

# **PUBLIC DISCLOSURE**

**August 5, 2024**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Midwest BankCentre  
RSSD #657459**

**2191 Lemay Ferry Road  
St. Louis, Missouri 63125**

**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.

## TABLE OF CONTENTS

I.	Institution Rating .....	1
II.	Institution	
	a. Description of Institution .....	2
	b. Scope of Examination .....	3
	c. Description of Assessment Area .....	5
	d. Conclusions with Respect to Performance Tests .....	9
	e. Fair Lending or Other Illegal Credit Practices Review .....	16
III.	Appendices	
	a. Scope of Examination Tables .....	17
	b. Lending Performance Tables .....	18
	c. Glossary .....	25

**INSTITUTION'S CRA RATING: This institution is rated OUTSTANDING.**

The following table shows the performance level of Midwest BankCentre with respect to the Lending, Investment, and Service Tests.

Midwest BankCentre			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors supporting the institution's rating include the following:

- The bank's lending levels reflect excellent responsiveness to credit needs of the assessment area.
- An adequate percentage of loans are made in the assessment area.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects excellent penetration throughout the assessment area.
- The bank is a leader in making community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the assessment area credit needs.
- The bank makes an excellent level of qualified community development investments and grants and is often in the leadership position.
- Service delivery systems are readily accessible to the bank's assessment area, and the bank's record of opening and closing branches does not adversely affect the accessibility of its service delivery systems.
- The bank is a leader in providing community development services.

## DESCRIPTION OF INSTITUTION

Midwest BankCentre is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Midwest BankCentre, Inc., a one-bank holding company. Both the bank and its holding company are headquartered in St. Louis, Missouri.

The bank's branch network consists of 16 offices across one assessment area and one loan production office (LPO). There is one full-service, on-site automated teller machine (ATM) at 15 of the 16 branches, and there are two full-service, on-site ATMs at the remaining branch. All of the bank's offices are located in the Missouri portion of the St. Louis, Missouri-Illinois metropolitan statistical area (MSA), with the exception of the LPO, which is located in the Illinois portion of the St. Louis MSA. During the review period, the bank closed two branches and opened one new branch. Based on this branch network and other service delivery systems, the bank is generally positioned to deliver financial services to its entire assessment area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of the assessment area, and the bank is capable of meeting assessment area credit needs based on its available resources and financial products. As of June 30, 2024, the bank reported total assets of \$2.8 billion, which represents a 17.0 percent increase since the previous examination. As of the same date, loans and leases outstanding were \$2.2 billion, while deposits totaled \$2.3 billion.

The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of June 30, 2024		
Credit Category	Amount \$ (000s)	Percentage of Total Loans
Commercial Real Estate	\$787,449	36.3%
Commercial and Industrial	\$538,155	24.8%
1-4 Family Residential	\$373,995	17.3%
Construction and Development	\$204,964	9.5%
Multifamily Residential	\$186,971	8.6%
Loans to Individuals	\$73,658	3.4%
Total Other Loans	\$1,203	0.1%
<b>TOTAL</b>	<b>\$2,166,395</b>	<b>100%</b>

As indicated by the table above, a significant portion of the bank's lending resources are directed to loans secured by commercial real estate and commercial and industrial loans. Other significant loan products include loans secured by 1-4 family residential properties. The bank also originates and subsequently sells a significant volume of loans secured by residential real estate. As these loans are sold on the secondary market shortly after origination, this activity is not captured in the table.

The bank received an Outstanding rating at its previous CRA evaluation conducted by this Reserve Bank on February 22, 2022.

## SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) Large Institution CRA Examination Procedures, which include a Lending Test, Investment Test, and Service Test. Performance under these tests is rated at the institution level.

To augment this evaluation, one community contact interview was utilized. This interview helped to ascertain certain economic and demographic conditions, as well as credit needs and opportunities, in the bank's assessment area and provided context with which to evaluate the bank's responsiveness to these credit needs. Key details from this community contact interview are included in the *Description of Assessment Area* section.

### Lending Test

Under the Lending Test, the bank's performance is evaluated using the following criteria and time periods.

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	<ul style="list-style-type: none"><li>Small business loans reported under the CRA</li><li>Home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA)</li></ul>	January 1, 2021 – December 31, 2022
Assessment Area Concentration		
Loan Distribution by Borrower's Profile		
Geographic Distribution of Loans		
Community Development Lending Activities		February 22, 2022 – August 4, 2024
Product Innovation <sup>1</sup>		

As shown in the preceding table, small business and HMDA loans were used to evaluate the bank's lending performance, as these loans are considered the bank's core business lines based on lending volume and the bank's business strategy. Due to the bank's strategic focus on and larger volume of small business loans, slightly more weight was given to small business loans. Lastly, equal emphasis is placed on performance in 2021 and 2022 for both loan products.

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<sup>1</sup> Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

The bank's Lending Test performance is evaluated using the following criteria, as applicable:

- Level of lending activity
- Assessment areas concentration<sup>2</sup>
- Distribution of loans by borrower's income/revenue profile
- Geographic distribution of loans
- Community development lending activities
- Product innovation<sup>3</sup>

Under the previously noted borrower distribution and geographic distribution criteria, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation.

- Assessment area demographics are based on 2016 and 2020 American Community Survey (ACS) data, and business demographics are based on 2021 and 2022 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC's 2021 and 2022 annual estimates. The estimates 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 the area.
- Industry demographics are sourced from the 2022 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.
- Unemployment data are sourced from the U.S. Department of Labor, Bureau of Labor Statistics, and are not seasonally adjusted.
- 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 in that assessment area who are classified as either low- or moderate-income 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 the percentage of owner-occupied housing units in that assessment area that are in either low- or moderate-income census tracts or the percentage of businesses located in low- or moderate-income census tracts.

When analyzing bank performance, greater emphasis is placed on annually updated aggregate lending data, which is expected to describe many factors impacting lenders and to predict more relevant comparisons.

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<sup>2</sup> This criterion is applicable at the institution level only.

<sup>3</sup> Unlike other large bank CRA performance criteria, a lack of innovative or flexible lending practices does not necessarily impact the bank's performance negatively, as these activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, potentially resulting in a higher rating.

### **Investment Test**

All community development investments, including grants and donations, made since the previous CRA evaluation, were reviewed and evaluated. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

### **Service Test**

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation to the date of the current evaluation.

The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

## **DESCRIPTION OF ASSESSMENT AREA**

### **Bank Structure**

Midwest BankCentre has designated one CRA assessment area consisting of all geographies in St. Louis City, St. Louis County, Jefferson County, and St. Charles County, which are all in the Missouri portion of the St. Louis MSA. The assessment area consists of 474 census tracts, of which 54 are low-, 93 are moderate-, 162 are middle-, 159 are upper-, and 6 are unknown-income.

### **General Demographics**

According to 2020 ACS data, the assessment area population is 1,937,704. The majority of the population lives in St. Louis County, with 1,004,125 residents, followed by St. Charles County with a population of 405,262; St. Louis City with 301,578; and Jefferson County with 226,739. The bank's assessment area is highly competitive, with 68 Federal Deposit Insurance Corporation-insured depository institutions operating 514 branches throughout the assessment area. Of these institutions, Midwest BankCentre ranks 10<sup>th</sup>, with 2.0 percent of the deposit market share.

Competition for HMDA and CRA loans is similarly high. An analysis of 2022 HMDA-reportable loans shows that 572 institutions had loan activity in the assessment area, of which the bank originated less than 1.0 percent of total HMDA loans. There are 163 institutions with CRA loan activity in the assessment area, of which the bank accounted for less than 1.0 percent of total CRA loan activity.

The assessment area covers a metropolitan area with a diverse population and demographic composition. As such, there are numerous credit needs in the assessment area in addition to a standard blend of consumer and commercial loan and deposit products. Additionally, a community contact familiar with the assessment area pointed to a need for home improvement loans and multifamily affordable home loans, startup and working capital loans for small businesses, and financial literacy training initiatives. Furthermore, since the St. Louis MSA is an area with significant community development needs, combined with numerous nonprofit agencies, higher education institutions, and government assistance entities, there is a high level of community development opportunity available for financial institution participation.

### **Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
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%
<b>TOTAL</b>	<b>474</b>	<b>100%</b>	<b>491,525</b>	<b>100%</b>

As shown in the table above, 31.0 percent of census tracts in the assessment area are designated as low- and moderate-income (LMI), while 23.8 percent of assessment area families reside within those tracts. The majority of these LMI census tracts are concentrated in the city of St. Louis, specifically the area north of downtown St. Louis, and in northeast St. Louis County. Finally, 21.7 percent of all businesses operating in this assessment area are located in LMI geographies, and 19.5 percent of all owner-occupied housing units in the assessment area are located in LMI geographies.

Based on 2020 ACS data, the median family income for the assessment area was \$86,581. This income figure was higher than the median family income for the state of Missouri (\$72,834). More recently, the FFIEC estimated the median family income for the St. Louis MSA to be \$84,700 in 2021 and \$96,800 in 2022. The following table displays the distribution of assessment area families by income level compared to the state of Missouri as a whole.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>Missouri</b>	
Low	96,712	19.7%	317,471	20.5%
Moderate	86,138	17.5%	285,869	18.4%
Middle	101,461	20.6%	333,130	21.5%
Upper	207,214	42.2%	614,586	39.6%
<b>TOTAL</b>	<b>491,525</b>	<b>100%</b>	<b>1,551,056</b>	<b>100%</b>



While the first table in this section indicates only 31.0 percent of the family population resides in LMI geographies, the preceding table shows that a much larger percentage of families (37.2 percent) are considered LMI. This LMI family percentage is slightly lower than LMI family percentages of 38.9 percent statewide. Similarly, the percentage of families living below the poverty level in the assessment area (6.9 percent) is slightly below the 7.3 percent level in the state of Missouri. Considering these factors, overall, the assessment area appears only slightly more affluent than the state of Missouri. However, the assessment area consists of diverse geographies with different demographic makeups. For example, St. Louis City has an overall LMI family percentage of 54.2 percent, and 15.1 percent of St. Louis City families live below the poverty level. Conversely, in St. Charles County, only 26.4 percent of families are considered LMI, with 3.1 percent of families living below the poverty level.

### **Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Missouri.

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$198,271	33.9%	\$943
Missouri	\$163,600	35.0%	\$843

Based on the table above, homeownership in the assessment area is slightly less affordable when compared to the state of Missouri, but affordability varies across the city and counties. Affordability ratios range from a high of 40.3 percent in Jefferson County to a low of 31.9 percent in St. Louis City. The median gross rent also varies significantly by county, from a low of \$840 in St. Louis City to a high of \$1,069 in St. Charles County. Additionally, as noted by the community contact, affordable home improvement loans are a significant credit need in some portions of the assessment area, such as the city of St. Louis, where much of the housing stock is old and in disrepair. The average age of housing stock in the assessment area counties, including Jefferson County (36 years), St. Charles County (27 years), St. Louis County (52 years), and the city of St. Louis (76 years), has exacerbated the need for home repairs, which many LMI residents are unable to afford. Given this information, affordable housing is likely a challenge for many LMI residents across the assessment area.

### **Industry and Employment Demographics**

The St. Louis assessment area supports a large and diverse business community. County business patterns indicate that there are 1,018,267 paid employees in both private and government industries in the assessment area, with the three largest industries by number of paid employees being healthcare and social assistance (16.9 percent), government (10.1 percent), and retail trade (9.1 percent). The assessment area also supports a strong small business sector, with 90.3 percent of assessment area businesses having annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Missouri
2022	2.5%	2.6%
2023	3.0%	3.1%
January–July 2024	3.7%	3.9%

As shown in the table above, unemployment levels in the assessment area mirrored that of Missouri as a whole. Unemployment levels in the assessment area were highest in the city of St. Louis and St. Louis County, which remained higher than statewide Missouri levels throughout the review period but experienced a downward trend following the 2020 COVID-19 pandemic and have since remained stable.

### **Community Contact Information**

One community contact interview was referenced during this examination with an individual specializing in community service and economic development in the St. Louis metro area. The contact characterized the local economy as slowly improving following the COVID-19 pandemic, while also noting that small businesses are still struggling to recover. According to the contact, there is a need for investment in small businesses throughout the assessment area following the end of the Small Business Administration’s Paycheck Protection Program (PPP). Additionally, the contact noted that while the housing market is improving, there is a large need for affordable housing, specifically for the aging population. Housing stock is also a concern, as there is a healthy supply of housing in the assessment area, but the homes would need to be renovated before being occupied. The contact specifically noted the northern portions of the assessment area (north city of St. Louis and northeast St. Louis County) are particularly impacted by the lack of small business investment and aging housing stock. Per details from the interviewee, these areas have experienced persistent poverty and are not keeping pace with the surrounding areas economically.

The contact noted financial literacy programs focused on the benefits of traditional deposit and savings accounts would significantly benefit LMI individuals and communities. Additionally, credit counseling services to establish or reestablish credit and first-time homebuyer programs to educate prospective buyers on the costs associated with homeownership would be beneficial by providing resources for upward economic mobility.

According to the contact, most banks are meeting the credit needs of the community through partnerships with local organizations; however, consistent with previous comments, some areas in north city of St. Louis and northeast St. Louis County were noted to have limited access to banking services. Furthermore, the contact noted a strong need for financial education programs in the assessment area that target the needs of the unbanked population. According to the contact, many residents in high-minority, low-income areas are unbanked due to the lack of traditional bank branches and ATMs in LMI geographies.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The bank's performance under the Lending Test is rated outstanding. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Excellent
Assessment Areas Concentration	Adequate Percentage Inside
Borrower Distribution	Adequate
Geographic Distribution	Excellent
Community Development Loans	Leader in Making
Product Innovation	Makes Extensive Use
<b>OVERALL</b>	<b>OUTSTANDING</b>

### Lending Activity

The following table displays the bank's combined 2021 and 2022 lending volume in the St. Louis assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	#	%	\$ (000s)	%
<b>Small Business</b>	<b>1,889</b>	<b>60.8%</b>	<b>\$373,316</b>	<b>50.1%</b>
<b>HMDA</b>				
Home Improvement	33	1.2%	\$3,977	0.6%
Home Purchase	502	18.1%	\$135,264	20.2%
Multifamily Housing	49	1.8%	\$64,497	9.6%
Refinancing	633	22.8%	\$167,103	24.9%
Other Purpose Closed/Exempt	3	0.1%	\$579	0.1%
<b>Total HMDA</b>	<b>1,220</b>	<b>39.2%</b>	<b>\$371,420</b>	<b>49.9%</b>
<b>TOTAL LOANS</b>	<b>3,109</b>	<b>100.00%</b>	<b>\$744,736</b>	<b>100.00%</b>

The bank ranked 42<sup>nd</sup> in total number of HMDA loan originations and purchases out of 583 lenders in 2021 and 46<sup>th</sup> out of 572 lenders in 2022. For total number of CRA small business loan originations and purchases, the bank ranked 11<sup>th</sup> out of 196 lenders in 2021 and 17<sup>th</sup> out of 163 lenders in 2022. As a result, the bank's lending levels reflect excellent responsiveness to the credit needs of the assessment area.

### 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 assessment area.

Lending Inside and Outside of Assessment Area						
January 1, 2021 through December 31, 2022						
Loan Type	Inside Assessment Area		Outside Assessment Area		TOTAL	
Small Business	1,889	74.5%	646	25.5%	3,451	100%
	\$373,316	71.7%	\$132,361	26.2%	\$505,677	100%
HMDA	1,220	64.7%	665	35.3%	1,885	100%
	\$371,420	63.1%	\$217,267	36.9%	\$588,687	100%
TOTAL LOANS	3,109	70.3%	1,311	29.3%	4,420	100%
	\$744,736	68.0%	\$349,628	32.0%	\$1,094,364	100%

An adequate number of loans were made inside the assessment area. As shown above, 70.3 percent of the bank's total small business and HMDA loans were made inside the assessment area, representing 68.0 percent of loans by dollar volume.

### Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's profile is adequate. As previously discussed, HMDA lending received less weight toward the overall conclusion than small business lending.

#### *Small Business Lending*

In 2021, the bank originated 28.9 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is well below the aggregate lending levels (50.3 percent) and the demographic figure (90.0 percent). However, a significant number of the bank's 2021 small business loans (60.8 percent) had unknown revenues due to the bank's participation in the PPP. In accordance with PPP guidelines, the bank was not required to collect revenue information for loans originated through this program. Further, the average dollar amount for PPP loans originated in 2021 was \$112,000. Therefore, when considering this factor, the bank's performance is adequate in 2021.

In 2022, the bank originated 41.4 percent of its small business loans to businesses with annual revenues of \$1 million or less, a 12.5 percent increase from 2021. With this increase, bank performance is more closely approaching the aggregate lending levels of 53.2 percent, which remained relatively stable from 2021, while still trailing the demographic level of 90.3 percent. Therefore, the distribution of small business loans by business revenue profile remains adequate for 2022 and is adequate overall.

### *HMDA Lending*

The distribution of HMDA loans to low-income borrowers is considered good in both 2021 (9.3 percent) and 2022 (17.3 percent). The bank's performance is above the performance of peer institutions in the assessment area in 2021 (7.5 percent) and 2022 (10.4 percent) but below the demographic figure in both years, which was 20.9 percent and 19.7 percent, respectively.

In 2021, the bank made 18.7 percent of its HMDA loans to moderate-income borrowers, reflecting excellent performance when compared to peer institutions in the assessment area (16.5 percent) and demographic levels (16.7 percent). In 2022, the bank's performance (16.3 percent) slightly fell, trailing both aggregate (19.4 percent) and demographic levels (17.5 percent), reflecting adequate performance. Overall LMI lending levels were considered good in both years.

### **Geographic Distribution of Loans**

The bank's overall geographic distribution of loans in the assessment area is excellent.

### *Small Business Lending*

The bank's record of lending to small businesses in LMI geographies is excellent overall. In 2021, the bank made 9.8 percent of its small business loans in low-income geographies, exceeding both aggregate lending levels (5.9 percent) and the demographic figure (6.5 percent). Similarly, the bank originated 23.9 percent of its small business loans in moderate-income census tracts, which is higher than peer institutions in the assessment area (17.2 percent) and the demographic figure (18.1 percent).

The bank's performance in 2022 was similar. The bank made 16.6 percent of its small business loans in low-income census tracts, significantly exceeding both aggregate lending levels (6.2 percent) and demographic levels (7.1 percent), reflecting excellent performance. Small business lending in moderate-income census tracts is considered adequate, as the bank's level of small business lending (11.5 percent) slightly trails both aggregate (13.2 percent) and demographic (14.6 percent) levels. Furthermore, the bank's total small business lending in LMI geographies (28.1 percent) exceeds both total aggregate lending in LMI geographies (19.4 percent) and demographic levels (21.7 percent), representing excellent performance overall in 2022.

### *HMDA Lending*

The bank's distribution of HMDA loans to both low- and moderate-income geographies is considered good in 2021. The bank originated 2.2 percent of its HMDA loans in low-income geographies, which is above peer institutions in the assessment area (1.8 percent) and slightly below demographic levels (4.8 percent). In that same year, the bank's HMDA lending in moderate-income geographies (15.7 percent) is also considered good, as the bank's performance exceeds aggregate lenders (12.3 percent) and is in line with demographic levels (17.3 percent).

HMDA lending in 2022 is excellent in both low- and moderate-income census tracts. The bank originated 6.6 percent of its HMDA loans in low-income geographies and 17.3 percent in

moderate-income geographies. These exceed both aggregate lending performance (3.3 percent and 14.2 percent, respectively) and demographic levels (4.5 percent and 15.0 percent, respectively).

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 87.6 percent of all assessment area census tracts and 81.5 percent of all LMI geographies. In 2022, the bank had lending activity in 68.4 percent of census tracts in the assessment area and 64.6 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is excellent.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the St. Louis assessment area. During the review period, the bank made 31 community development loans totaling \$141.1 million. These community development loans supported various community development purposes, including affordable housing (15), economic development (4), and revitalization and stabilization (12). Of the community development loans that supported affordable housing for LMI individuals, 5 loans totaling \$31.0 million utilized Low-Income Housing Tax Credit (LIHTC) funds to finance affordable multifamily housing developments in the city of St. Louis and St. Louis County. The most impactful of these loans are discussed below.

- The bank originated two community development loans with a purpose of funding affordable senior housing. One loan totaling \$11.0 million is financing a 64-unit multifamily senior housing development using LIHTC funds in a moderate-income census tract in south St. Louis City. This project is in conjunction with two community organizations specializing in economic development and senior services. The second loan, totaling \$2.8 million, is financing a 36-unit LIHTC development in Pagedale, Missouri, in partnership with Beyond Housing and BJC Healthcare. As noted by the community contact and assessment area housing demographics, the assessment area has a need for affordable housing options for LMI senior borrowers.
- The bank financed several community development loans for various commercial and residential real estate construction projects that qualified as either revitalization/stabilization of LMI geographies or economic development by supporting permanent LMI job creation for small businesses. One loan totaling \$4.0 million financed the development of a retail center in a moderate-income census tract in north St. Louis County. In 2023, the bank opened a branch in the retail center, which serves as an anchor business to the remaining entities, including a rehabilitation center and a pharmacy. This loan is considered impactful given the responsiveness to community needs for essential and financial services.

### **Product Innovation**

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of its assessment area. Loans originated under these programs are given quantitative consideration under the Lending Test; however, the programs themselves are given qualitative consideration in the evaluation of the bank's CRA performance in relation to the use of flexible lending practices.

- *Affordable Home Improvement Loan (AHIL):* These loans are targeted to assessment area borrowers in LMI census tracts who would like to improve their dwelling or property. During the review period, 35 AHILs were originated totaling \$228,333.
- *Credit Booster loans:* These loans are designed to help borrowers establish credit or improve credit history by obtaining a loan and depositing the proceeds into a certificate of deposit (CD) account. Loan payments are made to pay off the loan, and after all payments are made, the customer has established some credit history and has a CD, which improves their savings. During the review period, 416 Credit Booster loans were originated at a total of \$174,852.
- *Portfolio 0% Down:* The product is intended for LMI borrowers or borrowers located in LMI geographies. The program features terms that are more flexible than traditional government-insured loans, such as a zero-down payment, cancellable mortgage insurance, and flexible funding source options including gifts and grants. During the review period, the bank made 18 of these loans totaling \$2.6 million.
- *Missouri Housing Development Commission:* Through the First Place Loan program, the bank is a certified lender that provides home loans that include down payment and closing cost assistance to LMI first-time homebuyers. During the review period, the bank originated 11 loans totaling \$2.1 million through this program.
- *Federal Home Loan Bank of Des Moines Home\$tart® program:* Through this program, the bank provides up to \$7,500 in down payment and closing cost assistance to LMI first-time homebuyers. During the review period, the bank assisted 76 borrowers with down payment assistance through this program totaling \$11.9 million.
- *Federal Housing Administration/U.S. Department of Veterans Affairs/U.S. Department of Agriculture (USDA) Rural Development Insured Loan programs:* These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payments. Further, the USDA program is designed to assist LMI individuals in purchasing affordable housing in rural areas and features no down payment or mortgage insurance requirements. During the review period, the bank originated 226 loans totaling \$49.3 million through these programs.
- *HomeReady/Home Possible®:* These mortgage programs offered through Fannie Mae and Freddie Mac are available to all LMI borrowers. The programs feature terms that are more flexible than traditional government-insured loans, such as a lower down payment,

cancellable mortgage insurance, and flexible funding source options such as gifts and grants. During the review period, the bank originated 67 loans through these programs totaling \$11.9 million.

- *Emergency Assistance Loan:* This is an unsecured consumer loan product tailored to meet the needs of consumers impacted by an emergency event or disaster. This product features lower interest rates than the bank's typical unsecured loan products, no fees, a 45-day deferral for the first payment, and flexible evaluation of income for underwriting purposes. These loans were especially impactful for LMI borrowers given the flexible underwriting criteria and low cost. The bank originated four loans totaling \$34,000 during the review period.
- *Alternative Payday Loan:* The product is an alternative payday loan to help meet an identified credit need in the assessment area as an alternative to the traditional payday loan. This product offers flexible underwriting criteria, no fees, longer repayment periods, and lower interest rates when compared to traditional payday loans. During the review period, the bank originated 56 loans totaling \$44,397.

## INVESTMENT TEST

The bank's Investment Test performance in the St. Louis assessment area is rated outstanding. The bank is a leader in making qualified community development investments and grants in the assessment area and is often in a leadership position. The bank made 12 new qualified community development investments totaling \$19.5 million in addition to 25 investments made prior to this review period but still outstanding totaling \$6.1 million. The bank also exhibits excellent responsiveness to credit and community development needs and makes significant use of innovative and/or complex investments to support community development initiatives. The following investments were notable for their responsiveness to the assessment area.

- The bank made 9 current-period investments totaling \$18.2 million and 13 prior-period investments totaling \$2.7 million for affordable housing in the assessment area. One current-period investment for \$10.5 million utilizes LIHTC equity from both state and federal funds to support the development of affordable housing in a low-income census tract.
- The bank continues to invest in one project from a prior period to finance a senior center for low-income individuals through the bank's 24:1 initiative. This initiative was developed by Beyond Housing in partnership with Midwest BankCentre to serve the 24 municipalities located in the Normandy Schools Collaborative and address current community challenges, particularly affordable housing.

In addition to these investments, the bank made 127 qualifying community development donations totaling \$756,421. These donations supported community service organizations providing educational and health services, as well as a variety of economic development organizations operating throughout the assessment area. Finally, after meeting the needs of its assessment area, the bank made 56 investments totaling \$54.7 million and three donations totaling \$15,500 outside



of its assessment area. Of the new investments made during this review period, \$17.2 million were mortgage-backed securities providing affordable housing loans to LMI borrowers.

## **SERVICE TEST**

The bank's performance under the Service Test in the St. Louis assessment area is rated outstanding. The following table displays the bank's performance under the Service Test.

<b>Service Test Summary</b>	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader in Providing

### **Accessibility of Delivery Systems**

The bank operates 16 branches in its assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown-</b>	
Branches	1	7	6	2	0	<b>16</b>
	6.3%	43.8%	37.5%	12.5%	0.0%	<b>100%</b>
Census Tracts	11.4%	19.6%	34.2%	33.5%	1.3%	<b>100%</b>
Household Population	8.1%	18.3%	37.4%	35.7%	0.5%	<b>100%</b>

Based on data in the preceding table, the bank operates 50.1 percent of its assessment area branches in LMI census tracts. This distribution is well above the percentage of assessment area census tracts that are LMI (31.0 percent) and the household population in LMI census tracts (26.4 percent). Therefore, the bank's overall delivery systems are readily accessible to areas and individuals of different income levels in the assessment area.

### **Changes in Branch Locations**

During the review period, the bank closed one branch in a low-income census tract and one branch in an upper-income census tract, while also opening one branch in a moderate-income census tract. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The bank's branches in the

assessment area offer consistent lobby hours Monday through Friday during standard business hours from 9:00 a.m. to 5:00 p.m. Additionally, 14 of the 16 branches offer drive-through hours consistent with lobby hours. Most branches, including those in LMI census tracts, offer Saturday lobby banking hours and drive-up facilities. Lastly, all offices in the assessment area offer the same deposit and loan products, and lenders are equally dispersed throughout the bank's branch locations in the assessment area.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 51 bank employees provided 135 community development services to 53 different organizations in the assessment area. These efforts consisted of bank employees providing financial literacy training and education targeted to LMI individuals at schools with a majority of students receiving free and reduced-price lunch benefits and through community service organizations. Additionally, 12 bank employees served as members of boards of directors and provided technical assistance to 14 separate community service and development organizations that support a variety of community development purposes throughout the assessment 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.

**APPENDIX A – SCOPE OF EXAMINATION TABLES**

Scope of Examination		
TIME PERIOD REVIEWED	January 1, 2021 – December 31, 2022 for small business and HMDA lending	
	February 22, 2022 – August 4, 2024 for community development loans, investment, and service activities	
FINANCIAL INSTITUTION	PRODUCTS REVIEWED	
Midwest BankCentre St. Louis, Missouri	Small Business HMDA	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
N/A	N/A	N/A

APPENDIX B – LENDING PERFORMANCE TABLES

ST. LOUIS ASSESSMENT AREA

Borrower Distribution of 2021 Small Business Loans Assessment Area: St. Louis								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	367	28.9%	50.3%	\$75,085	36.1%	28.6%	90.0%
	Over \$1 Million/ Unknown	903	71.1%	49.7%	\$132,952	63.9%	71.4%	10.0%
	<b>TOTAL</b>	<b>1,270</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$208,037</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	741	58.3%	89.3%	\$26,429	12.7%	27.7%	
	\$100,001– \$250,000	239	18.8%	5.3%	\$39,419	18.9%	17.0%	
	\$250,001– \$1 Million	290	22.8%	5.4%	\$142,189	68.3%	55.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>1,270</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$208,037</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	162	44.1%		\$8,800	11.7%	
		\$100,001– \$250,000	100	27.2%		\$16,235	21.6%	
		\$250,001– \$1 Million	105	28.6%		\$50,050	66.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>367</b>	<b>100.0%</b>		<b>\$75,085</b>	<b>100.0%</b>	

Borrower Distribution of 2022 Small Business Loans								
Assessment Area: St. Louis								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	256	41.4%	53.2%	\$55,674	33.7%	29.2%	90.3%
	Over \$1 Million/ Unknown	363	58.6%	46.8%	\$109,605	66.3%	70.8%	9.7%
	<b>TOTAL</b>	<b>619</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$165,279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	218	35.2%	92.3%	\$12,947	7.8%	30.8%	
	\$100,001– \$250,000	172	27.8%	3.7%	\$30,810	18.6%	15.2%	
	\$250,001– \$1 Million	229	37.0%	4.1%	\$121,522	73.5%	54.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>619</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$165,279</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	109	17.6%		\$6,487	3.9%	
		\$100,001– \$250,000	69	11.1%		\$11,789	7.1%	
		\$250,001– \$1 Million	78	12.6%		\$37,398	22.6%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>256</b>	<b>41.4%</b>		<b>\$55,674</b>	<b>33.7%</b>	

Borrower Distribution of 2021 Home Mortgage Lending Assessment Area: St. Louis								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
		#	# %	# %	\$	\$ %	\$ %	
Home Purchase	Low	31	12.4%	9.7%	4,223	6.5%	5.0%	20.9%
	Moderate	53	21.2%	19.2%	9,744	15.0%	13.6%	16.7%
	Middle	36	14.4%	17.9%	8,671	13.4%	16.7%	19.6%
	Upper	88	35.2%	29.7%	32,918	50.8%	42.4%	42.8%
	Unknown	42	16.8%	23.5%	9,306	14.3%	22.4%	0.0%
	<b>TOTAL</b>	<b>250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64,862</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	45	8.2%	6.3%	4,524	3.2%	3.2%	20.9%
	Moderate	103	18.8%	15.4%	15,074	10.8%	10.3%	16.7%
	Middle	114	20.8%	19.8%	20,902	15.0%	16.5%	19.6%
	Upper	259	47.3%	35.8%	93,178	66.9%	47.2%	42.8%
	Unknown	26	4.8%	22.7%	5,531	4.0%	22.7%	0.0%
	<b>TOTAL</b>	<b>547</b>	<b>100.0%</b>	<b>100.0%</b>	<b>139,209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	9.1%	6.3%	28	1.5%	3.5%	20.9%
	Moderate	0	0.0%	14.5%	0	0.0%	10.0%	16.7%
	Middle	3	27.3%	21.6%	317	16.8%	18.0%	19.6%
	Upper	3	27.3%	52.9%	735	38.9%	60.2%	42.8%
	Unknown	4	36.4%	4.7%	811	42.9%	8.3%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,891</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans	Low	1	3.6%	0.2%	320	1.7%	0.0%	N/A
	Moderate	0	0.0%	0.2%	0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	N/A
	Upper	0	0.0%	2.7%	0	0.0%	0.5%	N/A
	Unknown	27	96.4%	96.8%	18,719	98.3%	99.5%	N/A
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19,039</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total	Low	78	9.3%	7.5%	9,095	4.0%	3.7%	20.9%
	Moderate	156	18.7%	16.5%	24,818	11.0%	11.1%	16.7%
	Middle	153	18.3%	19.0%	29,890	13.3%	15.8%	19.6%
	Upper	350	41.9%	34.1%	126,831	56.4%	43.6%	42.8%
	Unknown	99	11.8%	22.9%	34,367	15.3%	25.8%	0.0%
	<b>TOTAL</b>	<b>836</b>	<b>100.0%</b>	<b>100.0%</b>	<b>225,001</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of 2022 Home Mortgage Lending Assessment Area: St. Louis								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
		#	# %	# %	\$	\$ %	\$ %	
Home Purchase	Low	48	19.0%	10.1%	6,437	9.1%	5.1%	19.7%
	Moderate	46	18.3%	19.7%	9,130	13.0%	14.2%	17.5%
	Middle	37	14.7%	18.6%	8,280	11.8%	17.6%	20.6%
	Upper	63	25.0%	28.6%	29,735	42.2%	41.8%	42.2%
	Unknown	58	23.0%	23.0%	16,820	23.9%	21.3%	0.0%
	<b>TOTAL</b>	<b>252</b>	<b>100.0%</b>	<b>100.0%</b>	<b>70,402</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	17	19.8%	12.4%	1,744	6.3%	6.7%	19.7%
	Moderate	12	14.0%	21.4%	1,737	6.2%	15.6%	17.5%
	Middle	11	12.8%	20.5%	2,149	7.7%	18.6%	20.6%
	Upper	33	38.4%	28.1%	17,424	62.5%	41.4%	42.2%
	Unknown	13	15.1%	17.7%	4,840	17.4%	17.7%	0.0%
	<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27,894</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	4.5%	8.0%	72	3.5%	5.1%	19.7%
	Moderate	4	18.2%	16.1%	327	15.7%	11.2%	17.5%
	Middle	6	27.3%	22.6%	290	13.9%	18.4%	20.6%
	Upper	5	22.7%	50.2%	683	32.7%	60.9%	42.2%
	Unknown	6	27.3%	3.2%	714	34.2%	4.4%	0.0%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,086</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
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%	0.2%	0	0.0%	0.1%	N/A
	Unknown	21	100.0%	99.8%	45,458	100.0%	99.9%	N/A
	<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45,458</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total	Low	66	17.3%	10.4%	8,253	5.7%	5.0%	19.7%
	Moderate	62	16.3%	19.4%	11,194	7.7%	12.9%	17.5%
	Middle	54	14.2%	19.4%	10,719	7.3%	16.0%	20.6%
	Upper	101	26.5%	31.0%	47,842	32.8%	38.6%	42.2%
	Unknown	98	25.7%	19.8%	67,832	46.5%	27.5%	0.0%
	<b>TOTAL</b>	<b>381</b>	<b>100.0%</b>	<b>100.0%</b>	<b>145,840</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of 2021 Small Business Lending Assessment Area: St. Louis							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	125	9.8%	5.9%	\$16,498	7.9%	5.6%	6.5%
Moderate	303	23.9%	17.2%	\$44,359	21.3%	17.8%	18.1%
Middle	391	30.8%	31.2%	\$55,541	26.7%	29.2%	31.2%
Upper	447	35.2%	44.4%	\$91,089	43.8%	44.8%	43.1%
Unknown	4	0.3%	1.2%	\$550	0.3%	2.5%	1.1%
<b>TOTAL</b>	<b>1,270</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$208,037</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of 2022 Small Business Lending Assessment Area: St. Louis							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	103	16.6%	6.2%	\$19,496	11.8%	7.3%	7.1%
Moderate	71	11.5%	13.2%	\$16,019	9.7%	11.9%	14.6%
Middle	208	33.6%	35.0%	\$56,310	34.1%	32.7%	34.5%
Upper	228	36.8%	44.5%	\$70,900	42.9%	45.8%	42.8%
Unknown	9	1.5%	1.2%	\$2,555	1.5%	2.3%	1.0%
<b>TOTAL</b>	<b>619</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$165,280</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of 2021 Home Mortgage Lending Assessment Area: St. Louis								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner Occupied Units %
		#	# %	# %	\$	\$ %	\$ %	
Home Purchase	Low	9	3.6%	2.9%	1,352	2.1%	1.4%	4.8%
	Moderate	54	21.6%	16.2%	7,482	11.5%	9.9%	17.3%
	Middle	56	22.4%	38.4%	12,864	19.8%	33.3%	35.9%
	Upper	128	51.2%	42.3%	42,629	65.7%	55.1%	41.8%
	Unknown	3	1.2%	0.2%	535	0.8%	0.3%	0.2%
	<b>TOTAL</b>	<b>250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64,862</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	4	0.7%	1.0%	336	0.2%	0.5%	4.8%
	Moderate	62	11.3%	9.9%	8,102	5.8%	6.2%	17.3%
	Middle	185	33.8%	36.5%	33,311	23.9%	29.4%	35.9%
	Upper	295	53.9%	52.5%	97,134	69.8%	63.7%	41.8%
	Unknown	1	0.2%	0.1%	326	0.2%	0.1%	0.2%
	<b>TOTAL</b>	<b>547</b>	<b>100.0%</b>	<b>100.0%</b>	<b>139,209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	9.1%	1.7%	28	1.5%	1.4%	4.8%
	Moderate	3	27.3%	9.7%	388	20.5%	6.3%	17.3%
	Middle	3	27.3%	32.8%	655	34.6%	27.4%	35.9%
	Upper	4	36.4%	55.7%	820	43.4%	64.9%	41.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.2%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,891</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans	Low	4	14.3%	15.7%	4,655	24.4%	5.3%	12.3%
	Moderate	12	42.9%	30.5%	5,868	30.8%	21.5%	20.1%
	Middle	6	21.4%	35.1%	5,479	28.8%	28.3%	34.1%
	Upper	5	17.9%	17.3%	2,732	14.3%	43.2%	32.5%
	Unknown	1	3.6%	1.4%	305	1.6%	1.7%	1.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19,039</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total	Low	18	2.2%	1.8%	6,371	2.8%	1.1%	4.8%
	Moderate	131	15.7%	12.3%	21,840	9.7%	8.3%	17.3%
	Middle	250	29.9%	37.0%	52,309	23.2%	30.8%	35.9%
	Upper	432	51.7%	48.7%	143,315	63.7%	59.5%	41.8%
	Unknown	5	0.6%	0.2%	1,166	0.5%	0.2%	0.2%
	<b>TOTAL</b>	<b>836</b>	<b>100.0%</b>	<b>100.0%</b>	<b>225,001</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: St. Louis								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner Occupied Units %
		#	# %	# %	\$	\$ %	\$ %	
Home Purchase	Low	19	7.5%	3.8%	2,182	3.1%	2.0%	4.5%
	Moderate	53	21.0%	15.8%	7,549	10.7%	9.2%	15.0%
	Middle	88	34.9%	40.6%	19,972	28.4%	35.2%	38.3%
	Upper	91	36.1%	39.5%	40,397	57.4%	53.4%	42.1%
	Unknown	1	0.4%	0.2%	302	0.4%	0.2%	0.2%
	<b>TOTAL</b>	<b>252</b>	<b>100.0%</b>	<b>100.0%</b>	<b>70,402</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	4	4.7%	2.8%	538	1.9%	1.6%	4.5%
	Moderate	4	4.7%	13.1%	554	2.0%	7.7%	15.0%
	Middle	40	46.5%	40.4%	9,495	34.0%	33.0%	38.3%
	Upper	38	44.2%	43.5%	17,307	62.0%	57.5%	42.1%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.2%
	<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27,894</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.5%	0	0.0%	0.8%	4.5%
	Moderate	5	22.7%	8.2%	484	23.2%	5.7%	15.0%
	Middle	11	50.0%	34.8%	1,292	61.9%	28.1%	38.3%
	Upper	6	27.3%	55.4%	310	14.9%	65.3%	42.1%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.2%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,086</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans	Low	2	9.5%	12.9%	1,324	2.9%	10.1%	10.2%
	Moderate	4	19.0%	29.0%	1,643	3.6%	12.3%	17.8%
	Middle	10	47.6%	34.8%	33,285	73.2%	44.1%	39.4%
	Upper	5	23.8%	21.6%	9,206	20.3%	32.3%	30.5%
	Unknown	0	0.0%	1.7%	0	0.0%	1.2%	2.0%
	<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45,458</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total	Low	25	6.6%	3.3%	4,044	2.8%	2.7%	4.5%
	Moderate	66	17.3%	14.2%	10,230	7.0%	9.0%	15.0%
	Middle	149	39.1%	39.8%	64,044	43.9%	35.1%	38.3%
	Upper	140	36.7%	42.5%	67,220	46.1%	52.9%	42.1%
	Unknown	1	0.3%	0.2%	302	0.2%	0.3%	0.2%
	<b>TOTAL</b>	<b>381</b>	<b>100.0%</b>	<b>100.0%</b>	<b>145,840</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## APPENDIX C – GLOSSARY

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

**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.