%	\$2,327	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	5	50.0%		\$209	10.0%		
	\$100,001– \$250,000	3	30.0%		\$451	21.6%		
	\$250,001– \$1 Million	2	20.0%		\$1,427	68.4%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	10	100.0%		\$2,087	100.0%		

The bank’s level of lending to small businesses is excellent. The bank originated the substantial majority of its small business loans (83.3 percent) to businesses with revenues of \$1 million or less. In comparison, assessment area demographics estimate that 88.2 percent of businesses in the assessment area had annual revenues of \$1 million or less, and the 2024 aggregate lending level to small businesses is 60.5 percent.

Geographic Distribution of Loans

As noted previously, the assessment area includes one low-income and two moderate-income census tracts, representing 17.7 percent of all assessment area census tracts. Overall, based on both loan products reviewed, the bank’s geographic distribution of loans is reasonable considering performance context, such as branch locations and service accessibility to LMI geographies. Furthermore, the bank had loan activity in 82.4 percent of all assessment area census tracts, and there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank’s overall geographic distribution of loans is reasonable.

The table on the following page displays the geographic distribution of HMDA loans compared to owner-occupied housing demographics and HMDA aggregate lending performance in the assessment area. Based on that information, the analysis of HMDA loans revealed reasonable lending to borrowers residing in low-income geographies (4.0 percent), which is above the

percentage of owner-occupied housing units in low-income census tracts (2.4 percent) and the HMDA aggregate lending level in low-income census tracts (3.4 percent). Conversely, the bank did not have any HMDA loans in moderate-income census tracts, even though 8.3 percent of owner-occupied housing is in those geographies and aggregate HMDA lenders made 5.4 percent of loans in those census tracts. However, the only two moderate-income geographies in this assessment area are in the furthest southwest portion of the assessment area, making service accessibility a challenge for the bank, given its branch offices are located in the middle of the assessment area. Furthermore, the substantial majority of the bank's HMDA loans (74.0 percent) were in middle-income geographies, which closely aligns with the owner-occupied housing percentage in middle-income geographies (73.5 percent) and the HMDA aggregate lending level in middle-income census tracts (76.1 percent). Considering branch locations and service accessibility in LMI areas, the bank's overall geographic distribution of HMDA loans is reasonable.

Geographic Distribution of HMDA Loans							
Geography Income Levels	Bank Loans		Aggregate Data	Bank Loans (000s)		Aggregate Data	% Owner- Occupied Units
Home Purchase							
Low	1	9.1%	2.7%	\$70	4.7%	1.6%	2.4%
Moderate	0	0.0%	5.7%	\$0	0.0%	3.8%	8.3%
Middle	9	81.8%	76.6%	\$1,349	90.6%	75.1%	73.5%
Upper	1	9.1%	15.0%	\$70	4.7%	19.4%	15.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	11	100.0%	100.0%	\$1,489	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	4.6%	\$0	0.0%	2.3%	2.4%
Moderate	0	0.0%	5.1%	\$0	0.0%	4.3%	8.3%
Middle	11	68.8%	75.1%	\$1,507	77.7%	77.9%	73.5%
Upper	5	31.3%	15.2%	\$432	22.3%	15.5%	15.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	16	100.0%	100.0%	\$1,939	100.0%	100.0%	100.0%
Home Improvement							
Low	1	4.5%	5.3%	\$50	3.4%	3.9%	2.4%
Moderate	0	0.0%	3.9%	\$0	0.0%	2.1%	8.3%
Middle	16	72.7%	73.7%	\$1,235	84.6%	79.8%	73.5%
Upper	5	22.7%	17.1%	\$175	12.0%	14.1%	15.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	22	100.0%	100.0%	\$1,460	100.0%	100.0%	100.0%
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	16.7%	\$0	0.0%	11.7%	12.4%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	2.6%
Middle	1	100.0%	75.0%	\$2,800	100.0%	86.6%	73.9%
Upper	0	0.0%	8.3%	\$0	0.0%	1.8%	11.1%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	1	100.0%	100.0%	\$2,800	100.0%	100.0%	100.0%
Total Home Mortgage Loans							% Owner- Occupied Units
Low	2	4.0%	3.4%	\$120	1.6%	2.3%	2.4%
Moderate	0	0.0%	5.4%	\$0	0.0%	3.6%	8.3%
Middle	37	74.0%	76.1%	\$6,891	89.6%	76.3%	73.5%
Upper	11	22.0%	15.1%	\$677	8.8%	17.7%	15.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	50	100.0%	100.0%	\$7,688	100.0%	100.0%	100.0%

Second, the bank’s geographic distribution of small business loans was reviewed. The following table displays small business loan activity by geography income level compared to the location of businesses throughout the bank’s assessment area and small business CRA aggregate lending data.

Geographic Distribution of Small Business Loans							
Tract Income Levels	Count			Dollars			Businesses
	Bank	Aggregate	Aggregate	Bank (000s)	Aggregate	Aggregate	
Low	0	0.0%	5.3%	\$0	0.0%	5.0%	6.8%
Moderate	0	0.0%	5.9%	\$0	0.0%	2.9%	8.0%
Middle	11	91.7%	68.6%	\$2,232	96.0%	80.6%	66.2%
Upper	1	8.3%	19.3%	\$94	4.0%	11.0%	19.0%
Unknown	0	0.0%	0.9%	\$0	0.0%	0.5%	0.0%
TOTAL	12	100.0%	100.0%	\$2,326	100.0%	100.0%	100.0%

While none of the bank’s small businesses loans included in the analysis were made to a business located in an LMI geography in the assessment area, this performance is considered reasonable when considering geographic constraints and the limited opportunities available for small business lending in these geographies. Opportunities for small business lending in these geographies are likely limited, as evidenced by the relatively small percentage of businesses that are located in LMI geographies (6.8 percent of assessment area businesses in low-income census tracts and 8.0 percent in moderate-income tracts) and the low percentages of reported CRA loan activity in these census tracts (5.0 percent of aggregate loans in low-income tracts and only 2.9 percent in moderate-income tracts). Moreover, the assessment area includes only two moderate-income census tracts, which are located a substantial distance from the bank’s branches in the far southwestern section of the assessment area. The vast majority of the bank’s small business loans were made in middle-income geographies where 66.2 percent of businesses in the assessment area are located. Given this context, the geographic distribution of small business loans is considered reasonable.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates adequate responsiveness to community development needs within the Southeast Missouri assessment area, considering the bank’s capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank made seven community development loans in this assessment area totaling \$27.9 million. In addition, the bank made \$9,000 in community development donations, and eight employees provided services to 12 community development organizations in the assessment area.

CAPE GIRARDEAU, MISSOURI-ILLINOIS METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CAPE GIRARDEAU COUNTY ASSESSMENT AREA

This assessment area includes one county, Cape Girardeau County, Missouri, which is one of the three counties that comprise the entire Cape Girardeau, Missouri-Illinois MSA. The bank operates three branches in this assessment area; no branches were opened or closed during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	3,161	3,532	4,187	7,837	18,717
	16.9%	18.9%	22.4%	41.9%	100%
Household Population	6,771	4,827	5,322	13,295	30,215
	22.4%	16.0%	17.6%	44.0%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	3	12	4	0	19
	0.0%	15.8%	63.2%	21.1%	0.0%	100%
Family Population	0	1,482	11,170	6,065	0	18,717
	0.0%	7.9%	59.7%	32.4%	0.0%	100%
Household Population	0	3,446	17,836	8,933	0	30,215
	0.0%	11.4%	59.0%	29.6%	0.0%	100%
Business Institutions	0	244	1,951	1,157	0	3,352
	0.0%	7.3%	58.2%	34.5%	0.0%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CAPE GIRARDEAU COUNTY ASSESSMENT AREA

LENDING TEST

The bank’s Lending Test performance in this assessment area is below the bank’s performance in the full-scope review assessment areas, as detailed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix A*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Below
OVERALL	BELOW

COMMUNITY DEVELOPMENT TEST

The bank’s Community Development Test performance in this assessment area is below the bank’s performance in the full-scope review assessment areas.

During the review period, the bank made five community development loans totaling \$10.2 million in this assessment area. The bank also made 13 community development donations totaling \$15,050 and provided 25 services to 11 different community development organizations in this assessment area.

LENDING PERFORMANCE TABLES

Cape Girardeau County

Borrower Distribution of HMDA Loans							
Borrower Income Levels	Bank Loans		Aggregate Data	Bank Loans (000s)		Aggregate Data	Families by Income Level %
Home Purchase							
Low	1	3.2%	8.0%	\$32	0.5%	4.2%	16.9%
Moderate	2	6.5%	18.6%	\$240	3.5%	14.1%	18.9%
Middle	4	12.9%	19.2%	\$911	13.2%	19.0%	22.4%
Upper	15	48.4%	28.2%	\$4,518	65.6%	39.0%	41.9%
Unknown	9	29.0%	26.0%	\$1,183	17.2%	23.7%	0.0%
TOTAL	31	100.0%	100.0%	\$6,884	100.0%	100.0%	100.0%
Refinance							
Low	1	4.8%	7.8%	\$15	0.7%	3.2%	16.9%
Moderate	3	14.3%	12.6%	\$231	10.2%	8.7%	18.9%
Middle	6	28.6%	19.7%	\$510	22.4%	15.3%	22.4%
Upper	11	52.4%	31.8%	\$1,516	66.7%	37.9%	41.9%
Unknown	0	0.0%	28.2%	\$0	0.0%	34.9%	0.0%
TOTAL	21	100.0%	100.0%	\$2,272	100.0%	100.0%	100.0%
Home Improvement							
Low	2	10.0%	8.5%	\$95	8.5%	6.5%	16.9%
Moderate	3	15.0%	16.9%	\$41	12.6%	11.3%	18.9%
Middle	4	20.0%	26.2%	\$197	17.6%	21.1%	22.4%
Upper	9	45.0%	36.2%	\$636	56.8%	44.9%	41.9%
Unknown	2	10.0%	12.3%	\$50	4.5%	16.3%	0.0%
TOTAL	20	100.0%	100.0%	\$1,119	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Unknown	2	100.0%	100.0%	\$1,230	100.0%	100.0%	N/A
TOTAL	2	100.0%	100.0%	\$1,230	100.0%	100.0%	N/A
Total Home Mortgage Loans							
Low	4	5.4%	7.9%	\$142	1.2%	3.8%	16.9%
Moderate	8	10.8%	16.8%	\$612	5.3%	12.2%	18.9%
Middle	14	18.9%	19.5%	\$1,618	14.1%	17.3%	22.4%
Upper	35	47.3%	29.1%	\$6,670	58.0%	37.0%	41.9%
Unknown	13	17.6%	26.8%	\$2,463	21.4%	29.7%	0.0%
TOTAL	74	100.0%	100.0%	\$11,505	100.0%	100.0%	100.0%

Small Business Loans by Revenue and Loan Size								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank	Aggregate	Bank (000s)	Aggregate			
Business Revenue	\$1 Million or Less	11	55.0%	56.8%	\$1,249	35.6%	48.0%	89.4%
	Over \$1 Million/ Unknown	9	45.0%	43.2%	\$2,264	64.4%	52.0%	10.6%
	TOTAL	20	100.0%	100.0%	\$3,513	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	11	55.0%	90.2%	\$446	12.7%	33.0%	
	\$100,001– \$250,000	4	20.0%	5.0%	\$635	18.1%	16.8%	
	\$250,001– \$1 Million	5	25.0%	4.8%	\$2,432	69.2%	50.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	20	100.0%	100.0%	\$3,513	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	7	63.6%		\$270	21.6%		
	\$100,001– \$250,000	2	18.2%		\$315	25.2%		
	\$250,001– \$1 Million	2	18.2%		\$664	53.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	11	100.0%		\$1,249	100.0%		

Geographic Distribution of HMDA Loans							
Geography Income Levels	Bank Loans		Aggregate Data	Bank Loans (000s)		Aggregate Data	% Owner-Occupied Units
Home Purchase							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	3	9.7%	9.6%	\$304	4.4%	5.0%	5.9%
Middle	17	54.8%	60.5%	\$3,122	45.4%	60.0%	59.0%
Upper	11	35.5%	29.9%	\$3,458	50.2%	35.0%	35.2%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	31	100.0%	100.0%	\$6,884	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	5.3%	\$0	0.0%	3.0%	5.9%
Middle	12	57.1%	60.0%	\$1,399	61.6%	58.5%	59.0%
Upper	9	42.9%	34.7%	\$873	38.4%	38.5%	35.2%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	21	100.0%	100.0%	\$2,272	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	5.0%	4.6%	\$60	5.4%	4.3%	5.9%
Middle	14	70.0%	64.6%	\$797	71.2%	61.1%	59.0%
Upper	5	25.0%	30.8%	\$262	23.4%	34.5%	35.2%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	20	100.0%	100.0%	\$1,119	100.0%	100.0%	100.0%
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	7.4%	\$0	0.0%	10.3%	31.1%
Middle	2	100.0%	88.9%	\$1,230	100.0%	88.2%	52.9%
Upper	0	0.0%	3.7%	\$0	0.0%	1.5%	16.0%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	2	100.0%	100.0%	\$1,230	100.0%	100.0%	100.0%
Total Home Mortgage Loans							% Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	4	5.4%	8.3%	\$364	3.2%	4.8%	5.9%
Middle	45	60.8%	61.1%	\$6,548	56.9%	61.1%	59.0%
Upper	25	33.8%	30.6%	\$4,593	39.9%	34.1%	35.2%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	74	100.0%	100.0%	\$11,505	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Tract Income Levels	Count			Dollars			Businesses
	Bank		Aggregate	Bank (000s)		Aggregate	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	10.0%	6.7%	\$194	5.5%	8.2%	7.3%
Middle	10	50.0%	58.1%	\$1,527	43.5%	59.6%	58.2%
Upper	8	40.0%	34.9%	\$1,792	51.0%	32.1%	34.5%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.0%	0.0%
TOTAL	20	100.0%	100.0%	\$3,513	100.0%	100.0%	100.0%

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.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan 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 on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) 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; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a

poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders who 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., 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 refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of 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.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an 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 statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of

criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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 businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports 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 secured either 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): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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