PUBLIC DISCLOSURE

July 27, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

First Bank Hampton
RSSD# 786948

211 First Avenue Northwest
Hampton, Iowa 50441

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

- The bank's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- An excellent distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Chicago (Reserve Bank) have received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, aggregate lending data, and credit needs. Lending performance was assessed within the bank's only AA**.**

In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units by census tract income level for home mortgage lending, the percentage of businesses by census tract income level for small business lending, and the percentage of farms by census tract income level for small farm lending. In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses and farms of different revenue sizes, the demographic figure refers to the percentage of families by income level for home mortgage lending, the percentage of businesses in the AA with revenues of $1 million or less for small business lending, and the percentage of farms in the AA with revenues of $1 million or less for small farm lending.

Examiners reviewed the following data:

- Loan-to-Deposit Ratio - The bank's 16-quarter average LTD ratio ending March 31, 2026, was calculated for the bank and compared to a sample of local competitors.

- Lending in the Assessment Area - A sample of the bank's total lending activity, consisting of 110 small business, 78 small farm, and 59 home mortgage loans, originated between January 1, 2025, to December 31, 2025, were reviewed to determine the percentage of loans originated in the assessment area.

- Geographic Distribution of Lending in the Assessment Area – The 61 small farm, 54 small business, and 34 home mortgage loans from the sample that were originated in the assessment area from January 1, 2025, to December 31, 2025, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels. Given the bank's loan portfolio, small farm and small business lending received greater weight in the analysis.

- Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes – The bank's 61 small farm, 54 small business, and 34 home mortgage loans that were originated in the assessment area, from January 1, 2025, to December 31, 2025, were analyzed to determine the distribution among individuals of different income levels, including low- and moderate-income, and businesses and farms of different revenue sizes. Given the bank's loan portfolio, small farm and small business lending received greater weight in the analysis.

- Response to Substantiated Complaints – Complaints were reviewed to determine if any were related to the bank's record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness. Neither the bank nor the Federal Reserve Bank of Chicago received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

First Bank Hampton is a community bank headquartered in Hampton, Iowa. The bank's characteristics include the following.

- The bank is a wholly owned subsidiary of A.M. Saylor Inc.
- The bank has total assets of $252.6 million as of March 31, 2026.
- In addition to its main office in Hampton, Iowa, the bank has one additional branch office located in Latimer, Iowa.
- The main branch in Hampton, Iowa operates a full-service automated teller machine (ATM) and the Latimer, Iowa location operates a cash-only ATM.
- The institution's branch network and delivery systems provide consumers with access to banking services throughout its assessment area.
- As shown in the table below, the bank's primary business focuses are commercial, agricultural, and residential real estate lending, which together comprise the majority of the loan portfolio (92.9 percent).

Table 1

Composition of Loan Portfolio as of March 31, 2026		
Loan Type	**$(000)**	**%**
Commercial	76,768	38.0
Agricultural	74,819	37.0
Residential Real Estate	36,224	17.9
Consumer	12,544	6.2
Other Loans	1,800	1.0
Gross Loans	202,155	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its June 27, 2022, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank's Non-MSA Iowa AA consists solely of Franklin County, Iowa in its entirety (see Appendix A for additional demographic data).

- The assessment area's geographic delineation has remained unchanged since the previous evaluation.
- The assessment area consists of one moderate-income census tract and two underserved, middle-income census tracts. Based on updates from the 2020 Decennial Census and the 2016-2020 American Community Survey (ACS) since the previous evaluation, one middle-income census tract is now designated as a moderate-income census tract. Additionally, since the previous evaluation, the bank's middle-income census tracts are now designated as underserved based on their remote rural location.
- According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2025, First Bank Hampton ranked first of five FDIC-insured financial institutions operating within the AA. The bank held $214.5 million in deposits, representing 47.7 percent of the total deposit market share.
- A community representative was contacted to better understand the credit needs of the assessment area related to economic development and affordable housing. The representative leads a government agency that partners with local governments to develop local economies and help low- and moderate-income populations maintain their housing. They also noted the area is experiencing a lack of newly constructed housing, as well as a lack of renovated housing, resulting in a continually aging housing stock. The representative also highlighted that the area's business environment is generally stable, with no significant closures or expansions. The representative did, however, indicate that business owners in the area are hesitating to invest more due to sustained market uncertainty. Challenges relating to median family

income, as well as retaining the area's young adult population remain. While the representative indicated improvement could be made, especially in regard to financing home improvement loans, they did not identify instances of significantly unmet banking needs within the area.

Table 2

Population Change Assessment Area: Non-MSA Iowa			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Assessment Area	10,489	10,019	-4.5
Non-MSA Iowa	1,250,756	1,232,642	-1.4
State of Iowa	3,093,526	3,190,369	3.1
Source: 2020 U.S. Census Bureau: Decennial Census *2011-2015 U.S. Census Bureau: American Community Survey*			

- As reflected in Table 2, according to the U.S. Census Bureau, the assessment area's population is 10,019 as of 2020, which represents a decline of 4.5 percent from 2015.
- The broader Non-MSA Iowa experienced a smaller decline of 1.4 percent, while the state of Iowa experienced an increase of 3.1 percent.
- A community representative indicated the population loss in Franklin County may be overstated due to the potential undercounting of the immigrant population based on how the 2020 census was conducted. The representative noted the increase of the immigrant population has fortified the overall community, specifically within the labor market, from some of the adverse effects of its younger population relocating to pursue more lucrative economic opportunities.

Table 3

Median Family Income Change Assessment Area: Non-MSA Iowa			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Assessment Area	64,064	61,971	-3.3
Non-MSA Iowa	67,391	71,763	6.5
State of Iowa	73,712	79,186	7.4
Source: 2011-2015 U.S. Census Bureau: American Community Survey *2016-2020 U.S. Census Bureau: American Community Survey* *Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

- According to the U.S. Census Bureau, the assessment area is comprised of 2,858 families, of which 24.7 percent are designated as low-income, 20.6 percent as moderate-income, 23.0 percent as middle-income, and 31.7 percent as upper-income families.
- Additionally, 13.4 percent of families residing within the assessment area live below the poverty line, which is above both the broader Non-MSA Iowa's and the state of Iowa's poverty rates of 7.7 percent and 7.1 percent, respectively.

- As reflected in Table 3, the assessment area experienced a 3.3 percent decline in the median family income between 2015 and 2020.
- A community representative explained that local income varies heavily based on changes to agricultural crop prices with recent tariffs putting additional pressure on local income.

Table 4

Housing Cost Burden Assessment Area: Non-MSA Iowa						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	69.0	0.0	27.9	31.8	13.8	10.4
Non-MSA Iowa	65.3	17.4	33.2	55.4	19.3	14.5
State of Iowa	71.9	21.9	38.3	59.3	23.8	15.2

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2018-2022 Comprehensive Housing Affordability Strategy

- There is a total of 4,846 housing units within the AA. The majority of the housing units are owner-occupied at 61.0 percent, whereas rental units account for 25.6 percent of total units. Further, 13.4 percent of housing units are vacant, which is slightly higher than the percentage of the vacant units within the state of Iowa at 9.5 percent.
- As reflected in Table 4, low-income renters and owners are experiencing significant housing cost burden in the AA, with 69.0 percent of renter and 31.8 percent of owner households paying more than 30 percent of their income on housing. However, low-income housing cost burden for owners within the assessment area is significantly lower than both the non-MSA Iowa and the state of Iowa.
- Low-income renters within the AA are experiencing similar trends to renters within the state of Iowa, while low-income owners in the AA are experiencing significantly lower rates of housing cost burden compared to the state.
- A community representative explained that rural Iowa typically has higher housing cost burden due to lower property values when compared to urban Iowa, and the rest of the country.
- According to U.S. Census data, the median value of owner-occupied housing units from 2020-2024 in Franklin County was $124,100. By comparison, the statewide median value was $208,000 during the same timeframe, while the national median was $332,700.

Table 5

Unemployment Rates Assessment Area: Non-MSA Iowa					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	4.3	3.9	3.0	3.2	3.1
Non-MSA Iowa	4.9	3.8	3.0	3.0	3.0
State of Iowa	5.2	3.9	2.8	2.9	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Based on the U.S. Bureau of Labor Statistics data, the AA has consistent unemployment rates with the entire Non-MSA Iowa and the state of Iowa.
- According to the U.S. Bureau of Labor Statistics, manufacturing, government, retail trade, management of companies and enterprises, and construction have the largest number of employees in the AA. Agriculture, forestry, fishing and hunting, government, retail trade, healthcare and social assistance, wholesale trade, and construction have the largest number of establishments in the AA.
- A community representative stated that the area is currently experiencing a labor shortage with more job openings available than qualified workers to fill them. The representative noted efforts are currently underway to help alleviate the situation. This includes a new career education center to help train high school students in high-demand areas, such as healthcare, construction, and other trades, and ultimately connects them with small businesses operating in the area.

Table 6

Home Mortgage Loan Trends Assessment Area: Non-MSA Iowa					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	102	144	99	51	59
Non-MSA Iowa	30,708	29,961	19,107	14,211	15,044
State of Iowa	127,798	123,573	72,004	49,890	52,700
Source: FFIEC Home Mortgage Disclosure Act Aggregate Data					

- Based on the FFIEC Home Mortgage Disclosure Act (HMDA) Aggregate Data referenced in Table 6, HMDA reporters within the AA originated 59 home mortgage loans in 2024.
- From 2020 to 2023, home mortgage loan originations within the AA declined significantly by 50.0 percent but slightly increased by 15.7 percent from 2023 to 2024.
- From 2020 to 2023, the entire Non-MSA Iowa and the state of Iowa also experienced significant declines in home mortgage loan originations at 53.7 percent and 61.0 percent, respectively. Both areas showed modest increases from 2023 to 2024.
- A community representative indicated home mortgage lending within the area declined due to the higher interest rate environment. Additionally, the representative noted the greatest challenge the assessment area faces is the

gap between the cost of building or renovating properties and what they can be sold for when completed. A minimal profit margin disincentivizes developers from constructing new or renovating existing properties. Additionally, slow growth in home prices has resulted in reduced incentives for existing homeowners to sell, further restricting the available housing supply for low and moderate-income households trying to purchase their own home.

Table 7

Small Business Loan Trends Assessment Area: Non-MSA Iowa					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	62	95	104	105	70
Non-MSA Iowa	14,408	21,815	17,188	15,653	15,775
State of Iowa	44,000	57,918	50,220	45,630	47,152
Source: FFIEC CRA Aggregate Data					

- Based on the FFIEC CRA Aggregated Data and referenced in Table 7, lenders originated 70 small business loans within the AA in 2024.
- From 2020 to 2023, small business loans originated within the AA significantly increased by 69.4 percent, while small business loan originations in the state of Iowa increased by 3.7 percent during the same period. From 2023 to 2024, the AA experienced a 33.3 percent decline in small business loan originations, while the state of Iowa experienced a 3.3 percent increase.
- A community representative shared that the area's recent decline in small business lending is attributed to the higher interest rate environment, as fewer businesses are able to afford the higher cost of debt.

Table 8

Small Farm Loan Trends Assessment Area: Non-MSA Iowa					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	65	79	107	102	86
Non-MSA Iowa	10,446	13,637	12,216	11,582	11,120
State of Iowa	14,193	18,681	16,567	15,676	15,040
Source: FFIEC CRA Aggregate Data					

- Based on the FFIEC CRA Aggregate Data, lenders originated 86 small farm loans within the AA in 2024.
- From 2020 to 2024, small farm loan originations within the assessment area increased significantly by 32.3 percent.
- From 2020 to 2024, the entire Non-MSA Iowa and the state of Iowa saw modest growth in small farm loan originations during that same time, with increases of 6.5 percent and 6.0 percent, respectively.
- A community representative shared that similar to small businesses, the area's recent decline in small farm lending is attributed to the higher interest rate environment, as fewer farms are able to afford the higher cost of debt. The

representative added that the tariffs implemented in 2024 added additional pressure to small farms in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall Lending Test performance is Satisfactory. Overall, the bank is meeting the credit needs of its assessment area based on an analysis of the bank's lending activities. The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area needs. When combined, a majority of the bank's home mortgage, small business, and small farm loans were originated in the assessment area. The geographic distribution of loans reflects excellent distribution throughout the assessment area, and lending activities reflect reasonable penetration among individuals of different income levels, and among businesses and farms of different sizes. Given the bank's loan portfolio composition, small farm and small business lending received greater weight in the analysis. Additionally, neither First Bank Hampton nor the Federal Reserve Bank of Chicago have received any CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

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

First Bank Hampton's LTD ratio is reasonable. As of March 31, 2026, the LTD ratio averaged 85.4 percent over a 16-quarter period. The ratio was below the highest ratio from a peer institution and significantly above the remaining peer institution's LTD ratios. The bank's LTD ratio increased slightly since the previous evaluation when the bank had an average loan-to-deposit ratio of 78.8 percent over an 18-quarter period.

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

Table 9

Comparative LTD Ratios June 30, 2022 – March 31, 2026			
Institution	**Location**	**Asset Size $(000)**	**LTD Ratio (%) 16 Quarter Average**
First Bank Hampton	**Hampton, Iowa**	**252,571**	**85.4**
Similarly Situated Institutions			
Green Belt Bank & Trust Company	Iowa Falls, Iowa	771,964	92.5
First Security Bank and Trust Company	Charles City, Iowa	549,785	70.8
United Bank and Trust Company	Hampton, Iowa	227,647	59.6

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans, by number and dollar, inside the AA. Within the sample of 247 loans originated during the evaluation period, the bank originated 60.3 percent of total loans by number and 52.1 percent by dollar amount inside the AA. When evaluating loans by type and number, the bank originated 57.6 percent of home mortgage loans and 78.2 percent of small farm loans inside the AA. However, less than a majority of the bank's small business loans, 49.1 percent by number and 28.9 percent by dollar, were made within the bank's AA, with the remaining made in counties neighboring the bank's AA (Franklin County). Of the small business loans made outside of the bank's AA, many were made within Butler County, a neighboring county directly to the east of Franklin County. During the evaluation, it was discovered that a peer institution in Butler County had closed, which increased demand for banking products in that area, particularly commercial loan products. Given this performance context, the concentration of lending within the AA indicates the bank is actively serving the credit needs of its local community.

The following table summarizes the bank's lending inside and outside its AA for samples of home mortgage, small business, and small farm loans originated from January 1, 2025, to December 31, 2025.

Table 10

Lending Inside and Outside the Assessment Area								
Loan Type	**Inside**				**Outside**			
	#	**#%**	**$(000)**	**$%**	**#**	**#%**	**$(000)**	**$%**
Home Mortgage	34	57.6	2,930	46.7	25	42.4	3,337	53.3
Small Business	54	49.1	2,332	28.9	56	50.9	5,740	71.1
Small Farm	61	78.2	6,189	81.0	17	21.8	1,453	19.0
Total Loans	149	60.3	11,450	52.1	98	39.7	10,530	47.9
Note: Percentages may not total 100.0 percent due to rounding.								

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of home mortgage lending in moderate-income tracts was above aggregate lending data and above the demographic figure. The bank originated 55.9 percent of its home mortgage loans in the assessment area's sole moderate-income census tract, compared to 48.3 percent by aggregate lenders and 43.3 percent of the assessment area's owner-occupied housing units located within the moderate-income census tract. The bank's main office, which originates a majority of the bank's home mortgage loans, is located within the moderate-income census tract. The bank's home mortgage loans were well dispersed within the assessment area, and no unexplained or conspicuous lending gaps were identified.

The following table presents the bank's geographic distribution of home mortgage loans originated within the bank's AA.

Table 11

Distribution of 2025 Home Mortgage Lending by Income Level of Geography
Assessment Area: Non-MSA Iowa

Geographic Income Level	Bank and Aggregate Loans						Owner-Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	19	55.9	48.3	1,362	46.5	44.0	43.3
Middle	15	44.1	51.7	1,568	53.5	56.0	56.7
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	2,930	100.0	100.0	100.0

Source: 2025 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is excellent. The distribution of small business lending in moderate-income tracts was above the demographic figure. The bank originated 57.4 percent of its small business loans in the assessment area's sole moderate-income census tract, compared to 42.4 percent of the assessment area's

total businesses located within the moderate-income census tract. The bank's small business loans were well dispersed within the assessment area, and no unexplained or conspicuous lending gaps were identified.

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

Table 12

Distribution of 2025 Small Business Lending By Income Level of Geography Assessment Area: IA Non MSA					
Geographic Income Level	**Bank Loans**				**Total Businesses %**
	#	**#%**	**$(000)**	**$%**	
Low	0	0.0	0	0.0	0.0
Moderate	31	57.4	1,349	57.8	42.4
Middle	23	42.6	983	42.2	57.6
Upper	0	0.0	0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	54	100.0	2,332	100.0	100.0

Source: 2025 FFIEC Census Data
2025 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The geographic distribution of small farm lending is reasonable. The distribution of small farm lending in moderate-income tracts was comparable to the demographic figure. The bank originated 16.4 percent of its small farm loans within the assessment area's sole moderate-income census tract, compared to 14.5 percent of the assessment area's total small farms operating within the moderate-income census tract. The bank's small farm loans were well dispersed within the assessment area, and no unexplained or conspicuous lending gaps were identified.

The following table presents the bank's geographic distribution of small farm loans originated within the bank's AA.

Table 13

Distribution of 2025 Small Farm Lending By Income Level of Geography Assessment Area: IA Non MSA					
Geographic Income Level	**Bank Loans**				**Total Farms %**
	#	**#%**	**$(000)**	**$%**	
Low	0	0.0	0	0.0	0.0
Moderate	10	16.4	716	11.6	14.5
Middle	51	83.6	5,473	88.4	85.5
Upper	0	0.0	0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	61	100.0	6,189	100.0	100.0

Source: 2025 FFIEC Census Data
2025 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Borrower Distribution of Loans

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different sizes. The bank's lending has a reasonable distribution among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers is above aggregate lending data and comparable to the demographic figure. The distribution of home mortgage lending to moderate-income borrowers is below aggregate lending data and comparable to the demographic figure. The bank originated 23.5 percent of its home mortgage loans to low-income borrowers, compared to 9.0 percent of aggregate of lenders and 24.7 percent of low-income families in the assessment area. The bank originated 20.6 percent of its home mortgage loans to moderate-income borrowers, compared to 25.8 percent of aggregate lenders and 20.6 percent of moderate-income families in the assessment area. Overall, 44.1 percent of the bank's home mortgage loans within the assessment area were made to low or moderate-income borrowers, compared to 34.8 percent aggregate and 45.3 percent of families.

The following table presents the borrower distribution of home mortgage loans originated within the bank's AA.

Table 14

Distribution of 2025 Home Mortgage Lending by Borrower Income Level Assessment Area: Non-MSA Iowa							
Borrower Income Level	**Bank and Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	8	23.5	9.0	424	14.5	4.6	24.7
Moderate	7	20.6	25.8	480	16.4	19.6	20.6
Middle	9	26.5	21.3	847	28.9	25.7	23.0
Upper	10	29.4	23.6	1,179	40.2	22.2	31.7
Unknown	0	0.0	20.2	0	0.0	27.9	0.0
Total	34	100.0	100.0	2,930	100.0	100.0	100.0

Source: 2025 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Small Business Lending

The borrower distribution of small business lending is reasonable. The distribution of small business lending to businesses with annual revenues of one million dollars or less was below the demographic figure. While the distribution of small business lending was below the demographic figure, the bank originated 79.6 percent of its small business loans to businesses with revenues of one million dollars or less, demonstrating its commitment to meeting the needs of small businesses in the area. Additionally, of the loans made to businesses with revenues of one million dollars or less, 95.3 percent were made in amounts of one hundred thousand dollars or less, which are considered most beneficial to small businesses and further demonstrate the bank's willingness to meet small business credit needs.

The following table presents the bank's borrower distribution of small business loans originated within the AA.

Table 15

Distribution of 2025 Small Business Lending By Revenue Size of Businesses Assessment Area: IA Non MSA					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	43	79.6	1,391	59.6	92.1
Over $1 Million	11	20.4	941	40.4	4.6
Revenue Unknown	0	0.0	0	0.0	3.3
Total	54	100.0	2,332	100.0	100.0
By Loan Size					
$100,000 or Less	49	90.7	1,504	64.5	
$100,001 - $250,000	5	9.3	828	35.5	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	54	100.0	2,332	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	41	95.3	990	71.2	
$100,001 - $250,000	2	4.7	400	28.8	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	43	100.0	1,390	100.0	

Source: 2025 FFIEC Census Data
2025 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The distribution of small farm lending to farms with annual revenues of one million dollars or less was below the demographic figure. However, 99.3 percent of all farms within the area have less than one million dollars or less in revenue. The bank originating 83.6 percent of its small farm loans to farms with one million or less in revenue indicates its commitment to serving the credit needs of such farms. Additionally, of the loans made to farms with revenues of one million dollars or less, 74.5 percent were made in amounts of one hundred thousand dollars or less, which are considered to be most beneficial to small farms, and further demonstrates the bank's willingness to meet the credit needs of small farms.

The following table presents the bank's distribution of small farm loans originated within the AA.

Table 16

Distribution of 2025 Small Farm Lending By Revenue Size of Farms Assessment Area: IA Non MSA					
	Bank Loans				Total Farms %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	51	83.6	4,311	69.7	99.3
Over $1 Million	10	16.4	1,878	30.3	0.7
Revenue Unknown	0	0.0	0	0.0	0.0
Total	61	100.0	6,189	100.0	100.0
By Loan Size					
$100,000 or Less	41	67.2	1,493	24.1	
$100,001 - $250,000	14	23.0	2,227	36.0	
$250,001 - $500,000	6	9.8	2,469	39.9	
Total	61	100.0	6,189	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	38	74.5	1,330	30.9	
$100,001 - $250,000	9	17.6	1,343	31.2	
$250,001 - $500,000	4	7.8	1,638	38.0	
Total	51	100.0	4,311	100.0	

Source: 2025 FFIEC Census Data
2025 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Response to Complaints

The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet the credit needs in its AA is appropriate.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – DEMOGRAPHIC INFORMATION
TABLE A-1 – Demographic Data

2025 IA Non-MSA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	705	24.7
Moderate	1	33.3	1,195	41.8	202	16.9	590	20.6
Middle	2	66.7	1,663	58.2	182	10.9	657	23.0
Upper	0	0.0	0	0.0	0	0.0	906	31.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**2,858**	**100.0**	**384**	**13.4**	**2,858**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	**#**	**% by unit**	**#**	**% by unit**
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,160	1,281	43.3	59.3	554	25.6	325	15.0
Middle	2,686	1,675	56.7	62.4	685	25.5	326	12.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**4,846**	**2,956**	**100.0**	**61.0**	**1,239**	**25.6**	**651**	**13.4**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	167	42.4	152	41.9	8	44.4	7	53.8
Middle	227	57.6	211	58.1	10	55.6	6	46.2
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**394**	**100.0**	**363**	**100.0**	**18**	**100.0**	**13**	**100.0**
Percentage of Total Businesses:				**92.1**		**4.6**		**3.3**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	21	14.5	21	14.6	0	0.0	0	0.0
Middle	124	85.5	123	85.4	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**145**	**100.0**	**144**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.3**		**0.7**		**0.0**

Source: 2025 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX B – GLOSSARY

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total

number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

Metropolitan Statistical Area (MSA): As defined by the Office of Management and Budget, an MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. These loans have original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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