

PUBLIC DISCLOSURE

July 13, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hendricks County Bank and Trust Company
RSSD# 633640

1 East Main Street
Brownsburg, Indiana 46112

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604

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.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Hendricks County Bank and Trust Company (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans, by number, are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Chicago (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 performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, aggregate lending data, and credit needs. Lending performance was assessed within the bank's only AA. In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units by census tract income level for home mortgage lending and the percentage of businesses by census tract income level for small business lending. 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 the percentage of families by income level for home mortgage lending and the percentage of businesses in the AA with revenues of \$1 million or less for small business lending.

Examiners reviewed the following data:

- **Loan-to-Deposit Ratio:** The bank's 16-quarter average LTD ratio from June 30, 2022, through March 31, 2026, was calculated and compared to a sample of local competitors.
- **Lending in the Assessment Area:** 93 HMDA-reportable loans originated from January 1, 2024, through December 31, 2025, and a sample of 45 small business loans originated from January 1, 2025, through December 31, 2025, were reviewed to determine the percentage of loans originated within the assessment area.

- Geographic Distribution of Lending in the Assessment Area: 54 HMDA-reportable loans originated from January 1, 2024, through December 31, 2025, and a sample of 25 small business loans originated from January 1, 2025, through December 31, 2025, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels. Small business loans received greater weight in the analysis given the bank's loan portfolio composition.
- Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes: 54 HMDA-reportable loans originated from January 1, 2024, through December 31, 2025, and a sample of 25 small business loans originated from January 1, 2025, through December 31, 2025, within the assessment area, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses of different revenue sizes. Small business loans received greater weight in the analysis given the bank's loan portfolio composition.
- Response to Substantiated Complaints: Complaints were reviewed to determine if any were related to the bank's record of helping to meet the credit needs of the community and its bank's responses to any received were evaluated for appropriateness.

DESCRIPTION OF INSTITUTION

Hendricks County Bank and Trust Company is a community bank headquartered in Brownsburg, Indiana. The bank's characteristics include the following.

- The bank is a wholly-owned subsidiary of Midstate Financial Corporation.
- The bank maintains two wholly owned subsidiaries: Freedom Mortgage Company and Green Street Corporation. Freedom Mortgage Company is a mortgage lending subsidiary that is currently inactive as the bank directly originates and services residential real estate loans, while Green Street Corporation is utilized to hold the bank's real estate assets for its physical locations.
- The bank has total assets of \$239.9 million as of March 31, 2026.
- In addition to its main office in Brownsburg, the bank has four additional offices in Indiana located in Avon, Brownsburg, Danville, and Plainfield.
- The bank operates five full-service ATMs, with one located at each of the five offices.
- As shown in the table below, the bank's primary business focuses are commercial and residential real estate lending, which together comprise the majority of the loan portfolio (91.4 percent).

Table 1

Composition of Loan Portfolio as of March 31, 2026		
Loan Type	\$(000)	%
Commercial	83,362	58.5
Residential Real Estate	46,910	32.9
Consumer	9,201	6.5
Agricultural	3,111	2.2
Gross Loans	142,584	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 April 11, 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 Indianapolis-Carmel-Greenwood, IN MSA 26900 AA consists of the entirety of Hendricks County, Indiana (see Appendix A for additional demographic data).

- There have been no changes to the bank's AA delineation since the previous examination.
- Based on updates from the 2020 Decennial Census and the 2016-2020 American Community Survey (ACS), the number of census tracts in the AA has increased from 21 to 31, and the number of moderate-income census tracts has decreased from two to one. These changes result in an overall composition of zero low-income, one moderate-income, 18 middle-income, and 12 upper-income census tracts. Additionally, given that the AA is entirely within an MSA, there are no distressed and/or underserved census tracts within the assessment area.
- As of June 30, 2025, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Hendricks County Bank and Trust Company's deposit market share was 4.5 percent of the insured deposits in Hendricks County, ranking eighth among 19 FDIC-insured institutions in the county. The financial institutions comprising the largest percentage of the deposit market share are JPMorgan Chase Bank (17.6 percent), PNC Bank (11.3 percent), and State Bank (11.1 percent). Additionally, based on 2024 aggregate lending data, Hendricks County Bank and Trust Company ranked 44th among 309 HMDA-reporters in loan originations in the AA.
- Two community representatives were contacted in connection with this examination to provide information regarding economic conditions in the AA. One representative contacted was from an organization that provides career resource and educational training assistance while the other representative was from an organization that focuses on community development opportunities.

Table 2

Population Change			
Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA			
Area	2015 Population	2020 Population	Percent Change
Assessment Area	153,435	174,788	13.9
Indianapolis-Carmel-Greenwood, IN MSA 26900	1,928,597	2,089,673	8.4
State of Indiana	6,568,645	6,785,528	3.3
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- As reflected in Table 2, according to the U.S. Census Bureau, the assessment area's population increased by 13.9 percent from 2015 to 2020. This is greater than both the entire Indianapolis-Carmel-Greenwood, IN MSA and state of Indiana, which experienced population increases of 8.4 percent and 3.3 percent, respectively, over the same period.
- Community representatives attributed the assessment area's increasing population to its proximity to the Indianapolis metropolitan area. The representatives anticipate the growth in population to continue. One representative indicated that there is development taking place in the eastern portion of Hendricks County, supporting the population growth within the county. Another representative stated that the population growth is associated with the strong infrastructure, school system, and employment opportunities.

Table 3

Median Family Income Change			
Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Assessment Area	90,197	95,431	5.8
Indianapolis-Carmel-Greenwood, IN MSA 26900	72,572	80,333	10.7
State of Indiana	66,777	73,265	9.7
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.			

- As reflected in Table 3, the assessment area's median family income (MFI) increased from \$90,197 in 2015, to \$95,431 in 2020, representing a 5.8 percent increase. In comparison to the entire Indianapolis-Carmel-Greenwood, IN MSA and the state of Indiana, which experienced MFI growth of 10.7 percent and 9.7 percent, respectively, the overall MFI in the assessment area remains greater by dollar.
- According to the U.S. Census Bureau, the assessment area is comprised of 45,201 families, in which 11.2 percent of the income levels are classified as low-income, 16.0 percent as moderate-income, 22.8 percent as middle-income, and 50.0 percent as upper-income. Within the AA, 4.0 percent of

families live below the poverty level, which is below both the entire Indianapolis-Carmel-Greenwood, IN MSA and the state of Indiana's poverty rates of 7.9 percent and 8.9 percent, respectively.

- Community representatives indicated that the increasing MFI is due to the availability of employment opportunities in the area. A representative explained that entry-level jobs offer average wages, but employees are commonly growing within their roles to positions of higher wages. The representatives have a positive outlook for earning prospects in the area as there are a considerable number of job opportunities available.

Table 4

Housing Cost Burden						
Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	82.2	45.9	37.3	68.2	33.8	12.3
Indianapolis-Carmel-Greenwood, IN MSA 26900	79.8	35.1	42.7	61.0	26.4	15.3
State of Indiana	74.9	33.3	41.2	58.8	23.7	14.9
<i>Cost Burden is housing cost that equals 30 percent or more of household income.</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2018-2022 Comprehensive Housing Affordability Strategy</i>						

- There are a total of 62,846 housing units within the AA. Of these units, 75.2 percent are owner-occupied, while 20.7 percent are rental units. Vacant housing units represent 4.0 percent of total units, which is below the vacancy rate for the state of Indiana at 10.4 percent.
- As reflected in Table 4, low-income renters and owners are significantly housing cost burdened in the AA, with 82.2 percent and 68.2 percent of these individuals paying more than 30.0 percent of their household income on housing.
- Low-income renters and owners are experiencing similar trends across the entire Indianapolis-Carmel-Greenwood, IN MSA and the state of Indiana.
- Community representatives indicated that affordable housing is insufficient in the assessment area. Although there are housing construction projects taking place in the county, the representatives explained that the new homes are highly priced, and generally out of reach for many buyers, including low- and moderate-income families. Further, a representative noted new rental properties being constructed in the area are considered higher-end, with unaffordable rents. A representative stated that limited affordable housing is a concern for businesses operating in or considering moving into the area, as the workforce often cannot afford to live in the communities they work in.

Table 5

Unemployment Rates					
Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA					
Area	2020	2021	2022	2023	2024
Assessment Area	5.1	2.7	2.4	2.7	3.4
Indianapolis-Carmel-Greenwood, IN MSA 26900	6.8	3.8	2.9	3.1	3.8
State of Indiana	7.3	3.9	3.1	3.4	4.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- According to the U.S. Bureau of Labor Statistics, the assessment area's unemployment rate of 3.4 percent is comparable to the unemployment rates of the entire Indianapolis-Carmel-Greenwood, Indiana MSA and the state of Indiana, of 3.8 percent and 4.2 percent, respectively.
- A community representative stated that the area's primary employers include logistics, manufacturing, healthcare, government, supply chain, and retail. A representative noted there have not been any significant employer closures or relocations impacting the area. However, the representatives indicated that although there are many job opportunities, challenges exist with employment in the area including a shortage of skilled workers in the trades, lack of public transportation, construction and congestion, and insufficient affordable housing options.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall Lending Test performance is Satisfactory. Overall, the bank is meeting the credit needs of its assessment area based on an analysis of the bank's lending activities. The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. The bank originated a majority of its loans, by number, inside the AA. The geographic distribution of loans reflects a reasonable dispersion throughout the AA, and lending activities reflect reasonable penetration among borrowers of different income levels and among businesses of different sizes. Small business loans received greater weight in the analysis given the bank's loan portfolio composition. Additionally, neither the bank nor the Federal Reserve Bank of Chicago have received any CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average LTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated FDIC-insured institutions. Similarly situated institutions were selected based on asset size, similar product portfolio, and operations within the AA and nearby surrounding counties.

The bank's LTD ratio is reasonable. Over the 16-quarter period from June 30, 2022, through March 31, 2026, the bank's LTD ratio averaged 59.6 percent. The ratio is lower than the average of most similarly situated financial institutions, as identified in the table below. The LTD ratio has decreased slightly since the previous evaluation when the bank had an average LTD ratio of 63.5 percent over a 17-quarter period. Through discussions with bank management, while the bank has experienced an increase in loan demand they have simultaneously experienced growth in deposits.

The following table compares the bank's LTD ratio to its local competitors.

Table 6

Comparative LTD Ratios June 30, 2022 – March 31, 2026			
Institution	Location	Asset Size \$(000)	LTD Ratio (%)
			16-Quarter Average
Hendricks County Bank and Trust Company	Brownsburg, IN	\$239,933	59.6
Similarly Situated Institutions			
Tri-County Bank and Trust Company	Roachdale, IN	303,415	83.9
Hoosier Heartland State Bank	Crawfordsville, IN	351,012	73.7
Home National Bank of Thorntown	Thorntown, IN	176,971	64.8
Home Bank SB	Martinsville, IN	431,685	62.5
First National Bank	Cloverdale, IN	\$420,165	49.8

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans by number inside the AA and majority by dollar outside the AA. The bank originated 57.2 percent of total loans by number inside the AA. When evaluating loans by type and number, the bank originated 58.1 percent of home mortgage loans and 55.6 percent of small business loans inside the AA. By dollar, the bank originated 46.2 percent of total loans inside the AA, which represents a decline from the previous evaluation, as the bank originated 63.5 percent of loans by dollar inside the AA. Through discussions with bank management, the lending by dollar outside of the AA is attributed to loan demand from existing customer relationships. Overall, the lending levels indicate that the bank is serving the credit needs of its local community.

The following table summarizes the bank's lending inside and outside its AA for HMDA-reportable loans and a sample of small business loans.

Table 7

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Mortgage	54	58.1	13,193	46.3	39	41.9	15,295	53.7
Small Business	25	55.6	3,777	45.7	20	44.4	4,486	54.3
Total Loans	79	57.2	16,970	46.2	59	42.8	19,781	53.8
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its 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. Peer data from 2024 was utilized in the home mortgage lending analysis as 2025 data was not available at the time of the evaluation.

Home Mortgage Lending

The geographic distribution of the combined 2024 and 2025 home mortgage lending is reasonable. The distribution of home mortgage lending in the moderate-income census tract of 3.7 percent was comparable to both the aggregate lending data (1.6 percent) and the demographic figure (1.7 percent). Through discussions with management, the minimal volume of home mortgage loans originated within the moderate-income census tract is attributed to lower application volume and demand for loans within the census tract.

The following table presents the geographic distribution of HMDA-reportable loans originated within the AA in 2024 and 2025.

Table 8

Distribution of 2024 to 2025 Home Mortgage Lending by Income Level of Geography Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA 26900							
Geographic Income Level	Bank and Aggregate Loans						Owner- Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	3.7	1.6	405	3.1	1.3	1.7
Middle	35	64.8	55.2	8,661	65.6	52.8	53.0
Upper	17	31.5	43.2	4,127	31.3	46.0	45.3
Total	54	100.0	100.0	13,193	100.0	100.0	100.0
<i>Source: 2024 - 2025 FFIEC Census Data 2016 - 2020 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of small business lending in the moderate-income tract was above the demographic figure. A sample of small business loans originated were reviewed, of which three, or 12.0 percent were originated in the moderate-income census tract, compared to the demographic measure of total businesses located in the moderate-income census tract, at 2.8 percent.

The following table presents the bank's geographic distribution of a sample of small business loans originated within the AA in 2025.

Table 9

Distribution of 2025 Small Business Lending by Income Level of Geography Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA 26900					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	3	12.0	567	15.0	2.8
Middle	8	32.0	834	22.1	63.3
Upper	14	56.0	2,377	62.9	33.9
Total	25	100.0	3,777	100.0	100.0
<i>Source: 2025 FFIEC Census Data 2025 Dun & Bradstreet Data 2016 - 2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different sizes. The bank's lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. Peer data from 2024 was utilized in the home mortgage lending analysis as 2025 data was not available at the time of the evaluation.

Home Mortgage Lending

The borrower distribution of the combined 2024 and 2025 home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers of 9.3 percent is above aggregate lending data of 4.3 percent and comparable to the demographic figure of 11.2 percent. The distribution of home mortgage lending to moderate-income borrowers of 14.8 percent is below aggregate lending data of 18.1 percent and comparable to the demographic figure of 16.0 percent.

Community representatives indicated that the assessment area has a shortage of affordable housing, creating challenges for low- and moderate-income borrowers.

The table below presents the borrower distribution of HMDA-reportable loans originated by the bank within the AA in 2024 and 2025.

Table 10

Distribution of 2024 to 2025 Home Mortgage Lending by Borrower Income Level Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA 26900							
Geographic Income Level	Bank and Aggregate Loans						Owner- Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	5	9.3	4.3	418	3.2	2.0	11.2
Moderate	8	14.8	18.1	1,219	9.2	14.0	16.0
Middle	10	18.5	25.0	2,131	16.2	23.6	22.8
Upper	14	25.9	32.3	6,125	46.4	35.1	50.0
Unknown	17	31.5	20.3	3,300	25.0	25.3	0.0
Total	54	100.0	100.0	13,193	100.0	100.0	100.0
Source: 2024 - 2025 FFIEC Census Data 2016 - 2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The borrower distribution of small business lending is reasonable. A sample of small business loans originated in 2025 were reviewed, of which 16, or 64.0 percent were to businesses with annual revenues of one million dollars or less. The distribution of small business lending to businesses with annual revenues of one million dollars or less was below the demographic figure of 92.9 percent. However, of the 16 loans made to businesses with annual revenues of one million dollars or less, 12, or 75.0 percent, were made in amounts of 100,000 dollars or less. These loans are considered the most beneficial to small businesses, indicating the bank's willingness to meet the needs of small businesses within the AA. Further, community representatives indicated local financial institutions are helping to meet the credit needs of the community.

The following table presents the distribution of a sample of small business loans by revenue size originated by the bank within the AA in 2025.

Table 11

Distribution of 2025 Small Business Lending by Revenue Size of Businesses Assessment Area: Indianapolis-Carmel-Greenwood, IN MSA 26900					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	16	64.0	2,129	56.4	92.9
Over \$1 Million	9	36.0	1,648	43.6	5.9
Revenue Unknown	0	0.0	0	0.0	1.1
Total	25	100.0	3,777	100.0	100.0
By Loan Size					
\$100,000 or Less	17	68.0	696	18.4	
\$100,001 – \$250,000	2	8.0	319	8.4	
\$250,001 – \$1 Million	6	24.0	2,763	73.2	
Total	25	100.0	3,777	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	12	75.0	462	21.7	
\$100,001 – \$250,000	1	6.3	200	9.4	
\$250,001 – \$1 Million	3	18.8	1,467	68.9	
Total	16	100.0	2,129	100.0	
Source: 2025 FFIEC Census Data 2025 Dun & Bradstreet Data 2016 – 2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

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 – DEMOGRAPHIC INFORMATION

Table A-1

2025 Indianapolis-Carmel-Greenwood, IN MSA 26900 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	5,077	11.2
Moderate	1	3.2	871	1.9	131	15.0	7,238	16.0
Middle	18	58.1	24,452	54.1	1,436	5.9	10,298	22.8
Upper	12	38.7	19,878	44.0	236	1.2	22,588	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	31	100.0	45,201	100.0	1,803	4.0	45,201	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	1,764	803	1.7	45.5	883	50.1	78	4.4
Middle	35,235	25,068	53.0	71.1	8,427	23.9	1,740	4.9
Upper	25,847	21,416	45.3	82.9	3,710	14.4	721	2.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	62,846	47,287	100.0	75.2	13,020	20.7	2,539	4.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	156	2.8	142	2.8	13	4.0	1	1.6
Middle	3,510	63.3	3,256	63.2	217	66.0	37	59.7
Upper	1,876	33.9	1,753	34.0	99	30.1	24	38.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	5,542	100.0	5,151	100.0	329	100.0	62	100.0
Percentage of Total Businesses:				92.9		5.9		1.1
Source: 2025 FFIEC Census Data								
2016 – 2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX B – 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.

Combined Statistical Area (CSA): As defined by the Office of Management and Budget, a CSA is a combination of adjacent metropolitan statistical areas and micropolitan statistical areas that demonstrate economic or social linkage.

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 Division (MD): As defined by the Office of Management and Budget, an MD is a division of a metropolitan statistical area based on specific criteria including commuting patterns. Only a metropolitan statistical area that has a population of at least 2.5 million may be divided into MDs.

Metropolitan Statistical Area (MSA): 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.

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.