

PUBLIC DISCLOSURE

January 21, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Dieterich Bank
RSSD #771140**

**300 Sur Woods Drive
Effingham, Illinois 62401**

Federal Reserve Bank of St. Louis

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

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

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

The Lending Test is rated:

Satisfactory

The Community Development Test is rated:

Satisfactory

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

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

During the COVID-19 pandemic, the bank responded to the needs of the community through its participation in the CARES Act¹ Paycheck Protection Program (PPP). The bank’s participation in the PPP was also considered in the bank’s rating.

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) Intermediate Small Bank Procedures. The Intermediate Small Bank Examination Procedures entail two performance tests: the Lending Test and the Community Development Test. Bank performance under these tests is rated at the institution level.

The bank maintains operations in three delineated AAs within the state of Illinois. The primary AA is located within a nonMSA portion of south central Illinois and is composed of Effingham,

¹ Coronavirus Aid, Relief, and Economic Security Act, signed into law on March 27, 2020.

Fayette, and Jasper counties in their entirety. The second AA is located within the Illinois portion of the St. Louis, Missouri-Illinois metropolitan statistical area (MSA) and is composed of Clinton, Madison, Monroe, and St. Clair counties in their entirety. The third AA is located within a nonMSA portion of southern Illinois and is composed of Randolph County in its entirety.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each AA completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2024.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	\$ (000s)	%	
South Central Illinois	7	46.7	767,577	61.0	Full Scope
St. Louis	5	33.3	239,380	19.0	Full Scope
Randolph County	3	20.0	257,017	20.0	Limited Scope
TOTAL²	15	100.0	1,263,974	100.0	2 – Full Scope

In light of branch structure, loan and deposit activity, and the bank's CRA evaluation history, CRA performance in the South Central and St. Louis AAs were given primary consideration, as they contain the majority of the bank's branch and loan activity. Therefore, the South Central and St. Louis AAs were reviewed using full-scope examination procedures, and performance in the Randolph County AA was reviewed using limited-scope procedures.

Furthermore, small business and residential real estate (RRE) loans, as reported under the Home Mortgage Disclosure Act (HMDA), were used to evaluate the bank's lending performance, as these loan categories are considered the bank's core business lines based on lending volume and the bank's stated business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of the bank's overall lending performance. However, as the bank has a particular emphasis on small business lending, performance based on the small business loan category carried the most significance toward the bank's overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	June 30, 2021 – December 31, 2024
Assessment Area Concentration	January 1, 2023 – December 31, 2023
Loan Distribution by Borrower's Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	April 19, 2021 – January 20, 2025
Community Development Activities	

² Note: In this table and others throughout this document, percentages may not total 100.0 percent due to rounding.

Lending Test analyses often entail comparisons of bank performance to AA demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, AA demographics are based on 2020 American Community Survey (ACS) data, and certain business demographics are based on 2023 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$592.3 million to \$931.0 million as of December 31, 2024.

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

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

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

To augment this evaluation, two community contact interviews were conducted with members of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank's AAs. Information from these interviews also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the AA in which they were conducted.

DESCRIPTION OF INSTITUTION

Dieterich Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Prime Banc Corp., a one-bank holding company. The bank and its holding company are both headquartered in Effingham, Illinois. The bank's branch network consists of 15 branches (including the main office), all of which have automated teller machines (ATMs) on site. Two of the bank's branches utilize deposit-accepting interactive teller machines; all other on-site ATMs are cash dispensing only. The bank also operates one stand-alone, cash-dispensing-only ATM. Additionally, all but the main office have drive-up accessibility. During the review period, the bank opened one branch and closed another branch in the St. Louis AA. In addition, the bank operates one commercial loan production office in Missouri. Based on this branch network and other service delivery systems, such as extended banking hours of operation and full-service online banking capabilities, the bank is well positioned to deliver financial services to the entirety of its AAs.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its AAs based on its available resources and financial products. As of December 31, 2024, the bank reported total assets of \$1.4 billion. As of the same date, loans and leases outstanding were \$854.1 million (62.9 percent of total assets), and deposits totaled \$1.2 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of December 31, 2024		
Credit Category	Amount \$ (000s)	Percentage of Total Loans
Commercial Real Estate	368,690	43.2
1–4 Family Residential	125,343	14.7
Commercial and Industrial	112,973	13.2
Multifamily Residential	65,250	7.6
Construction and Development	64,298	7.5
Farmland	64,136	7.5
Farm Loans	26,404	3.1
Total Other Loans	14,822	1.7
Loans to Individuals	12,222	1.4
TOTAL	854,138	100.0

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

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on April 19, 2021.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 15-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size \$ (000s) as of December 31, 2024	Average LTD Ratio (%)
Dieterich Bank	Effingham, Illinois	1,358,488	66.1
Regional Banks	Pana, Illinois	592,329	74.9
	Waterloo, Illinois	931,031	65.3
	Hillsboro, Illinois	620,966	66.4

Based on data from the previous table, the bank's level of lending is below one of its peer banks in the region and similarly aligned with the others. During the review period, the bank's quarterly LTD ratio experienced a generally increasing trend, with a 15-quarter average of 66.1 percent. In comparison, the average LTD ratios for the regional peers saw similar trends. Therefore, compared to data from regional banks, the bank's average LTD ratio is reasonable, given the bank's size, financial condition, and credit needs of its AAs.

Assessment Area Concentration

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

Lending Inside and Outside the Assessment Areas January 1, 2023, through December 31, 2023								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
Small Business	57	67.9	9,388	60.8	27	32.1	6,043	39.2
HMDA	193	75.1	32,033	50.4	64	24.9	31,554	49.6
TOTAL LOANS	250	73.3	41,421	52.4	91	26.7	37,597	47.6

A majority of loans and other lending-related activities were made in the bank's AAs. As shown above, 73.3 percent of the total loans were made inside the AAs, accounting for 52.4 percent of the dollar volume of total loans.

Borrower and Geographic Distribution

Overall, performance by borrower's income/revenue profile is reasonable, based on the analyses of lending in the bank's two full-scope AAs, as displayed in the following table.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
South Central Illinois	Reasonable
St. Louis	Reasonable
OVERALL	REASONABLE

Limited-Scope Assessment Area	Loan Distribution by Borrower's Profile
Randolph County	Consistent

Overall, the bank's distribution of lending by income level of census tract reflects reasonable penetration throughout the bank's two full-scope AAs, as displayed in the following table.

Full-Scope Assessment Areas	Geographic Distribution of Loans
South Central Illinois	Reasonable
St. Louis	Reasonable
OVERALL	REASONABLE

Limited-Scope Assessment Area	Geographic Distribution of Loans
Randolph County	Consistent

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (April 19, 2021, through January 20, 2025).

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated satisfactory. Considering the bank's capacity and the need and availability of such opportunities for community development in the AAs, the bank demonstrates adequate responsiveness to the community development needs of its AAs.

Full-Scope Assessment Areas	Community Development Test Performance Conclusions
South Central Illinois	Adequate
St. Louis	Adequate
OVERALL	ADEQUATE

Limited-Scope Assessment Area	Community Development Test Performance Conclusions
Randolph County	Consistent

During the review period, the bank made 17 qualifying community development loans in its AAs totaling approximately \$4.4 million. Of the 17 qualifying loans, 10 were PPP loans throughout LMI census tracts in the AAs totaling \$339,034. Of the remaining 7 qualifying loans, 4 were for affordable housing, 2 were for economic development, and 1 for a community service.

The bank also made community development investments and donations in its AAs totaling approximately \$3.0 million. This amount included 7 new qualified investments totaling \$2.2 million, 3 continuing investments made in a prior review period totaling \$721,000, and 60 donations totaling \$75,429. Most of the investments were municipal bonds issued by qualifying school districts for community services. Furthermore, the 62 donations were to 32 separate organizations having a community development purpose.

During the review period, bank personnel used financial expertise to log service activities to 10 different community development organizations within the bank's AAs. Service activities included delivering financial education in schools that primarily serve LMI families, providing financial expertise to community service organizations as board members, and offering financial expertise through income tax preparation.

In addition to adequately meeting the community development needs of its AAs, the bank had \$7.5 million in community development investments supporting affordable housing outside its AAs but still within the broader statewide Illinois 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.

SOUTH CENTRAL ILLINOIS NONMETROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTH CENTRAL ILLINOIS ASSESSMENT AREA

Bank Structure

The bank operates 7 of its 15 offices (46.7 percent) in this AA, including its home office. Of the six branch offices, three are located in middle-income census tracts, and the other three are located in upper-income census tracts. Since the last evaluation, the bank did not open or close any branches in this AA. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the AA.

General Demographics

The AA is composed of Effingham, Jasper, and Fayette counties in their entireties. This AA is located in central Illinois and is considered the bank's primary AA. Based on 2020 ACS data, the AA population was 65,443. Of the 19 FDIC-insured depository institutions with a branch presence in this AA, the bank ranked second in deposit market share, encompassing 20.1 percent of total AA deposit dollars.

Credit needs in the AA include a mix of consumer and business loan products. Another particular credit need in the AA, as noted primarily from a community contact, is affordable housing. The contact noted that there was a limited supply of houses for sale in the area and that the current real estate construction was for higher-end residences.

Income and Wealth Demographics

The following table summarizes the distribution of AA census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	0	2	12	4	0	18
	0.0%	11.1%	66.7%	22.2%	0.0%	100.0%
Family Population	0	1,443	10,447	5,226	0	17,156
	0.0%	8.4%	60.9%	30.7%	0.0%	100.0%

As shown above, there are no low-income census tracts. However, 11.1 percent of the census tracts in the AA are moderate-income geographies, with 8.4 percent of the family population residing in those tracts.

Based on 2020 ACS data, the median family income for the AA was \$69,445. At the same time, the median family income for nonMSA Illinois was \$68,958. More recently, the FFIEC estimates the 2023 median family income for nonMSA Illinois to be \$82,300. The following table displays population percentages of AA families by income level compared to nonMSA Illinois and the Illinois population as a whole.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	3,415	2,938	3,669	7,134	17,156
	19.9%	17.1%	21.4%	41.6%	100.0%
NonMSA Illinois	75,470	68,589	82,448	150,566	377,073
	20.0%	18.2%	21.9%	39.9%	100.0%
Illinois	696,043	532,206	621,096	1,267,070	3,116,415
	22.3%	17.1%	19.9%	40.1%	100.0%

As shown in the table above, 37.0 percent of families within the AA are considered LMI, which is similar to the percentage of LMI families in all nonMSA areas in Illinois (38.2 percent). Likewise, the percentage of families living below the poverty level in the AA (9.5 percent) is similar to the percentage of families living below the poverty level in nonMSA Illinois (9.5 percent). Considering these factors, the AA income levels appear to be consistent with nonMSA Illinois as a whole.

Housing Demographics

Based on housing values, income levels, and rental costs, housing in the AA appears to be more affordable than in nonMSA Illinois overall.

Housing Cost Burden (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	60.0	11.2	29.6	55.8	10.5	14.0
NonMSA Illinois	65.9	19.0	35.6	52.9	18.5	14.0
Illinois	73.6	34.6	41.8	67.0	34.3	20.8
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i>						

According to the table above, LMI renters in the AA are less cost burdened compared to LMI renters across nonMSA Illinois. This is supported by the AA having a lower median rental rate (\$634/month) compared to nonMSA Illinois as a whole (\$678/month). The table also shows that

more low-income homeowners in the AA are cost burdened, while fewer moderate-income homeowners are cost burdened in the AA than in nonMSA Illinois as a whole.

Industry and Employment Demographics

The AA supports a large and diverse business community, including a strong small business sector, as evidenced by the Dun & Bradstreet data indicating that 87.9 percent of AA businesses have gross annual revenues of \$1 million or less. Furthermore, according to the U.S. Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages data, there are 26,931 employees in the AA (including 716 governmental employees). By percentage of nongovernmental employees, the largest job categories in the AA are healthcare and social assistance (15.2 percent), retail trade (14.6 percent), manufacturing (13.5 percent), and accommodation and food services (13.1 percent). The table below details BLS unemployment data (not seasonally adjusted) for the AA.

Unemployment Levels (%)				
Dataset	Time Period (Annual Average)			
	2021	2022	2023	2024 (Jan.–July)
Assessment Area	4.4	3.6	3.8	4.6
Effingham County	4.0	3.1	3.2	4.1
Fayette County	5.3	4.5	4.9	5.6
Jasper County	4.3	3.9	4.0	4.9
NonMSA Illinois	5.2	4.4	4.6	5.2
Illinois	6.1	4.6	4.5	5.3

As shown in the table above, unemployment levels varied greatly among the individual counties within the AA. Unemployment rates were consistently lower in Effingham County than in Fayette and Jasper counties. However, all counties saw a decline from 2021 to 2022 before rising in 2023 and continuing in 2024 (YTD). Overall, unemployment rates in the AA trended lower than those in nonMSA Illinois as a whole.

Community Contact Information

For the AA, one community contact interview was completed and referred to as part of this evaluation. The interviewee was an economic development representative in the AA.

The community contact categorized the local economy as doing great in certain parts of the AA, particularly those with larger cities, while noting that areas with smaller towns are not doing as well. Most major employers have grown but have been stifled by a lack of employees. The AA is becoming more demographically diverse, but the population is not growing, in part due to a shortage of housing. Per the community contact, there is a need for housing at all price points. The low supply of housing stock coupled with the high demand has increased the housing burden for everyone.

One other particular opportunity for banks, as noted by the community contact, is small business development. There is a lack of resources for new small business owners.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTH
CENTRAL ILLINOIS ASSESSMENT AREA**

LENDING TEST

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

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from both loan categories reviewed. The bank's lending distribution to small businesses is reasonable, while HMDA loan distribution by borrower's profile is poor. Greater significance is placed on performance in the small business loan category given the bank's emphasis on small business lending.

Small business loans were reviewed to determine the bank's lending levels to businesses of different revenue sizes. The following table shows the distribution of 2023 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: South Central Illinois									
Business Revenue and Loan Size			2023						
			Count			Dollars			Total Businesses
						Bank	Aggregate	Bank	
			#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	23	74.2	48.4	1,924	45.4	26.6	87.9	
	Over \$1 Million/ Unknown	8	25.8	51.6	2,318	54.6	73.4	12.1	
	TOTAL	31	100.0	100.0	4,242	100.0	100.0	100.0	
Loan Size	\$100,000 or Less	19	61.3	90.5	816	19.2	28.9		
	\$100,001– \$250,000	7	22.6	4.9	1,097	25.9	18.9		
	\$250,001– \$1 Million	5	16.1	4.6	2,329	54.9	52.1		
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0		
	TOTAL	31	100.0	100.0	4,242	100.0	100.0		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	16	69.6		671	34.9		
		\$100,001– \$250,000	6	26.1		978	50.8		
		\$250,001– \$1 Million	1	4.3		275	14.3		
		Over \$1 Million	0	0.0		0	0.0		
		TOTAL	23	100.0		1,924	100.0		

The bank's level of lending to small businesses is reasonable. The bank originated the majority of its small business loans (74.2 percent) to businesses with revenues of \$1 million or less. In comparison, AA demographics estimate that 87.9 percent of businesses in the AA had annual revenues of \$1 million or less, and the 2023 aggregate lending level to small businesses is 48.4 percent.

HMDA loans were also reviewed to determine the bank's lending levels to individuals of different income levels. Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$82,300 for nonMSA Illinois as of 2023). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the AA. Additionally, 2023 aggregate data for the AA is displayed.

Borrower Distribution of HMDA Loans Assessment Area: South Central Illinois								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	8	9.3	12.1	721	4.3	5.1	19.9
	Moderate	10	11.6	20.7	1,225	7.3	15.3	17.1
	Middle	27	31.4	24.3	4,887	29.3	23.7	21.4
	Upper	35	40.7	24.1	9,242	55.4	39.3	41.6
	Unknown	6	7.0	18.8	620	3.7	16.6	0.0
	TOTAL	86	100.0	100.0	16,695	100.0	100.0	100.0
Refinance	Low	0	0.0	6.3	0	0.0	2.3	19.9
	Moderate	2	11.8	20.3	195	12.0	13.0	17.1
	Middle	6	35.3	26.6	626	38.7	26.7	21.4
	Upper	9	52.9	42.2	798	49.3	53.5	41.6
	Unknown	0	0.0	4.7	0	0.0	4.5	0.0
	TOTAL	17	100.0	100.0	1,619	100.0	100.0	100.0
Home Improvement	Low	0	0.0	4.9	0	0.0	1.5	19.9
	Moderate	0	0.0	9.8	0	0.0	12.1	17.1
	Middle	2	13.3	24.4	100	8.8	17.4	21.4
	Upper	9	60.0	48.8	648	57.0	51.6	41.6
	Unknown	4	26.7	12.2	389	34.2	17.4	0.0
	TOTAL	15	100.0	100.0	1,137	100.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	N/A
	Moderate	0	0.0	0.0	0	0.0	0.0	N/A
	Middle	0	0.0	0.0	0	0.0	0.0	N/A
	Upper	0	0.0	0.0	0	0.0	0.0	N/A
	Unknown	0	0.0	100.0	0	0.0	100.0	N/A
	TOTAL	0	0.0	100.0	0	0.0	100.0	N/A
HMDA TOTALS	Low	8	6.8	10.9	721	3.7	5.0	19.9
	Moderate	12	10.2	18.9	1,420	7.3	14.0	17.1
	Middle	35	29.7	24.4	5,613	28.9	22.9	21.4
	Upper	53	44.9	30.2	10,688	54.9	41.0	41.6
	Unknown	10	8.5	15.7	1,009	5.2	17.2	0.0
	TOTAL	118	100.0	100.0	19,451	100.0	100.0	100.0

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (6.8 percent) is substantially below the low-income family population figure (19.9 percent) and below the 2023 aggregate lending level to low-income borrowers (10.9 percent), reflecting poor

performance. Similarly, the bank's level of lending to moderate-income borrowers (10.2 percent) is significantly below the moderate-income family population percentage (17.1 percent) and the 2023 aggregate lending level to moderate-income borrowers (18.9 percent), reflecting poor performance. Therefore, considering performance in both income categories, the bank's overall distribution of loans by borrower's profile is poor.

Geographic Distribution of Loans

As noted previously, the AA does not include any low-income census tracts and has only two moderate-income census tracts, representing 11.1 percent of all AA census tracts. Overall, the bank's geographic distribution of loans in this AA reflects reasonable penetration throughout the moderate-income census tracts, based on the small business and HMDA loan categories. Furthermore, based on reviews from both loan categories, the bank had loan activity in 83.3 percent of all AA census tracts, and there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank's overall geographic distribution of loans is reasonable.

The following table displays 2023 small business loan activity by geography income level compared to the location of businesses throughout the bank's AA and 2023 small business aggregate data.

Geographic Distribution of Small Business Loans Assessment Area: South Central Illinois							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	3.2	7.3	95	2.2	3.7	7.5
Middle	13	41.9	58.8	1,704	40.2	60.9	63.6
Upper	17	54.8	32.7	2,442	57.6	35.1	28.9
Unknown	0	0.0	1.2	0	0.0	0.3	0.0
TOTAL	31	100.0	100.0	4,241	100.0	100.0	100.0

The bank's percentage of loans in the AA's two moderate-income census tracts (3.2 percent) is similar to the 2023 aggregate lending levels in moderate-income census tracts (7.3 percent) and the percentage of small businesses operating inside these tracts (7.5 percent). Taking into consideration the distance of the bank's branches to the moderate-income census tracts, the bank's performance is reasonable.

Next, the bank's geographic distribution of HMDA loans was reviewed. The following table displays the geographic distribution of 2023 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the AA.

Geographic Distribution of HMDA Loans Assessment Area: South Central Illinois								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	15.7	0	0.0	12.7	9.0
	Middle	39	45.3	55.4	5,650	33.8	48.1	59.9
	Upper	47	54.7	29.0	11,045	66.2	39.2	31.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	86	100.0	100.0	16,695	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	16.4	0	0.0	20.3	9.0
	Middle	10	58.8	57.0	710	43.9	53.0	59.9
	Upper	7	41.2	26.6	909	56.1	26.7	31.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	17	100.0	100.0	1,619	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	4.9	0	0.0	6.3	9.0
	Middle	7	46.7	56.1	442	38.9	41.1	59.9
	Upper	8	53.3	39.0	695	61.1	52.6	31.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	15	100.0	100.0	1,137	100.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	4.4
	Middle	0	0.0	50.0	0	0.0	5.0	67.0
	Upper	0	0.0	50.0	0	0.0	95.0	28.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
HMDA TOTALS	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	14.2	0	0.0	13.0	9.0
	Middle	56	47.5	55.8	6,802	35.0	46.7	59.9
	Upper	62	52.5	30.0	12,649	65.0	40.3	31.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	118	100.0	100.0	19,451	100.0	100.0	100.0

The bank did not originate any loans in the moderate-income census tracts, while the percentage of owner-occupied housing units in moderate-income census tracts is 9.0 percent, and the

aggregate level is 14.2 percent. Therefore, the analysis of HMDA loans revealed poor lending performance to borrowers residing in moderate-income geographies.

COMMUNITY DEVELOPMENT TEST

The bank's overall community development performance demonstrates adequate responsiveness to community development needs within the AA, considering the bank's capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank extended two community development loans totaling \$1.4 million in this AA. Of the two qualifying loans, one was a PPP loan for \$3,015 and the other was a loan made to the Village of Dieterich to support the buyout of low-income residents' homes that were continually impacted by flooding despite not being located in a flood zone.

The bank made \$1.5 million in investments, supporting economic development, community services, and affordable housing. Additionally, the bank made 30 donations totaling \$47,012 in this AA. Bank personnel also used their financial expertise to provide services to three different community organizations in this AA.

ST. LOUIS, MISSOURI-ILLINOIS METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

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

Bank Structure

The bank operates 5 of its 15 offices (33.3 percent) in this AA. Of the five offices, three are located in middle-income census tracts, and the other two are located in upper-income census tracts. Since the last evaluation, the bank closed one branch in St. Clair County and opened one branch in Monroe County. Based on its branch network and other service delivery systems, the bank is reasonably well positioned to deliver financial services to substantially all of the AA.

General Demographics

The AA is composed of Clinton, Madison, Monroe, and St. Clair counties in their entireties. This AA is located within the Illinois portion of the St. Louis, Missouri-Illinois MSA. Based on 2020 ACS data, the AA population was 595,120. Of the 42 FDIC-insured depository institutions with a branch presence in this AA, the bank ranked 17 in deposit market share, encompassing 1.7 percent of total AA deposit dollars.

Credit needs in the AA include a mix of consumer and business loan products. Other credit needs in the AA, as noted primarily from one of the community contacts, are affordable housing, home improvement loans, and business start-up loans.

Income and Wealth Demographics

The following table summarizes the distribution of AA census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	19	39	60	28	1	147
	12.9%	26.5%	40.8%	19.0%	0.7%	100.0%
Family Population	11,567	31,466	71,459	41,882	551	156,925
	7.4%	20.1%	45.5%	26.7%	0.4%	100.0%

As shown above, 39.4 percent of the census tracts in the AA are LMI geographies, but only 27.5 percent of the family population resides in these census tracts. These LMI areas are primarily concentrated in and around St. Clair and Madison counties.

Based on 2020 ACS data, the median family income for the AA was \$80,162. At the same time, the median family income for the St. Louis, Missouri-Illinois MSA and the state of Illinois was \$84,758 and \$86,251, respectively. More recently, the FFIEC estimates the 2023 median family income for the entire St. Louis, Missouri-Illinois MSA to be \$100,800. The following table displays population percentages of AA families by income level compared to the St. Louis, Missouri-Illinois MSA and the state of Illinois family population percentages.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	36,001	28,025	33,598	59,301	156,925
	22.9%	17.9%	21.4%	37.8%	100.0%
St. Louis, Missouri-Illinois MSA	150,414	129,743	152,753	291,483	724,393
	20.8%	17.9%	21.1%	40.2%	100.0%
Illinois	696,043	532,206	621,096	1,267,070	3,116,415
	22.3%	17.1%	19.9%	40.7%	100.0%

As shown in the table above, 40.8 percent of families within the AA are considered LMI, which is above the LMI family percentages of 38.7 percent in the St. Louis, Missouri-Illinois MSA and 39.4 percent in the state of Illinois. The percentage of families living below the poverty level in the AA, 8.5 percent, is above the 7.3 percent level in the St. Louis, Missouri-Illinois MSA but is consistent with the poverty level of 8.5 percent in the state of Illinois. Considering these factors, the AA income levels appear to be slightly less affluent than those of the St. Louis, Missouri-Illinois MSA and the state of Illinois.

Housing Demographics

Based on housing values, income levels, and rental costs, housing in the AA appears to be more affordable than in the state of Illinois as a whole.

Housing Cost Burden (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	72.5	20.9	42.1	58.8	23.1	16.0
St. Louis, Missouri-Illinois MSA	75.2	25.8	40.8	61.0	26.9	16.4
Illinois	73.6	34.6	41.8	67.0	34.3	20.8
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i>						

According to the table above, a smaller percentage of LMI renters are cost burdened in the AA compared to those in the entire St. Louis, Missouri-Illinois MSA and the state as a whole. This is further supported by the AA having a lower median rental rate (\$856/month) compared to the St. Louis, Missouri-Illinois MSA (\$913/month) and the state of Illinois (\$1,038/month). Similarly, the table shows that LMI homeowners in the AA are less cost burdened than those in the St. Louis, Missouri-Illinois MSA and the state as a whole. This is supported by the fact that the AA has a lower median housing value (\$143,115) than the MSA (\$179,231) and the state as a whole (\$202,100).

A community contact stated that not all cities in the AA are equal and suggested that many underserved members of the community cannot afford to replace roofs or do maintenance for their homes. The community contact added that a bank that provides low-cost home renovation loan products would be a significant benefit to the area.

Industry and Employment Demographics

The AA supports a large and diverse business community, including a strong small business sector, as evidenced by the Dun & Bradstreet data indicating that 90.7 percent of AA businesses have gross annual revenues of \$1 million or less. Furthermore, according to the BLS Quarterly Census of Employment and Wages data, there are 196,202 employees in the AA (including 21,204 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the AA are healthcare and social assistance (16.7 percent), retail trade (14.9 percent), and accommodation and food services (13.2 percent). The table below details BLS unemployment data (not seasonally adjusted).

Unemployment Levels (%)				
Dataset	Time Period (Annual Average)			
	2021	2022	2023	2024 (Jan.–July)
Assessment Area	5.3	4.1	4.2	4.8
St. Louis, Missouri-Illinois MSA	4.4	2.9	3.2	4.0
Illinois	6.1	4.6	4.5	5.3

As shown in the table above, unemployment rates in the AA; the St. Louis, Missouri-Illinois MSA; and Illinois followed mostly similar trends, with rates declining from 2021 to 2022 before rising in 2023 and 2024 (YTD). Overall, unemployment rates in the AA were generally lower than those in Illinois as a whole.

Community Contact Information

For the AA, one community contact interview was completed and referenced as part of this evaluation. The interview was with an individual from an organization specializing in housing and economic development.

The community contact characterized the local economy as “booming,” with very high construction volumes in the enterprise zones and low unemployment rates. However, the economic growth is driven primarily by certain areas. For example, areas such as Edwardsville, Collinsville, and Highland are expanding economically, and the population is following suit, whereas other places, such as Granite City, Pontoon Beach, and Wood River, have experienced some major industry loss, such as a local steel mill leaving, which impacted those respective populations. As a result, the contact mentioned that the housing stock is aging in the areas of the AA that were declining economically.

The community contact also noted the specific needs of the AA as affordable housing and childcare and described the business environment as not being small business friendly. The contact stated that most development projects are large commercial and industrial projects, which results in limited funding or options for small business owners unless they have collateral. However, there is an abundance of personal banking options. Banks are abundant and very visible in the community.

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

LENDING TEST

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

Loan Distribution by Borrower's Profile

The bank's loan distribution by borrower income/revenue profile is reasonable, based on performance from both loan categories. First, small business loans were reviewed to determine the bank's lending levels to businesses of different revenue sizes. The following table shows the distribution of 2023 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: St. Louis								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	10	52.6	57.5	2,602	64.2	32.9	90.7
	Over \$1 Million/ Unknown	9	47.4	42.5	1,453	35.8	67.1	9.3
	TOTAL	19	100.0	100.0	4,055	100.0	100.0	100.0
Loan Size	\$100,000 or Less	8	42.1	91.6	256	6.3	31.6	
	\$100,001– \$250,000	4	21.1	4.0	744	18.3	15.5	
	\$250,001– \$1 Million	7	36.8	4.4	3,055	75.3	52.9	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	19	100.0	100.0	4,055	100.0	100.0	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	4	40.0		101	3.9	
		\$100,001– \$250,000	1	10.0		240	9.2	
		\$250,001– \$1 Million	5	50.0		2,261	86.9	
		Over \$1 Million	0	0.0		0	0.0	
		TOTAL	10	100.0		2,602	100.0	

The bank's level of lending to small businesses is reasonable. The bank originated 52.6 percent of its small business loans to businesses with revenues of \$1 million or less. In comparison, AA demographics estimated that 90.7 percent of businesses in the AA had annual revenues of \$1 million or less, and the 2023 aggregate lending level to small businesses is 57.5 percent.

HMDA loans were also reviewed to determine the bank's lending levels to individuals of different income levels. Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$100,800 for the St. Louis, Missouri-Illinois MSA as of 2023). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the AA. Additionally, 2023 aggregate data for the AA is displayed.

Borrower Distribution of HMDA Loans Assessment Area: St. Louis								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	3	18.8	15.6	401	16.4	7.4	22.9
	Moderate	3	18.8	23.5	482	19.8	17.2	17.9
	Middle	4	25.0	19.1	581	23.8	20.3	21.4
	Upper	3	18.8	22.7	574	23.5	35.6	37.8
	Unknown	3	18.8	19.0	401	16.4	19.4	0.0
	TOTAL	16	100.0	100.0	2,439	100.0	100.0	100.0
Refinance	Low	2	22.2	15.0	218	20.4	8.4	22.9
	Moderate	2	22.2	20.7	400	37.4	16.1	17.9
	Middle	1	11.1	22.6	25	2.3	21.3	21.4
	Upper	0	0.0	28.4	0	0.0	37.4	37.8
	Unknown	4	44.4	13.3	427	39.9	16.8	0.0
	TOTAL	9	100.0	100.0	1,070	100.0	100.0	100.0
Home Improvement	Low	0	0.0	10.2	0	0.0	5.9	22.9
	Moderate	1	100.0	16.0	30	100.0	12.5	17.9
	Middle	0	0.0	25.1	0	0.0	23.2	21.4
	Upper	0	0.0	43.0	0	0.0	51.2	37.8
	Unknown	0	0.0	5.6	0	0.0	7.2	0.0
	TOTAL	1	100.0	100.0	30	100.0	100.0	100.0
Multifamily	Low	0	0.0	1.0	0	0.0	0.2	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	3.8	0	0.0	2.5	N/A
	Unknown	7	100.0	95.2	5,237	100.0	97.3	N/A
	TOTAL	7	100.0	100.0	5,237	100.0	100.0	N/A
HMDA TOTALS	Low	5	15.2	14.6	619	7.1	7.2	22.9
	Moderate	6	18.2	21.8	912	10.4	16.1	17.9
	Middle	5	15.2	20.2	606	6.9	19.6	21.4
	Upper	3	9.1	26.1	574	6.5	35.2	37.8
	Unknown	14	42.4	17.4	6,065	69.1	21.9	0.0
	TOTAL	33	100.0	100.0	8,776	100.0	100.0	100.0

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (15.2 percent) is below the low-income family population figure (22.9 percent) but slightly above the 2023 aggregate lending level to low-income borrowers (14.6 percent), reflecting reasonable

performance. The bank's level of lending to moderate-income borrowers (18.2 percent) is above the moderate-income family population percentage (17.9 percent) but below the 2023 aggregate lending level to moderate-income borrowers (21.8 percent), reflecting reasonable performance. Therefore, considering performance in both income categories, the bank's overall distribution of loans by borrower's profile is reasonable.

Geographic Distribution of Loans

As noted previously, the AA includes 19 low-income and 39 moderate-income census tracts, representing 39.4 percent of all AA census tracts. Overall, the bank's geographic distribution of loans in this AA reflects reasonable penetration throughout these LMI census tracts, based on the small business and HMDA loan categories. This conclusion is influenced by several factors. First, performance in the small business loan category carried the most significance in the overall conclusion. Next, based on reviews from both loan categories, the bank had loan activity in 19.7 percent of all AA census tracts and 13.8 percent of LMI census tracts. Additionally, the bank only holds 1.7 percent of the deposit market share in the AA. Lastly, four of the five branches in the AA are in Monroe and Clinton counties, which are not located near most of the LMI census tracts in the AA. Considering these factors, no conspicuous lending gaps were noted in LMI areas, and the bank's overall geographic distribution of loans is reasonable.

Geographic Distribution of Small Business Loans Assessment Area: St. Louis							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0	3.8	0	0.0	4.1	6.0
Moderate	6	31.6	18.5	888	21.9	22.6	21.2
Middle	4	21.1	47.2	705	17.4	46.0	47.3
Upper	9	47.4	29.6	2,463	60.7	26.3	24.7
Unknown	0	0.0	0.9	0	0.0	0.9	0.8
TOTAL	19	100.0	100.0	4,056	100.0	100.0	100.0

The bank's percentage of loans in moderate-income census tracts (31.6 percent) is above the percentage of small businesses in moderate-income census tracts (21.2 percent) and the 2023 aggregate lending percentage in moderate-income census tracts (18.5 percent), representing excellent performance. The bank's lending in low-income census tracts is reasonable, given that demographics and aggregate lending are very low. Therefore, the bank's overall geographic distribution of small business loans is reasonable.

Next, the bank's geographic distribution of HMDA loans was reviewed. The following table displays the geographic distribution of 2023 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the AA.

Geographic Distribution of HMDA Loans Assessment Area: St. Louis								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	2.5	0	0.0	1.0	5.2
	Moderate	1	6.3	20.7	84	3.4	12.1	20.6
	Middle	9	56.3	49.7	1,551	63.6	47.7	46.6
	Upper	6	37.5	26.9	804	33.0	39.1	27.3
	Unknown	0	0.0	0.2	0	0.0	0.1	0.4
	TOTAL	16	100.0	100.0	2,439	100.0	100.0	100.0
Refinance	Low	1	11.1	1.7	50	4.7	0.7	5.2
	Moderate	1	11.1	18.5	145	13.6	11.5	20.6
	Middle	5	55.6	49.4	503	47.0	49.0	46.6
	Upper	2	22.2	30.2	372	34.8	38.7	27.3
	Unknown	0	0.0	0.2	0	0.0	0.1	0.4
	TOTAL	9	100.0	100.0	1,070	100.0	100.0	100.0
Home Improvement	Low	0	0.0	1.9	0	0.0	1.2	5.2
	Moderate	0	0.0	11.0	0	0.0	8.4	20.6
	Middle	0	0.0	49.4	0	0.0	46.4	46.6
	Upper	1	100.0	37.4	30	100.0	43.8	27.3
	Unknown	0	0.0	0.3	0	0.0	0.2	0.4
	TOTAL	1	100.0	100.0	30	100.0	100.0	100.0
Multifamily	Low	0	0.0	2.9	0	0.0	1.2	18.6
	Moderate	2	28.6	31.7	1,911	36.5	31.8	20.9
	Middle	4	57.1	49.0	3,002	57.3	53.8	43.2
	Upper	1	14.3	16.3	324	6.2	13.2	16.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.7
	TOTAL	7	100.0	100.0	5,237	100.0	100.0	100.0
HMDA TOTALS	Low	1	3.0	2.3	50	0.6	1.0	5.2
	Moderate	4	12.1	19.3	2,140	24.4	12.8	20.6
	Middle	18	54.5	49.4	5,056	57.6	48.1	46.6
	Upper	10	30.3	28.7	1,530	17.4	38.1	27.3
	Unknown	0	0.0	0.2	0	0.0	0.1	0.4
	TOTAL	33	100.0	100.0	8,776	100.0	100.0	100.0

The analysis of HMDA loans revealed reasonable lending performance to borrowers residing in low-income geographies. The bank's total penetration of low-income census tracts by number of

loans (3.0 percent) is below the percentage of owner-occupied housing units in low-income census tracts (5.2 percent) but slightly above performance of other lenders in the AA (2.3 percent).

Bank performance in moderate-income census tracts was significantly below comparison data and deemed poor. The bank's total penetration of moderate-income census tracts by number of loans (12.1 percent) is below the percentage of owner-occupied housing units in moderate-income census tracts (20.6 percent) and aggregate performance (19.3 percent). Combined, the bank's geographic distribution of HMDA loans in LMI geographies is poor.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates adequate responsiveness to community development needs within this AA, considering the bank's capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank made 14 community development loans totaling \$2.7 million. Of the 14 qualifying loans, 9 were PPP loans in LMI geographies totaling \$336,019. The bank also made one new investment totaling \$1.0 million, which was in the form of bonds for affordable housing. Additionally, the bank made 18 donations totaling \$22,917. Finally, bank personnel used their financial expertise to provide services to six different community development organizations.

RANDOLPH COUNTY NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RANDOLPH COUNTY ASSESSMENT AREA

This AA includes the entirety of Randolph County, and the bank operates three offices in this AA. There have not been any branches opened or closed in this AA since the last evaluation. The tables below detail key demographics relating to this AA.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	1,472	1,386	1,734	3,283	7,875
	18.7%	17.6%	22.0%	41.7%	100.0%
Household Population	2,774	1,794	2,249	5,230	12,047
	23.0%	14.9%	18.7%	43.4%	100.0%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	0	9	1	0	10
	0.0%	0.0%	90.0%	10.0%	0.0%	100.0%
Family Population	0	0	7,692	183	0	7,875
	0.0%	0.0%	97.7%	2.3%	0.0%	100.0%
Household Population	0	0	11,793	254	0	12,047
	0.0%	0.0%	97.9%	2.1%	0.0%	100.0%
Business Institutions	0	0	975	21	0	996
	0.0%	0.0%	97.9%	2.1%	0.0%	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RANDOLPH COUNTY ASSESSMENT AREA**LENDING TEST**

The bank's Lending Test performance in this AA is consistent with the bank's Lending Test performance in the South Central Illinois and St. Louis AAs that were reviewed using full-scope procedures, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this AA, see the tables in *Appendix B*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
OVERALL	Consistent

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this AA is consistent with the bank's Community Development Test performance in the South Central Illinois and St. Louis AAs that were reviewed using full-scope procedures.

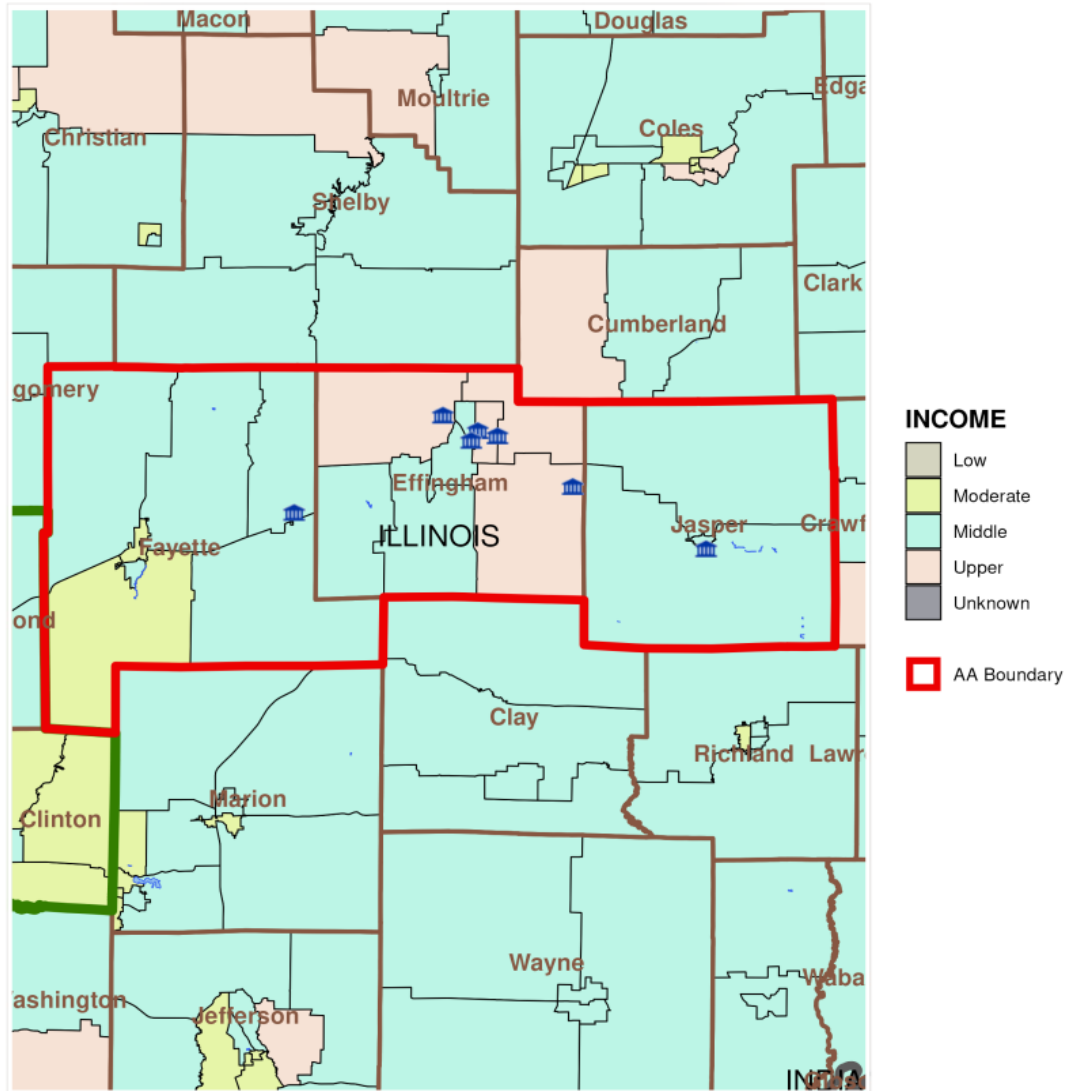
During the review period, the bank made one community development loan totaling \$289,599 to an organization that provides affordable housing in the AA. Additionally, the bank made investments totaling \$328,000 in school bonds and affordable housing. The bank also made 12 donations totaling \$5,500, and bank personnel used financial expertise to provide services to a community development organization in this AA.

APPENDIX A – MAPS OF ASSESSMENT AREAS

South Central Illinois

Dieterich Bank

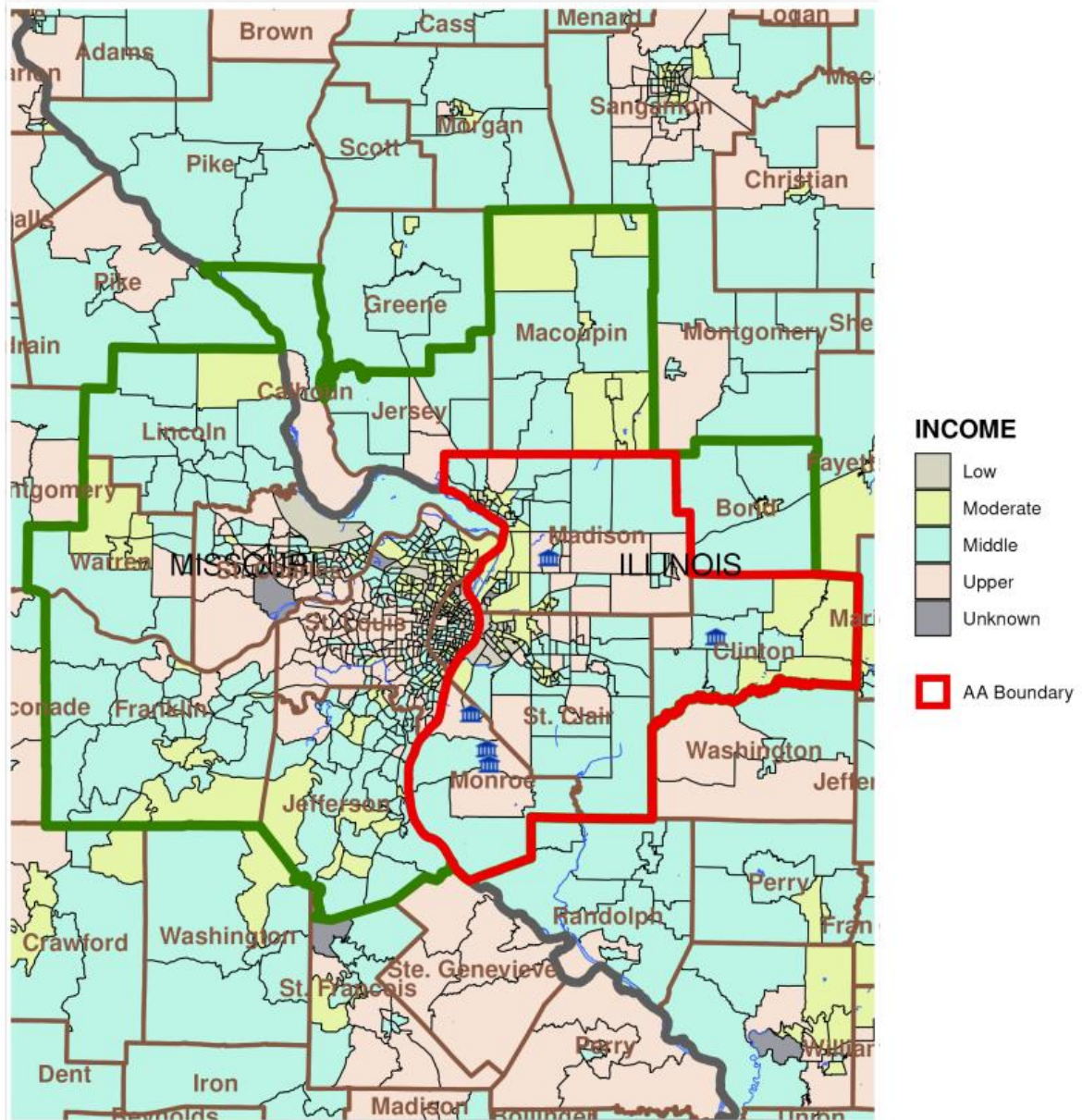
Effingham NonMSA IL 2023 - Tract Income



St. Louis

Dieterich Bank

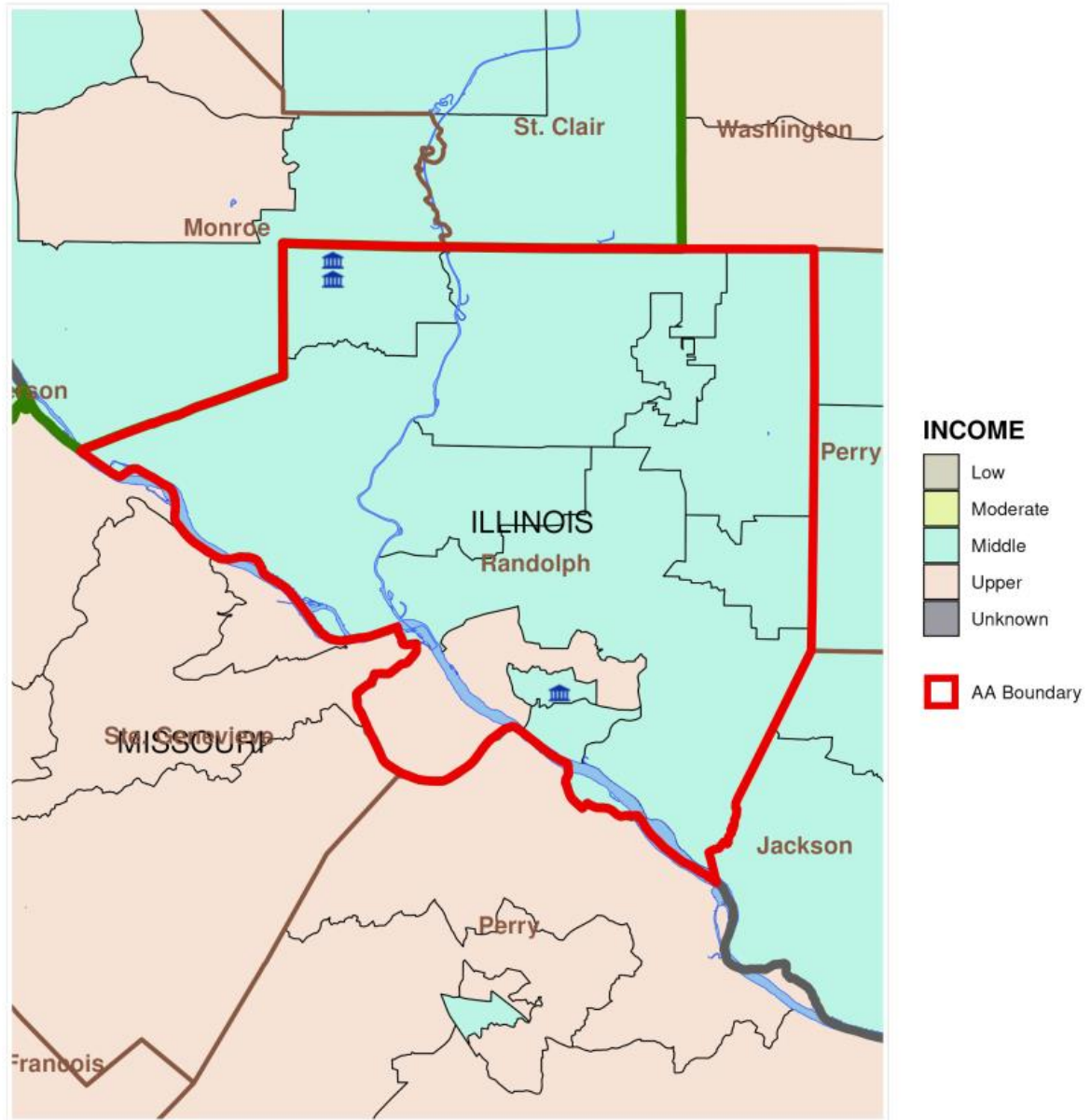
St. Louis, MO-IL partial MSA 2023 - Tract Income



Randolph County

Dieterich Bank

Randolph County NonMSA IL 2023 - Tract Income



**APPENDIX B – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE
REVIEW ASSESSMENT AREAS**

Randolph County Assessment Area

Small Business Loans by Revenue and Loan Size Assessment Area: Randolph County								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	5	71.4	52.7	766	70.2	33.4	88.1
	Over \$1 Million/ Unknown	2	28.6	47.3	325	29.8	66.6	11.9
	TOTAL	7	100.0	100.0	1,091	100.0	100.0	100.0
Loan Size	\$100,000 or Less	3	42.9	89.6	75	6.9	24.2	
	\$100,001– \$250,000	3	42.9	8.0	516	47.3	29.9	
	\$250,001– \$1 Million	1	14.3	2.5	500	45.8	45.9	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	7	100.0	100.0	1,091	100.0	100.0	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	60.0		75	9.8	
		\$100,001– \$250,000	1	20.0		191	24.9	
		\$250,001– \$1 Million	1	20.0		500	65.3	
		Over \$1 Million	0	0.0		0	0.0	
		TOTAL	5	100.0		766	100.0	

Borrower Distribution of HMDA Loans Assessment Area: Randolph County								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	1	14.3	17.6	56	4.7	10.5	18.7
	Moderate	0	0.0	31.1	0	0.0	25.2	17.6
	Middle	0	0.0	24.7	0	0.0	25.9	22.0
	Upper	4	57.1	16.1	984	82.9	28.1	41.7
	Unknown	2	28.6	10.5	147	12.4	10.3	0.0
	TOTAL	7	100.0	100.0	1,187	100.0	100.0	100.0
Refinance	Low	5	41.7	21.0	237	44.5	11.7	18.7
	Moderate	4	33.3	22.2	143	26.9	16.7	17.6
	Middle	1	8.3	23.5	30	5.6	19.9	22.0
	Upper	2	16.7	24.7	122	22.9	40.0	41.7
	Unknown	0	0.0	8.6	0	0.0	11.7	0.0
	TOTAL	12	100.0	100.0	532	100.0	100.0	100.0
Home Improvement	Low	0	0.0	2.9	0	0.0	4.0	18.7
	Moderate	0	0.0	22.9	0	0.0	14.5	17.6
	Middle	0	0.0	20.0	0	0.0	19.2	22.0
	Upper	0	0.0	54.3	0	0.0	62.3	41.7
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily	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	50.0	0	0.0	23.3	N/A
	Unknown	0	0.0	50.0	0	0.0	76.7	N/A
	TOTAL	0	0.0	100.0	0	0.0	100.0	N/A
HMDA TOTALS	Low	6	31.6	16.3	293	17.0	10.0	18.7
	Moderate	4	21.1	28.2	143	8.3	23.0	17.6
	Middle	1	5.3	23.8	30	1.7	23.3	22.0
	Upper	6	31.6	22.3	1,106	64.3	31.9	41.7
	Unknown	2	10.5	9.5	147	8.6	11.8	0.0
	TOTAL	19	100.0	100.0	1,719	100.0	100.0	100.0

Geographic Distribution of Small Business Loans Assessment Area: Randolph County							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	7	100.0	96.5	1,091	100.0	99.3	97.9
Upper	0	0.0	2.5	0	0.0	0.4	2.1
Unknown	0	0.0	1.0	0	0.0	0.2	0.0
TOTAL	7	100.0	100.0	1,091	100.0	100.0	100.0

Geographic Distribution of HMDA Loans Assessment Area: Randolph County								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner- Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	7	100.0	99.3	1,187	100.0	98.5	97.8
	Upper	0	0.0	0.7	0	0.0	1.5	2.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	7	100.0	100.0	1,187	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	12	100.0	100.0	532	100.0	100.0	97.8
	Upper	0	0.0	0.0	0	0.0	0.0	2.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	12	100.0	100.0	532	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	97.1	0	0.0	97.3	97.8
	Upper	0	0.0	2.9	0	0.0	2.7	2.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	50.0	0	0.0	76.7	94.4
	Upper	0	0.0	50.0	0	0.0	23.3	5.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
HMDA TOTALS	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	19	100.0	99.0	1,719	100.0	98.3	97.8
	Upper	0	0.0	1.0	0	0.0	1.7	2.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	19	100.0	100.0	1,719	100.0	100.0	100.0

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/AA.

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.