PUBLIC DISCLOSURE

October 20, 2025

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

CBI Bank & Trust
RSSD# 830542

301 Iowa Avenue
Muscatine, Iowa 52761

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 CRA RATING

CBI Bank & Trust is rated: Outstanding
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

CBI Bank & Trust is meeting the credit needs of its community based on an analysis of lending and community development activities. The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and combined assessment area credit needs. A substantial majority of loans are originated in the combined assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the combined assessment area and lending reflects reasonable penetration among borrowers of different incomes and businesses and farms of different revenue sizes. Neither CBI Bank & Trust nor this Reserve Bank have received any CRA-related complaints since the previous examination.

CBI Bank & Trust's community development performance demonstrates excellent responsiveness to the community development needs of its combined assessment area through community development loans, qualified investments (including donations), and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities in the bank's combined assessment area.

SCOPE OF EXAMINATION

CBI Bank & Trust's CRA performance was evaluated using the Intermediate Small Institution Examination Procedures issued by the Federal Financial Institutions Examination Council (FFIEC). Performance was evaluated in the context of information about the institution and its assessment areas, including the bank's asset size, financial condition, competition, and economic and demographic characteristics. Lending activity for major product lines, which included HMDA-reportable, small business, and small farm loans, was reviewed as the basis for this evaluation with all products being weighted equally.

CBI Bank & Trust delineates seven assessment areas throughout the states of Iowa, Illinois and Wisconsin. This includes two assessment areas in the state of Iowa (Iowa Non-metropolitan statistical area (MSA) & Iowa City, IA MSA), three assessment areas in the state of Illinois (Illinois Non-MSA, Peoria, IL MSA, & Rockford, IL MSA), one assessment area in the state of Wisconsin (Janesville-Beloit, WI MSA), additionally the bank delineates one multi-state MSA assessment area (Davenport-Moline-Rock Island, IA-IL MSA). The combined delineated assessment area has expanded since the previous evaluation due to the acquisition of six SENB Bank branches. As a result, the Rockford, IL MSA and Janesville-Beloit, WI MSA have been added to the bank's combined assessment area.

The Iowa Non-MSA, Illinois Non-MSA, and the Davenport-Moline-Rock Island, IA-IL MSA assessment areas received full-scope reviews due to the volume of lending and the deposit market share in the assessment areas and the bank's physical presence of branches and automated teller machines (ATMs). Additionally, the Janesville-Beloit, WI MSA assessment area received a full-scope review as the sole assessment area in the state of Wisconsin, with examination procedures requiring a state rating and one-full scope assessment for each state where the bank maintains a deposit-taking office. The Iowa City, IA MSA, Peoria, IL MSA, and Rockford IL, MSA assessment areas received limited scope reviews due to limited deposit market shares and the branch and ATM network in the assessment area. Additional information that was considered in each assessment area review included deposit market share, percentage of low- and moderate-income families, and community credit needs. The Davenport-Moline-Rock Island, IA-IL MSA, Iowa Non-MSA, and Illinois Non-MSA assessment areas received equal weight with the Janesville-Beloit, WI MSA assessment area receiving considerably less weight than the other three full-scope assessment areas based on limited deposit market share and branching.

Performance within the designated assessment areas was evaluated using intermediate-small bank examination procedures based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 12-quarter average (September 30, 2022, to June 30, 2025) loan-to-deposit ratio was calculated for the bank and compared to a sample of local competitors.

- ***Lending in the Assessment Area*** –HMDA-reportable loans originated from January 1, 2023, to December 31, 2024, and a sample of small business and small farm loans originated from January 1, 2024, to December 31, 2024, were reviewed to determine the percentage of loans originated within the combined assessment area.

- ***Geographic Distribution of Lending in the Assessment Area*** –HMDA-reportable loans originated from January 1, 2023, to December 31, 2024, and a sample of small business and small farm loans originated from January 1, 2024, to December 31, 2024, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income. Due to acquisitions of six SENB Bank branches (October 2023), only 2024 HMDA-reportable loan data was considered in the Rockford, IL MSA, and Janesville-Beloit, WI MSA assessment areas.

- ***Lending to Borrowers of Different Income and to Businesses and Farms of Different Sizes*** – HMDA-reportable loans originated from January 1, 2023, to December 31, 2024, and a sample of small business and small farm loans originated from January 1, 2024, to December 31, 2024, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses and farms with different revenue sizes. Due to acquisitions of six SENB Bank branches (October 2023), only 2024 HMDA-reportable loan data was considered in the Rockford, IL MSA, and Janesville-Beloit, WI MSA assessment areas.

- ***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.

- ***Community Development Activities*** – The bank's responsiveness to community development needs through community development loans, qualified investments, and community development services from July 18, 2022, to October 20, 2025, were reviewed considering the capacity, need, and availability of such opportunities within the assessment areas. Due to the SENB Bank acquisition (October 2023), the review period for community development activities in the Rockford, IL MSA and Janesville-Beloit, WI MSA was from October 21, 2023, to October 20, 2025.

In addition, five community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the combined assessment area. The following types of organizations were contacted: affordable housing and economic development. Please refer to the individual assessment area summaries for community representative information.

DESCRIPTION OF ASSESSMENT AREAS

CBI Bank & Trust is an interstate bank that delineates seven assessment areas across the states of Iowa, Illinois, and Wisconsin. The combined assessment area consists of 371 census tracts of which 125 are designated as low- or moderate-income (24 low- and 101 moderate-income), representing 33.7 percent of all tracts in the combined assessment area. The low- and moderate-income census tracts include 88,245 families, representing 25.3 percent of all families in the combined assessment area. According to 2024 FFIEC Census Data, three census tracts within the Iowa Non-MSA Assessment Area (Louisa County) are designated underserved due to their remote and rural nature. Additionally, eleven census tracts within the Illinois Non-MSA Assessment Area (Knox County) are designated as distressed due to high levels of unemployment. As mentioned above, the combined delineated assessment area has expanded since the previous evaluation as a result of the SENB Bank branch acquisitions. The Rockford, IL MSA and Janesville-Beloit, WI MSA have been added to the bank's combined assessment area. Details on the bank's combined assessment area are included in the following table.

Scope	Assessment Area	Description (Full Counties)
Full	Iowa Non-MSA	Louisa & Muscatine Counties
Limited	Iowa City, IA MSA #26980	Johnson & Washington Counties
Full	Illinois Non-MSA	Knox & Warren Counties
Limited	Peoria, IL MSA #37900	Peoria & Tazewell Counties
Limited	Rockford, IL MSA #40420	Winnebago County
Full	Janesville-Beloit, WI MSA #27500	Rock County
Full	Davenport-Moline-Rock Island, IA-IL MSA #19340	Scott County (Iowa); Mercer & Rock Island Counties (Illinois)

The bank's combined assessment area includes 615,391 total housing units, of which 179,487 (29.2 percent) are in low- or moderate-income census tracts. Within the low-income tracts, 24.0 percent of housing units are owner-occupied, while 48.9 percent are owner-occupied in moderate-income tracts. This is indicative of opportunities for home ownership and lending within these tracts.

A total of 47,156 businesses are located in the combined assessment area, of which 13,008 (27.6 percent) are in low- or moderate-income census tracts. Businesses with gross annual revenues under $1.0 million represent 89.9 percent of total businesses, evidencing ample opportunities for small business lending within the combined assessment area.

A total of 2,198 farms are located in the combined assessment area, of which 186 (8.4 percent) are in low- or moderate-income census tracts. Farms with gross annual revenues under $1.0 million represent 98.4 percent of total farms; however, while the percentage of total farms with revenues of $1 million or less is a significant majority, opportunity for small lending in low- and moderate-income census tracts in the combined assessment area is limited.

Additional combined assessment area demographic information is provided in the following table. Refer to Appendix C for the 2023 combined assessment area demographic information.

2024 Combined AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	24	6.5	11,463	3.3	4,968	43.3	71,589	20.6
Moderate	101	27.2	76,782	22.0	12,098	15.8	64,505	18.5
Middle	166	44.7	169,476	48.7	11,963	7.1	74,135	21.3
Upper	75	20.2	89,674	25.7	2,854	3.2	138,040	39.6
Unknown	5	1.3	874	0.3	427	48.9	0	0.0
Total AA	**371**	**100.0**	**348,269**	**100.0**	**32,310**	**9.3**	**348,269**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	29,081	6,976	1.8	24.0	16,725	57.5	5,380	18.5
Moderate	150,406	73,594	19.4	48.9	60,604	40.3	16,208	10.8
Middle	295,232	196,105	51.7	66.4	74,800	25.3	24,327	8.2
Upper	136,248	101,935	26.9	74.8	26,180	19.2	8,133	6.0
Unknown	4,424	379	0.1	8.6	3,153	71.3	892	20.2
Total AA	**615,391**	**378,989**	**100.0**	**61.6**	**181,462**	**29.5**	**54,940**	**8.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,535	5.4	2,150	5.1	365	8.6	20	3.6
Moderate	10,473	22.2	9,345	22.0	1,036	24.5	92	16.6
Middle	21,213	45.0	19,182	45.3	1,718	40.7	313	56.6
Upper	11,971	25.4	10,882	25.7	975	23.1	114	20.6
Unknown	964	2.0	823	1.9	127	3.0	14	2.5
Total AA	**47,156**	**100.0**	**42,382**	**100.0**	**4,221**	**100.0**	**553**	**100.0**
Percentage of Total Businesses:				**89.9**		**9.0**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	0.2	5	0.2	0	0.0	0	0.0
Moderate	181	8.2	179	8.3	2	6.1	0	0.0
Middle	1,364	62.1	1,344	62.2	17	51.5	3	100.0
Upper	647	29.4	633	29.3	14	42.4	0	0.0
Unknown	1	0.0	1	0.0	0	0.0	0	0.0
Total AA	**2,198**	**100.0**	**2,162**	**100.0**	**33**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**98.4**		**1.5**		**0.1**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

DESCRIPTION OF INSTITUTION

CBI Bank & Trust, headquartered in Muscatine, Iowa, is a wholly owned subsidiary of Central Bancshares, Inc. with assets of $1.575 billion as of June 30, 2025. The bank operates its main office in Muscatine, Iowa, and has 23 branches and 28 cash-only ATMs. Through the SENB Bank (October 2023) and Farmers-Merchants Bank of Illinois branch (January 2024) acquisitions, the institution added seven branches and eight ATMs since the previous evaluation. Additionally, CBI Bank & Trust closed one cash-only ATM (November 2023) in an upper-income tract located in Edwards, Illinois, within the Peoria, IL MSA assessment area.

CBI Bank & Trust is primarily a commercial lender as commercial loans represent approximately 53.9 percent of the loan portfolio, followed by residential real estate and agricultural loans at 21.7 percent and 19.0 percent, respectively. The bank offers a range of retail banking services that are available to the communities it serves. Loan products are standard and generally non-complex and include residential mortgages, construction, consumer installment, commercial, agricultural, and home equity lines of credit. In addition, the bank participates in various government-sponsored loan programs offered through the Small Business Administration (SBA) and United States Department of Agriculture (USDA). Deposit products include personal checking and savings, business/commercial checking and savings, money markets, certificates of deposit, and more.

Details of the bank's loan portfolio composition are provided in the following table.

Composition of Loan Portfolio as of **June 30, 2025** (000's)		
Type	$	%
Commercial	545,625	53.9
Residential Real Estate	219,577	21.7
Agriculture	192,192	19.0
Consumer	40,835	4.0
Other	14,608	1.4
Total	1,012,837	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

There are no known legal, financial or other factors impeding the bank's ability to help meet the credit needs in its communities.

The bank was rated **satisfactory** under the CRA at its previous evaluation conducted on July 18, 2022.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's lending and community development test performance in the Davenport-Moline-Rock Island, IA-IL MSA, the state of Iowa, and the state of Illinois were given the greatest weight in the overall ratings based on the percentage of HMDA-reportable, small business and small farm loan volume, the size and breadth of the branch network, and total deposits.

LENDING TEST

CBI Bank & Trust's performance relative to the lending test is Satisfactory. Overall, the bank is meeting the credit needs of its assessment areas based on an analysis of the bank's lending activities. The loan-to-deposit (LTD) ratio is reasonable given the bank's size, complexity, capacity to lend, financial condition, and combined assessment area credit needs. A substantial majority of HMDA-reportable, small business, and small farm loans were originated in the assessment areas. Further, the geographic distribution of loans reflects reasonable dispersion throughout the assessment areas, and lending activities reflects reasonable penetration among individuals of different income levels, including low- and moderate-income, and to businesses and farms of different revenue sizes.

Loan-to-Deposit Ratio

CBI Bank & Trust has a reasonable LTD ratio given its asset size, financial condition, capacity to lend, and credit needs of its assessment areas and considering, as appropriate, other lending-related activities such as loan originations for sale to the secondary markets and community development loans and qualified investments.

As of June 30, 2025, the bank's 12-quarter average LTD ratio was 72.9 percent, which is comparable to the 13-quarter average LTD ratio at the previous evaluation (75.2 percent). This is indicative of the bank's consistent willingness to lend and meet the credit needs of the combined assessment area it serves. When compared to a sample of local competitors who operate in the same assessment areas and have similar loan portfolio composition, the bank's current LTD ratio remains comparable to the peer average.

The following table compares CBI Bank & Trust's LTD ratio to its local competitors.

Comparative Loan-to-Deposit Ratios as of June 30, 2025	
Comparative Data	**14 Quarter Average (%)**
CBI Bank & Trust	72.9
Peer Avg – Local	82.1
Competitors	
Horicon Bank	89.0
Two Rivers B&TC	84.5
Bank of Pontiac	82.9
Foresight Bank	81.8
Blackhawk Bank & Trust	72.2

Assessment Area Concentration

CBI Bank & Trust made a substantial majority of its loans in its combined assessment area. During the evaluation period, the bank originated 90.1 percent of total loans by number and 85.6 percent of total loans by dollar inside the combined assessment area. The bank's overall combined assessment area concentration increased slightly, by both number (87.1 percent) and dollar volume (84.2 percent), since the previous evaluation period. The addition of the Rockford, IL MSA and Janesville-Beloit, WI MSA contributed to the bank's increase in assessment area lending concentration. HMDA-reportable, small business, and small farm loans had similar concentration rates by number and dollar volume within the combined assessment area. This performance indicates the bank is actively serving the credit needs of the local communities within its assessment areas.

The following table summarizes CBI Bank & Trust's lending inside and outside its combined assessment area for HMDA-reportable loans from January 1, 2023, through December 31, 2024, and small business and small farm loans from January 1, 2024, through December 31, 2024.

Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	211	90.6	9,374	86.6	22	9.4	1,422	13.2
Home Purchase - Conv.	606	87.1	96,085	80.4	90	12.9	23,359	19.6
Home Purchase – VA	0	0.0	0	0.0	1	100.0	174	100.0
Loan Purpose N/A	4	80.0	317	78.5	1	20.0	87	21.5
Multi-Family Housing	60	96.8	27,490	91.6	2	3.2	2,510	8.4
Refinancing	305	94.4	26,120	93.4	18	5.6	1,846	6.6
Total HMDA Related	**1,186**	**89.8**	**159,386**	**84.4**	**134**	**10.2**	**29,398**	**15.6**
Small Business	**104**	**89.7**	**20,794**	**92.6**	**12**	**10.3**	**1,664**	**7.4**
Small Farm	**97**	**93.3**	**10,245**	**90.7**	**7**	**6.7**	**1,046**	**9.3**
TOTAL LOANS	**1,387**	**90.1**	**190,425**	**85.6**	**153**	**9.9**	**32,108**	**14.4**

Geographic and Borrower Distribution

CBI Bank & Trust demonstrated a reasonable geographic distribution of loans given the bank's assessment areas. Additionally, the bank's distribution of loans to individuals of different income levels (including low- and moderate-income individuals) and businesses and farms of different sizes is reasonable given the demographics of the bank's assessment areas. The state ratings, driven by the full review assessment areas, reflected both reasonable geographic and borrower distribution of the bank's HMDA-reportable loans, and a sample of small business and small farm loans. Additional information regarding the CBI Bank & Trust's performance is provided within the individual assessment area discussions.

Response to Complaints

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

The bank's performance relative to the community development test is Outstanding.

Lending, Investment, and Services Activities

CBI Bank & Trust demonstrates excellent responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, and considering the bank's capacity, resources, and the need and availability of such opportunities for community development across the combined assessment area.

The bank originated 62 qualified loans with a total of $61.6 million toward community services, affordable housing, economic development, and revitalization and stabilization activities within its combined assessment area. Community development lending significantly increased by dollar amount since the previous evaluation ($44.1 million) which is largely attributed to the addition of the Janesville-Beloit, WI MSA and Rockford, IL MSA to the bank's combined assessment area.

CBI Bank & Trust made eight new investments totaling approximately $3.5 million and had 24 qualified investments from the prior evaluation period with an outstanding balance of $11 million. During the prior evaluation period, the bank made 26 total investments for a total of $11.6 million. The bank made 368 qualified contributions to organizations which support affordable housing, economic development, revitalization and stabilization of distressed or underserved geographies, and community services tailored to meet the needs of low- and moderate-income individuals and households in the bank's combined assessment area. Donations totaled $923,011 which was a significant increase from the previous evaluation ($468,794).

During the review period, CBI Bank & Trust served organizations by providing 6,537.5 community development hours. A majority of service hours were dedicated to organizations with a community service or economic development focus. Benefitting from these services were organizations that received financial planning or resource allocation services as well as programs that target low- and moderate-income individuals throughout the bank's combined assessment area. Bank employees served as board members or committee members for several of these organizations. The bank's qualified community development service hours totaled 4,937.5 hours during the previous evaluation.

Additional information with respect to CBI Bank & Trust's community development activities is found within the individual assessment area discussions.

Community Development Activities July 19, 2022 – October 20, 2025								
Assessment Area	Loans		Investments		Donations		Services	
	#	$	#	$	#	$	#	Hours
Full Review								
Iowa Non-MSA	13	14,685,000	2	1,025,000	80	439,755	22	990.5
Illinois Non-MSA	20	8,447,309	10	3,955,000	105	204,919	26	2324.5
Davenport-Moline-Rock Island, IA-IL MSA #19340	6	1,809,500	6	3,914,000	48	94,141	20	1103.5
Janesville-Beloit, WI MSA #27500	5	7,895,000	0	0	18	12,337	14	397
Limited Review								
Peoria, IL MSA #37900	6	5,690,036	3	1,360,000	12	21,875	11	836.5
Iowa City, IA MSA #26980	7	14,406,277	11	4,230,000	97	148,422	21	672.5
Rockford, IL MSA #40420	4	7,617,901	0	0	8	2,062.99	5	213
Enhancement								
Broader Statewide and Regional Area	1	1,000,000	0	0	0	0	0	0
Total Qualified	62	61,551,022	32	14,484,000	368	923,011	119	6537.5

Fair Lending or Other Illegal Credit Practices Review

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

DAVENPORT-MOLINE-ROCK ISLAND, IA-IL MSA #19340 – FULL REVIEW

CRA RATING FOR DAVENPORT-MOLINE-ROCK ISLAND, IA-IL MSA: Satisfactory
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

CBI Bank & Trust is rated Satisfactory in the Davenport-Moline-Rock Island, IA-IL MSA based on reasonable geographic distribution of loans throughout the assessment area and a reasonable penetration among individuals of different income levels, and to businesses and farms of different revenue sizes. The bank demonstrates excellent responsiveness to the needs of its assessment area through community development loans, qualified investments, and community development services. This performance is appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the Davenport-Moline-Rock Island, IA-IL MSA assessment area.

SCOPE OF EXAMINATION

The scope of review for the Davenport-Moline-Rock Island, IA-IL assessment area is consistent with the overall scope presented in the "Scope of Examination" section of the performance evaluation. Due to the addition of five branches in the assessment area (Davenport, Bettendorf, and Buffalo, IA; Joy and Moline, IL) in late 2023 and early 2024, conclusions derived from HMDA-reportable lending will be driven by the bank's 2024 performance. Please refer to the Scope of Examination section for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DAVENPORT-MOLINE-ROCK ISLAND, IA-IL MSA

CBI Bank & Trust designates Scott County in Iowa and Mercer and Rock Island Counties in Illinois as its assessment area; and the delineation is unchanged since the previous evaluation.

The bank operates nine branches and twelve cash-only ATMs within the assessment area. Since the previous evaluation, as a result of CBI Bank & Trust's October 2023 acquisition of six SENB Bank branches (four of which are located in the Davenport-Moline-Rock Island, IA-IL MSA assessment area) and the January 2024 acquisition of one branch (Joy, IL) from Farmers-Merchants Bank of Illinois, the bank increased their branch footprint in the assessment area from four branches to nine branches. Additionally, the number of ATMs in the assessment area increased from four to 12 since the prior evaluation (all of which are cash-only and five are stand-alone). No branches or ATMs in the assessment area are located in low- or moderate-income census tracts.

Based on 2024 FFIEC census data and 2016-2020 American Community Survey (ACS) data, the assessment area is comprised of 95 total census tracts including three low-, 28 moderate-, 48 middle-, 15 upper-, and one unknown-income census tract. The unknown-income census tract is along the Mississippi River in Scott County and is mainly comprised of large industrial and commercial areas.

As of the June 30, 2024, Federal Deposit Insurance Corporations' (FDIC) Deposit Market Share Report ranked CBI Bank & Trust fifth among 25 FDIC-insured institutions operating in the assessment area. The bank holds a 5.5 percent market share, compared to the market leader Quad City Bank & Trust which holds 25.2 percent of the assessment area's deposits.

In 2024, CBI Bank & Trust ranked 14th among 253 financial institutions that originated or purchased HMDA-reportable loans. A total of 178 originations were reported by the bank. By comparison, GreenState Credit Union and I.H. Mississippi Valley Credit Union ranked first and second in the market with 795 and 525 originations or purchases, respectively. This is indicative of a very saturated, competitive market for HMDA-reportable loan applications, thus making it difficult for the bank to originate HMDA-reportable loans with its limited market share.

Additional assessment area demographic information is provided in the following table. Please refer to Appendix C for 2023 demographic information.

2024 Davenport-Moline-Rock Island, IA-IL MSA 19340 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	3.2	1,357	1.6	515	38.0	16,642	19.7
Moderate	28	29.5	17,530	20.8	2,963	16.9	15,817	18.7
Middle	48	50.5	46,598	55.2	3,729	8.0	17,920	21.2
Upper	15	15.8	18,822	22.3	704	3.7	34,048	40.3
Unknown	1	1.1	120	0.1	29	24.2	0	0.0
Total AA	**95**	**100.0**	**84,427**	**100.0**	**7,940**	**9.4**	**84,427**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,980	972	1.0	32.6	1,487	49.9	521	17.5
Moderate	35,223	16,779	17.9	47.6	14,172	40.2	4,272	12.1
Middle	80,295	54,051	57.8	67.3	19,564	24.4	6,680	8.3
Upper	28,590	21,680	23.2	75.8	4,892	17.1	2,018	7.1
Unknown	1,188	74	0.1	6.2	850	71.5	264	22.2
Total AA	**148,276**	**93,556**	**100.0**	**63.1**	**40,965**	**27.6**	**13,755**	**9.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	309	2.5	250	2.3	56	5.2	3	1.7
Moderate	2,799	23.0	2,467	22.6	304	28.1	28	16.3
Middle	5,798	47.6	5,230	47.8	473	43.8	95	55.2
Upper	2,882	23.7	2,643	24.2	201	18.6	38	22.1
Unknown	397	3.3	343	3.1	46	4.3	8	4.7
Total AA	**12,185**	**100.0**	**10,933**	**100.0**	**1,080**	**100.0**	**172**	**100.0**
Percentage of Total Businesses:				**89.7**		**8.9**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	6	1.3	6	1.3	0	0.0	0	0.0
Middle	289	63.0	288	63.6	1	16.7	0	0.0
Upper	161	35.1	156	34.4	5	83.3	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**459**	**100.0**	**453**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.7**		**1.3**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Population Characteristics

The assessment area's population (335,040) experienced minimal growth from 2015 to 2020 with an increase of 0.5 percent, which was below the state of Iowa's population increase (3.1 percent), but above the change in population for the state of Illinois, which lost 0.5 percent. Within the individual counties that comprise the assessment area, Scott County, Iowa experienced the largest population increase (2.8 percent) which was consistent with the state of Iowa overall. Scott County also represents the most populated county within the bank's assessment area with 52.1 percent of the total assessment area population. Mercer and Rock Island counties, located in the state of Illinois, experienced a decline of 2.5 percent and 1.7 percent, respectively. A community representative noted that area residents relocate to other parts of the United States, while those who move to the area are emigrating from international locations. The region is home to various industries with an international workforce, including John Deere World Headquarters.

As noted in the table below, there are subtle differences between Rock Island County and Scott County population shifts, the two most populated counties in the assessment area, which is reflective of differences in housing, infrastructure, and economic development growth opportunities between the two as noted below. The population growth in Scott County is, in part, driven by available farmland that is being developed, according to community representatives. In Rock Island County, land is fully developed, the infrastructure in place is limited, and opportunity for growth is limited. Additionally, a central portion of land between the cities of Rock Island and Moline, Illinois is an island in the Mississippi River, prohibiting outward growth in that section.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change (%)**
Assessment Area	333,262	335,040	0.5
Mercer County, IL	16,107	15,699	-2.5
Rock Island County, IL	147,161	144,672	-1.7
Scott County, IA	169,994	174,669	2.8
Davenport-Moline-Rock Island, IA-IL MSA	383,145	384,324	0.3
Illinois	12,873,761	12,812,508	-0.5
Iowa	3,093,526	3,190,369	3.1
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

Income Characteristics

According to 2024 FFIEC Census Data, the assessment area is comprised of 84,427 families, of which 19.7 percent are designated as low-income, 18.7 percent moderate-income, 21.2 percent middle-income, and 40.3 percent are designated as upper-income. Further, 9.4 percent of families residing within the assessment area live below the poverty line, slightly above both the state of Illinois (8.5 percent) and the state of Iowa (7.1 percent). According to the 2016-2020 ACS, the median family income (MFI) for the assessment area is $76,835 which remains below both the MFI for the state of Iowa and the state of Illinois, at $79,186 and $86,251, respectively. When compared to their respective states, both Mercer ($74,681) and Rock Island ($72,445) Counties have MFIs below the state of Illinois, while Scott County ($82,256) exceeds the state of Iowa.

As illustrated in the following table, MFI growth in the state of Illinois is outpacing that of the state of Iowa. According to community representatives, this is attributed to the minimum wage differences in each state. This is supported by the minimum wage trends from the U.S. Department of Labor and analyzed by the Federal Reserve Bank of St. Louis's Federal Reserve Economic Data (FRED), as the Illinois minimum wage in 2015 was $8.25 per hour, compared to Iowa's minimum wage ($7.25 per hour) which is set at the federal level. In 2020, the Illinois minimum wage increased to $10.00 per hour and continued to increase by one dollar per hour each year after, to the current $15.00 per hour minimum wage for 2025. The minimum wage for the state of Iowa remains at $7.25 per hour. However, with the economic region spanning across two states, employers on the Iowa side of the Mississippi River will raise wages to attract Illinois residents, according to community representatives. Even with wage matching and higher entry-level wages at employers such as Amazon, current incomes in the assessment area are still insufficient to fully cover living costs. A community representative shared this can result in families taking on second jobs like Amazon's "flex driving," which offers higher hourly wages, but no employee benefits.

Median Family Income Change			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change (%)**
Assessment Area	72,469	76,835	6.0
Mercer County, IL	70,634	74,681	5.7
Rock Island County, IL	67,625	72,445	7.1
Scott County, IA	78,879	82,256	4.3
Davenport-Moline-Rock Island, IA-IL MSA	72,766	76,902	5.7
Illinois	78,169	86,251	10.3
Iowa	73,712	79,186	7.4
Source: 2011 - 2015 and 2016 -2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

There are 148,276 total housing units within the assessment area. The majority of housing units are owner-occupied at 63.1 percent followed by rental units comprising 27.6 percent of housing units. Vacant housing units (9.3 percent) within the assessment area are consistent with the number of vacant units within both the state of Iowa (9.5 percent) and the state of Illinois (9.1 percent).

According to 2024 FFIEC Census Data, the assessment area had a median housing value of $144,294 and median gross rent of $781. The three counties that comprise the assessment area experienced housing value increases at a lower rate when compared to their respective states from 2015 to 2020. Median gross rent within the assessment area saw an increase of 12.4 percent with the largest increase in median gross rent in Mercer County, which saw an increase of 21.6 percent.

Households are considered housing cost burdened when their gross monthly housing costs in relation to gross monthly income is 30.0 percent or above. As shown in the following table, large percentages of low-income households, whether renters or homeowners, are housing cost burdened; however, residents across all income levels and ownership categories in Scott County are housing burdened at a consistent rate with residents in the state of Iowa as a whole, while residents in Mercer and Rock Island Counties are housing burdened at a rate below the state of Illinois, as a whole.

According to FFIEC HMDA loan and application records, home mortgage trends reflect decreases in home mortgage activity in recent years across the assessment area counties and the broader region. These trends suggest a continued decrease in demand for home purchases as home values continue to increase, indicating that housing cost burden for low- and moderate-income homeowners will remain elevated.

Community representatives indicated the most pressing challenge to the local economy is the lack of affordable housing available throughout the assessment area. According to one representative, the Quad Cities Housing Council identified a gap of over 6,600 affordable housing units that are needed to address assessment area demand, which includes needs for new construction, rehabilitation of existing properties, and rental subsidies. Community representatives also noted portions of the assessment area have very low-quality housing as well as a high volume of vacant housing.

Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	71.5%	26.8%	39.9%	60.3%	22.6%	14.3%
Mercer County, IL	53.4%	26.2%	33.5%	50.6%	18.9%	12.6%
Rock Island County, IL	69.3%	26.1%	40.4%	58.0%	19.7%	14.4%
Scott County, IA	75.1%	27.4%	39.9%	64.2%	25.8%	14.4%
Davenport-Moline-Rock Island, IA-IL MSA	71.0%	24.7%	39.4%	58.5%	20.9%	14.0%
Illinois	73.6%	34.6%	41.8%	67.0%	34.3%	20.8%
Iowa	71.9%	21.4%	37.9%	58.7%	23.5%	14.9%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Employment Conditions

The unemployment rates for the assessment area, state of Iowa, and state of Illinois steadily declined post-pandemic from 2020-2022 with modest upward trends in 2023 and 2024. Both the Iowa and Illinois portions of the assessment area experienced unemployment at higher rates than their respective states. In 2024, unemployment rates in Scott County (3.7 percent) were below the unemployment rates in Rock Island and Mercer Counties of 5.5 percent and 5.4 percent, respectively. Community representatives stated the unemployment rate has been gradually decreasing and is currently back to pre-pandemic levels which can be attributed to an improving economy. Further, representatives believe opportunities to work are available; however, they stated that businesses within rural areas are taking longer to return to a pre-pandemic state. Representatives also indicated that due to the recent tightening of the labor market, they anticipate the unemployment rate will decrease as local businesses begin to raise wages to attract and retain employees.

The following table presents the unemployment trends for the assessment area, the state of Iowa, and the state of Illinois from 2020 to 2024.

Unemployment Rates					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	7.7%	5.2%	3.8%	4.2%	4.5%
Mercer County, IL	8.0%	5.0%	4.4%	4.8%	5.4%
Rock Island County, IL	9.2%	5.6%	4.5%	5.2%	5.5%
Scott County, IA	6.5%	4.9%	3.2%	3.3%	3.7%
Davenport-Moline-Rock Island, IA-IL MSA	7.7%	5.2%	3.9%	4.3%	4.6%
Illinois	9.3%	6.1%	4.6%	4.5%	5.0%
Iowa	5.2%	3.9%	2.8%	2.9%	3.0%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Industry Characteristics

The assessment area contains a diverse employment base that includes manufacturing, health care, retail trade, and food services. Community representatives indicated that area employment opportunities are led by the John Deere Global Headquarters and the Rock Island Arsenal.
In addition to these major employers, Dun & Bradstreet data indicates that there were 12,185 businesses and 459 farms located within the assessment area in 2024, and the majority (89.7 percent and 98.7 percent, respectively) had revenues of $1 million or less.

Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on affordable housing, employment, and economic development needs within the assessment area. Both representatives cited the notable differences between the Iowa and Illinois counties in the assessment area based on the state they are located in. While Scott County has room to grow through the development of farmland, Rock Island County has an aging infrastructure, with no land for additional development. They also noted thousands of affordable housing units are needed to fill the housing gap, with long waitlists for available home improvement and repair programs. Representatives noted that wages across both states are driven by the rising Illinois minimum wage as Iowa's minimum wage remains at the federal level; however, working families seek second jobs to afford the cost of living.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DAVENPORT-MOLINE-ROCK ISLAND, IA-IL MSA

LENDING TEST

CBI Bank & Trust's performance relative to the lending test in the Davenport-Moline-Rock Island, IA-IL MSA assessment area is **satisfactory** based on reasonable geographic dispersion of the bank's lending throughout the assessment area and reasonable penetration among borrowers of different incomes and businesses and farms of different revenue sizes.

Geographic Distribution of Loans

CBI Bank & Trust demonstrates reasonable geographic distribution of loans throughout the bank's assessment area. An analysis of the geographic distribution of HMDA-reportable, small business, and small farm loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly low- and moderate-income census tracts. The Davenport-Moline-Rock Island, IA-IL MSA assessment area consists of three low-income, 28 moderate-income, 48 middle-income, 15 upper-income, and one unknown-income census tract. In 2024, the bank originated loans in 76.8 percent of the census tracts in the assessment area, including two of the three low-income census tracts and 18 of the 28 moderate-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps. A detailed discussion of HMDA-reportable, small business, and small farm lending in relation to assessment area demographics is provided below.

<u>HMDA-Reportable Loans</u>

Geographic distribution of HMDA-reportable loans reflects reasonable penetration throughout the assessment area. In 2024, CBI Bank & Trust originated 1.8 percent of its total HMDA-reportable loans in low-income census tracts in the assessment area by number, which was consistent with the aggregate of lenders by number (0.5 percent) and the percentage of owner-occupied units (1.0 percent) located in low-income tracts. The bank originated 16.6 percent of its total HMDA-reportable loans in moderate-income census tracts by number which was slightly below the aggregate of lenders by number (19.5 percent), but consistent with the percentage of owner-occupied units (17.9 percent) in moderate-income tracts.

Geographic dispersion of 2023 HMDA-reportable loans were comparable. The primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations.

Home Purchase

CBI Bank & Trust did not originate any home purchase loans in low-income census tracts in 2024. This was slightly below the aggregate of lenders which made 0.5 percent by number of HMDA-reportable home purchase loans in these census tracts, and the percentage of owner-occupied units in low-income census tracts (1.0 percent). The bank made 13.0 percent of its home purchase loans by number in moderate-income census tracts in 2024. This was below the aggregate of lenders by number (19.7 percent) and the percentage of owner-occupied units comprising such tracts (17.9 percent).

The bank originated 63.6 percent of its home purchase loans by number in middle-income census tracts in 2024. This was above the percentage of aggregate lenders by number (56.1 percent) and the percentage of owner-occupied units comprising such tracts (57.8 percent). CBI Bank & Trust made 23.4 percent, by number, of its home purchase loans in upper-income census tracts, which was consistent with aggregate lender performance by number (23.6 percent) and the percentage of owner-occupied units comprising these tracts (23.2 percent).

The 2023 geographic distribution of HMDA-reportable home purchase loans exceeded that of 2024.

Refinance

CBI Bank & Trust originated one refinance loan (2.3 percent) in a low-income census tract in 2024, which was above both aggregate lenders and the percentage of owner-occupied units in low-income census tracts at 0.4 percent and 1.0 percent, respectively. The bank made 4.5 percent of HMDA-reportable refinance loans by number in moderate-income census tracts, which was below both aggregate lenders and the percentage of owner-occupied units in moderate-income census tracts at 17.2 percent and 17.9 percent, respectively.

The bank originated 75.0 percent of its HMDA-reportable refinance loans by number in middle-income census tracts in 2024, which was above the percentage of aggregate lenders by number (54.3 percent) and the percentage of owner-occupied units comprising such tracts (57.8 percent). CBI Bank & Trust made 18.2 percent, by number, of its refinance loans in upper-income census tracts, which was below aggregate lender performance by number (27.8 percent) and the percentage of owner-occupied units comprising these tracts (23.2 percent).

The 2023 geographic distribution of HMDA-reportable refinance loans was consistent with that of 2024. The following table presents the 2023 and 2024 geographic distribution of HMDA-reportable loans in the assessment area.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Davenport-Moline-Rock Island, IA-IL MSA 19340													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	0.5	0	0.0	0.2	1.0
Moderate	10	26.3	20.4	1,514	24.1	13.3	10	13.0	19.7	1,005	6.5	12.4	17.9
Middle	22	57.9	56.5	3,162	50.3	50.6	49	63.6	56.1	7,686	49.5	50.3	57.8
Upper	6	15.8	22.1	1,610	25.6	35.7	18	23.4	23.6	6,833	44.0	37.1	23.2
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	6,286	100.0	100.0	77	100.0	100.0	15,524	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.6	0	0.0	0.4	1	2.3	0.4	63	1.9	0.2	1.0
Moderate	2	8.0	20.0	92	3.7	13.5	2	4.5	17.2	150	4.4	11.0	17.9
Middle	15	60.0	57.3	1,516	61.0	52.3	33	75.0	54.3	2,037	60.0	46.5	57.8
Upper	8	32.0	21.9	877	35.3	33.2	8	18.2	27.8	1,145	33.7	42.2	23.2
Unknown	0	0.0	0.3	0	0.0	0.6	0	0.0	0.3	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	2,485	100.0	100.0	44	100.0	100.0	3,395	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.8	0	0.0	0.9	1.0
Moderate	1	9.1	18.8	655	61.1	16.8	6	19.4	20.9	216	13.7	14.2	17.9
Middle	6	54.5	55.7	201	18.8	50.4	19	61.3	51.1	1,005	63.6	47.3	57.8
Upper	4	36.4	25.0	216	20.1	32.6	6	19.4	27.2	360	22.8	37.6	23.2
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	1,072	100.0	100.0	31	100.0	100.0	1,581	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	12.5	3.7	383	11.8	3.8	2	12.5	2.1	137	4.8	0.1	4.5
Moderate	4	50.0	39.0	1,526	47.1	34.0	9	56.3	38.1	1,916	66.6	12.8	30.0
Middle	3	37.5	43.9	1,331	41.1	51.0	3	18.8	49.5	727	25.3	78.5	46.0
Upper	0	0.0	9.8	0	0.0	8.5	0	0.0	8.2	0	0.0	8.5	15.9
Unknown	0	0.0	3.7	0	0.0	2.7	2	12.5	2.1	96	3.3	0.1	3.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	3,240	100.0	100.0	16	100.0	100.0	2,876	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	1.2	0.7	383	2.9	0.5	3	1.8	0.5	200	0.9	0.2	1.0
Moderate	17	20.7	20.4	3,787	28.9	14.3	28	16.6	19.5	3,376	14.4	12.3	17.9
Middle	46	56.1	56.2	6,210	47.5	50.9	104	61.5	55.1	11,455	48.8	51.8	57.8
Upper	18	22.0	22.5	2,703	20.7	34.2	32	18.9	24.8	8,338	35.5	35.7	23.2
Unknown	0	0.0	0.2	0	0.0	0.2	2	1.2	0.1	96	0.4	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	82	100.0	100.0	13,083	100.0	100.0	169	100.0	100.0	23,465	100.0	100.0	100.0

Source: 2024 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 Loans

Geographic distribution of small business loans reflects poor penetration throughout the assessment area. In 2024, CBI Bank & Trust originated 3.1 percent of its small business loans by number in low-income census tracts, which is consistent with the percentage of total businesses in low-income census tracts (2.5 percent). The bank made 6.3 percent of its small business loans by number in moderate-income census tracts, which was significantly below the percentage of total businesses located in moderate-income census tracts (23.0 percent). The majority of CBI Bank & Trust's small business loans by number were originated in middle-income census tracts (65.6 percent) which is significantly above the percentage of small businesses residing within such geographies (47.6 percent). The bank originated 21.9 percent of its small business loans by number in upper-income census tracts, slightly below the percentage of total businesses within these tracts (23.7 percent).

The following table presents the geographic distribution of small business loans in the assessment area in 2024.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Davenport-Moline-Rock Island, IA-IL MSA 19340					
Geographic Income Level	Bank Loans				Total
	#	#%	$(000)	$%	Businesses %
Low	1	3.1	80	1.0	2.5
Moderate	2	6.3	321	4.0	23.0
Middle	21	65.6	6,175	76.2	47.6
Upper	7	21.9	1,403	17.3	23.7
Unknown	1	3.1	120	1.5	3.3
Tract-Unk	0	0.0	0	0.0	
Total	32	100.0	8,099	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

Geographic distribution of small farm loans reflects reasonable penetration throughout the assessment area. In 2024, CBI Bank & Trust did not originate any small farm loans in the low- or moderate-income census tracts in the assessment area. However, only 0.4 percent of total farms (two farms) are located in low-income census tracts and only 1.3 percent of total farms (six farms) are located in moderate-income tracts, indicating limited opportunity for small farm lending in these tracts. The majority of the bank's small farm loans by number (62.5 percent) were originated in middle-income census tracts, consistent with the percentage of small farms located in those tracts (63.0 percent). The bank originated 37.5 percent by number of small farm loans in upper-income census tracts, consistent with the percentage of total farms in these tracts (35.1 percent).

The following table presents the geographic distribution of small farm loans in the assessment area in 2024.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Davenport-Moline-Rock Island, IA-IL MSA 19340					
Geographic Income Level	**Bank Loans**				**Total Farms %**
	#	**#%**	**$(000)**	**$%**	
Low	0	0.0	0	0.0	0.4
Moderate	0	0.0	0	0.0	1.3
Middle	25	62.5	2,911	79.3	63.0
Upper	15	37.5	757	20.6	35.1
Unknown	0	0.0	0	0.0	0.2
Tract-Unk	0	0.0	0	0.0	
Total	40	100.0	3,669	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

CBI Bank & Trust demonstrates a distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment areas. The bank’s primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable loan products will not be evaluated due to low volumes of originations.

<u>HMDA-Reportable Loans</u>

The distribution of HMDA-reportable loans reflects reasonable penetration among borrowers of different income levels. In 2024, CBI Bank & Trust originated 12.4 percent by number of its HMDA-reportable loans to low-income borrowers, above aggregate lenders (9.2 percent), but below the percentage of low-income families in the assessment area (19.7 percent). The bank originated 19.6 percent by number of its HMDA-reportable loans to moderate-income borrowers, consistent with both aggregate lenders (20.6 percent) and the percentage of families designated as moderate-income in the assessment area (18.7 percent). Lastly, the bank made 13.7 percent of its

HMDA-reportable loans by number to borrowers with unknown incomes, compared to the 19.1 percent originated by aggregate lenders. The substantial majority of these HMDA-reportable loans were made to businesses; therefore, income information was not collected.

In 2023, the bank's distribution of HMDA-reportable lending to borrowers of different income levels was below that of 2024; however, emphasis was placed on 2024 lending performance for this evaluation.

Home Purchase

CBI Bank & Trust originated 10.4 percent of HMDA-reportable home purchase loans by number to low-income borrowers which was consistent with aggregate lender performance (9.0 percent), but below the percentage of low-income families in the assessment area (19.7 percent). The bank originated 19.5 percent of HMDA-reportable home purchase loans by number to moderate-income borrowers which was consistent with both aggregate lender performance (22.0 percent) and the percentage of moderate-income families in the assessment area (18.7 percent).

CBI Bank & Trust made 18.2 percent of its HMDA-reportable home purchase loans by number to middle-income borrowers in 2024 which was comparable to aggregate lender performance (20.3 percent) and the percentage of middle-income families in the assessment area (21.2 percent). The bank made 37.7 percent of HMDA-reportable home purchase loans by number to upper-income borrowers, above the percentage of aggregate lenders by number (28.3 percent), but consistent with the percentage of upper-income families in the assessment area (40.3 percent). Lastly, the bank made 14.3 percent of its home purchase loans by number to borrowers of unknown income, compared to the 20.3 percent originated by aggregate lenders.

Refinance

CBI Bank & Trust originated 15.9 percent of HMDA-reportable refinance loans by number to low-income borrowers which exceeded aggregate lender performance (9.6 percent), but is below the percentage of low-income families in the assessment area (19.7 percent). The bank originated 27.3 percent of its HMDA-reportable refinance loans by number to moderate-income borrowers which was above both aggregate lender performance (18.4 percent) and the percentage of moderate-income families in the assessment area (18.7 percent).

The bank made 18.2 percent of refinance loans by number to middle-income borrowers which was consistent with both aggregate lender performance (20.4 percent) and the percentage of middle-income families in the assessment area (21.2 percent). CBI Bank & Trust made 22.7 percent of its refinance loans in this assessment area to upper-income borrowers, which was below aggregate lender performance (28.4 percent) and significantly below the percentage of upper-income families in the assessment area (40.3 percent). Lastly, the bank made 15.9 percent of its refinance loans by number to borrowers of unknown income compared to the 23.2 percent originated by aggregate lenders.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area in 2023 and 2024.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Davenport-Moline-Rock Island, IA-IL MSA 19340													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	5.3	11.5	54	0.9	5.8	8	10.4	9.0	796	5.1	4.4	19.7
Moderate	7	18.4	22.8	834	13.3	16.0	15	19.5	22.0	2,002	12.9	14.6	18.7
Middle	6	15.8	19.4	812	12.9	18.6	14	18.2	20.3	2,377	15.3	18.0	21.2
Upper	13	34.2	24.5	3,179	50.6	38.2	29	37.7	28.3	8,957	57.7	41.6	40.3
Unknown	10	26.3	21.8	1,407	22.4	21.5	11	14.3	20.3	1,392	9.0	21.4	0.0
Total	38	100.0	100.0	6,286	100.0	100.0	77	100.0	100.0	15,524	100.0	100.0	100.0
Refinance Loans													
Low	1	4.0	12.1	69	2.8	6.7	7	15.9	9.6	270	8.0	4.8	19.7
Moderate	5	20.0	20.7	358	14.4	14.8	12	27.3	18.4	765	22.5	11.0	18.7
Middle	2	8.0	21.7	47	1.9	20.1	8	18.2	20.4	747	22.0	15.9	21.2
Upper	11	44.0	29.6	1,478	59.5	40.6	10	22.7	28.4	1,212	35.7	39.2	40.3
Unknown	6	24.0	15.9	533	21.4	17.9	7	15.9	23.2	401	11.8	29.1	0.0
Total	25	100.0	100.0	2,485	100.0	100.0	44	100.0	100.0	3,395	100.0	100.0	100.0
Home Improvement Loans													
Low	1	9.1	9.9	35	3.3	7.1	4	12.9	8.8	114	7.2	4.5	19.7
Moderate	0	0.0	19.8	0	0.0	13.3	3	9.7	15.3	39	2.5	11.9	18.7
Middle	3	27.3	22.1	95	8.9	18.6	7	22.6	19.6	428	27.1	15.8	21.2
Upper	6	54.5	35.9	287	26.8	40.3	14	45.2	42.9	794	50.2	52.4	40.3
Unknown	1	9.1	12.2	655	61.1	20.6	3	9.7	13.3	206	13.0	15.5	0.0
Total	11	100.0	100.0	1,072	100.0	100.0	31	100.0	100.0	1,581	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	5.4	11.4	158	1.6	6.0	19	12.4	9.2	1,180	5.7	4.6	19.7
Moderate	12	16.2	22.2	1,192	12.1	15.8	30	19.6	20.6	2,806	13.6	13.8	18.7
Middle	11	14.9	20.3	954	9.7	18.8	29	19.0	20.8	3,552	17.3	17.6	21.2
Upper	30	40.5	26.9	4,944	50.2	38.6	54	35.3	30.3	11,052	53.7	41.8	40.3
Unknown	17	23.0	19.3	2,595	26.4	20.8	21	13.7	19.1	1,999	9.7	22.2	0.0
Total	74	100.0	100.0	9,843	100.0	100.0	153	100.0	100.0	20,589	100.0	100.0	100.0

Source: 2024 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 Loans

Borrower distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. In 2024, CBI Bank & Trust originated 78.1 percent by number of its small business loans to small businesses reporting annual revenues of $1 million or less, compared to 89.7 percent of small businesses reporting annual revenues of $1 million or less in the assessment area. Of the bank's loans originated to small businesses, 52.0 percent were in amounts of $100,000 or less which is generally considered most beneficial to small businesses.

The following table summarizes the bank's 2024 small business lending in the assessment area.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Davenport-Moline-Rock Island, IA-IL MSA 19340					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	25	78.1	5,797	71.6	89.7
Over $1 Million	7	21.9	2,301	28.4	8.9
Revenue Unknown	0	0.0	0	0.0	1.4
Total	32	100.0	8,099	100.0	100.0
By Loan Size					
$100,000 or Less	15	46.9	660	8.1	
$100,001 - $250,000	5	15.6	822	10.1	
$250,001 - $1 Million	12	37.5	6,617	81.7	
Total	32	100.0	8,099	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	13	52.0	572	9.9	
$100,001 - $250,000	4	16.0	622	10.7	
$250,001 - $1 Million	8	32.0	4,603	79.4	
Total	25	100.0	5,797	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

Borrower distribution of small farm loans reflects reasonable penetration among farms of different revenue sizes. In 2024, CBI Bank & Trust originated 82.5 percent by number of its small farm loans to small farms reporting annual revenues of $1 million or less, compared to 98.7 percent of small farms reporting annual revenues of $1 million or less in the assessment area. Of the bank's loans originated to small farms, 75.8 percent were in amounts of $100,000 or less which is generally considered most beneficial to small farms.

The following table summarizes the bank's 2024 small farm lending in the assessment area.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Davenport-Moline-Rock Island, IA-IL MSA 19340					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	33	82.5	2,878	78.4	98.7
Over $1 Million	7	17.5	792	21.6	1.3
Revenue Unknown	0	0.0	0	0.0	0.0
Total	40	100.0	3,669	100.0	100.0
By Loan Size					
$100,000 or Less	29	72.5	1,189	32.4	
$100,001 - $250,000	8	20.0	1,428	38.9	
$250,001 - $500,000	3	7.5	1,052	28.7	
Total	40	100.0	3,669	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	25	75.8	995	34.6	
$100,001 - $250,000	5	15.2	831	28.9	
$250,001 - $500,000	3	9.1	1,052	36.6	
Total	33	100.0	2,878	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Lending, Investments, and Services Activities

CBI Bank & Trust's community development activities in the assessment area are **outstanding**. The bank demonstrates excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services.

Lending

CBI Bank & Trust originated six qualified community development loans totaling just over $1.8 million in the assessment area during the evaluation period. The majority of community development loans (66.7 percent) went towards revitalization/stabilization of the assessment area. While this presents a significant decrease in community development lending from the previous evaluation (17 loans for $5.7 million), other community development activities are consistent or better than performance at the previous evaluation in this assessment area.

Investment

CBI Bank & Trust had six qualified investments totaling just over $3.9 million in the assessment area. The bank made one new qualifying investment worth approximately $1.3 million. Additionally, five qualified investments with outstanding balances totaling approximately $2.6 million were qualified as part of this evaluation. The bank's investments in this assessment area were for community development purposes of revitalization/stabilization and affordable housing ($2.6 and $1.3 million, respectively). Community development investments in this assessment area address multiple credit needs identified by community representatives including affordable housing efforts, which is the greatest need in the assessment area, and revitalization/stabilization to support development in aging areas of the assessment area, such as Rock Island, Illinois and downtown Davenport, Iowa. Four of the six qualified investments specifically went towards these purposes including two bonds addressing revitalization/stabilization of downtown Davenport ($1 million), one bond addressing revitalization/stabilization of Rock Island ($595,000), and one bond addressing affordable housing in Rock Island ($1.3 million). Since the previous evaluation, investment totals in this assessment area have increased as the bank had $1.6 million in community development investments at the prior evaluation, as well as $1 million in prior period investments that were not submitted for evaluation. Additionally, the institution made 48 donations totaling approximately $94,000 which is comparable to the previous evaluation as the bank made 50 donations for $93,000.

Services

CBI Bank & Trust staff provided 1,103.5 qualified service hours to 20 organizations in the assessment area. This is an increase of 271.5 hours served from the previous evaluation, where bank staff provided 832 service hours to 11 organizations. Of the total qualified service hours, 339 hours were dedicated to nine organizations with an economic development focus, 643 hours were dedicated to nine organizations with a community services focus, and 121.5 hours were dedicated to two organizations with an affordable housing focus. The majority of hours included bank employees dedicating time serving on the boards of these organizations providing financial expertise.

The following table presents the CBI Bank & Trust's community development activities in the assessment area during the review period.

Summary of Community Development Activities from July 19, 2022 – October 20, 2025 Assessment Area: Des Moines-Moline-Rock Island, IA-IL MSA 19340										
Type of Activity	Affordable Housing		Economic Development		Revitalize and Stabilize		Community Service		Totals	
	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours
Lending	1	382,500	1	500,000	4	927,000	0	0	6	1,809,500
Investments	1	1,284,000	0	0	5	2,630,000	0	0	6	3,914,000
Donations	0	0	4	12,000	0	0	44	82,141	48	94,141
Services	2	121.5	9	339	0	0	9	643	20	1103.5

STATE OF IOWA

CRA RATING FOR IOWA: Outstanding
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

CBI Bank & Trust is rated Outstanding in the state of Iowa based on an excellent geographic distribution of loans throughout the assessment areas and reasonable penetration among individuals of different income levels, and businesses and farms of different sizes. The bank also demonstrates excellent responsiveness to the needs of its assessment areas through community development loans, qualified investments, and community development services. This performance is appropriate, considering the bank's capacity, and the need and availability of such opportunities for community development in the bank's assessment areas.

SCOPE OF EXAMINATION

A full-scope review was conducted to evaluate the bank's Iowa Non-MSA (Louisa County and Muscatine County) assessment area, and a limited-scope review was conducted on the bank's Iowa City, IA MSA assessment area. The scope of the review for the state of Iowa is consistent with the overall scope presented in the Scope of Examination section of the performance evaluation. Please refer to the Scope of Examination section for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF IOWA

CBI Bank & Trust delineates two assessment areas in the state of Iowa. The Iowa Non-MSA assessment area consists of Muscatine County and Louisa County, Iowa, in their entirety, and the Iowa City, IA MSA assessment area consists of the entireties of Johnson County and Washington County, Iowa. The bank's main office, six branches and eight cash-only ATMs are located in the state of Iowa.

Please refer to the individual assessment area summaries for additional details regarding the bank's operations, as well as demographic and economic conditions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

LENDING TEST

CBI Bank & Trust's performance relative to the lending test in the state of Iowa is **satisfactory** based on an excellent geographic distribution of loans throughout the assessment areas and a reasonable penetration among individuals of different income levels, and to businesses and farms of different sizes.

Geographic and Borrower Distribution

CBI Bank & Trust's lending activities reflect excellent geographic distribution throughout the assessment areas within the state of Iowa. Additionally, the distribution of loans reflects reasonable penetration among borrowers of different income levels, including low- and moderate-income, and businesses and farms of different revenue sizes.

Further discussion with respect to the geographic and borrower distribution of lending can be found in the individual assessment area analysis.

COMMUNITY DEVELOPMENT TEST

Lending, Investments, and Services Activities

CBI Bank & Trust's community development activities are outstanding. The bank demonstrates excellent responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

The conclusions regarding the bank's lending, investment (including donations) and service activities within the assessment areas are based on analysis of the full review assessment areas. Please refer to the individual assessment area for support of the overall rating.

IOWA NONMETROPOLITAN ASSESSMENT AREA– FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate CBI Bank & Trust's performance in the Iowa Non-MSA assessment area. The scope for this assessment area is consistent with the overall scope presented in the Scope of Examination section of this performance evaluation. Please refer to the Scope of Examination section for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IOWA NON-MSA

CBI Bank & Trust's Iowa Non-MSA assessment area consists of Muscatine and Louisa counties in their entireties. Since the previous evaluation, there have been no changes to the Iowa Non-MSA assessment area delineation.

The assessment area is comprised of 13 total census tracts. Based on 2024 FFIEC census data and 2016-2020 ACS data, the assessment area consists of three moderate-, nine middle-, and one upper-income census tract. There are no low-income census tracts in the Iowa Non-MSA assessment area. Additionally, three of the nine middle-income census tracts located within Iowa Non-MSA assessment area are designated underserved due to their remote and rural nature.

The bank operates its main office, three branches and five cash-only ATMs (one stand-alone ATM) within the assessment area. The bank has not opened or closed any branches in the Iowa Non-MSA assessment area since the previous evaluation. The bank operates two branches in moderate-income census tracts and two branches in middle-income census tracts.

The FDIC Deposit Market Share Report, dated June 30, 2024, ranked CBI Bank & Trust second among ten FDIC-insured institutions operating in the assessment area. The bank holds a 25.5 percent market share which is below the market leader MidWestOne Bank (Iowa City, Iowa) at 30.2 percent and above third-ranked Community Bank and Trust Company (Muscatine, Iowa) at 18.0 percent.

CBI Bank & Trust ranked first out of 104 aggregate lenders for 2024 HMDA-reportable transactions with a total of 145 originations. MidWestOne Bank ranked second with 134 reported originations followed by GreenState Credit Union which reported 113 originations. The market is highly competitive with large national lenders for HMDA-reportable loans with CBI Bank & Trust maintaining a strong presence. Additional assessment area demographic information is provided in the following table.

2024 IA Non MSA AA 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	2,691	19.0
Moderate	3	23.1	3,232	22.8	589	18.2	2,642	18.6
Middle	9	69.2	9,757	68.8	566	5.8	3,145	22.2
Upper	1	7.7	1,186	8.4	0	0.0	5,697	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13**	**100.0**	**14,175**	**100.0**	**1,155**	**8.1**	**14,175**	**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	5,186	3,006	19.2	58.0	1,690	32.6	490	9.4
Middle	15,947	11,035	70.6	69.2	3,194	20.0	1,718	10.8
Upper	2,129	1,584	10.1	74.4	377	17.7	168	7.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**23,262**	**15,625**	**100.0**	**67.2**	**5,261**	**22.6**	**2,376**	**10.2**
	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	447	22.2	386	21.3	58	34.5	3	8.3
Middle	1,422	70.7	1,284	71.0	105	62.5	33	91.7
Upper	143	7.1	138	7.6	5	3.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,012**	**100.0**	**1,808**	**100.0**	**168**	**100.0**	**36**	**100.0**
Percentage of Total Businesses:				**89.9**		**8.3**		**1.8**
	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	4	1.7	4	1.7	0	0.0	0	0.0
Middle	231	95.5	228	95.4	2	100.0	1	100.0
Upper	7	2.9	7	2.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**242**	**100.0**	**239**	**100.0**	**2**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**0.8**		**0.4**

Source: *2024 FFIEC Census Data*
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Population Characteristics

The Iowa Non-MSA assessment area population (54,072) experienced a slight decline from 2015 to 2020 with a decrease of 0.2 percent. Both counties in the assessment area were below the percentage increase in the state of Iowa (3.1 percent) during the same period with Muscatine County increasing slightly at 0.8 percent and Louisa County experiencing a population decline of 3.9 percent. A community representative stated that population in the area remains relatively stable; however, the population is aging, which could be a contributing factor to the slight decline. Additionally, it was noted that there is a lack of housing available in the communities preventing the area from growing. The decline in population in Louisa County can be attributed to its rural location.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change (%)**
Assessment Area	54,184	54,072	-0.2
Louisa County, IA	11,271	10,837	-3.9
Muscatine County, IA	42,913	43,235	0.8
Non-MSA Iowa	1,250,756	1,232,642	-1.4
Iowa	3,093,526	3,190,369	3.1
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

Income Characteristics

The assessment area is comprised of 14,175 families, of which 19.0 percent are designated as low-income, 18.6 percent are moderate-income, 22.2 percent are middle-income, and 40.2 percent are upper-income. Further, 8.2 percent of families residing within the assessment area live below the poverty line, consistent with the state of Iowa's poverty rate of 7.1 percent. According to the 2016-2020 ACS, the MFI for the assessment area is $71,857 which remains below the MFI for the state of Iowa ($79,186). A community representative noted that a large portion of the area workforce commutes to Muscatine County from the surrounding areas, including from Louisa County. The representative estimated that roughly half of the employment in Muscatine County is from commuters, which could contribute to Muscatine County's MFI being below that of neighboring Louisa County, as some higher-income individuals may work in Muscatine, but live in Louisa County.

Median Family Income Change			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percent Change (%)
Assessment Area	68,084	71,857	5.5
Louisa County, IA	65,629	74,684	13.8
Muscatine County, IA	70,016	71,787	2.5
Non-MSA Iowa	67,391	71,763	6.5
Iowa	73,712	79,186	7.4
Source: 2011 - 2015 and 2016 -2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

There is a total of 23,262 housing units within the assessment area. The majority of housing units are owner-occupied (67.2 percent), followed by rental units (22.6 percent) and vacant housing units (10.2 percent). The number of vacant units within the assessment area is slightly higher than the number of vacant units within the state of Iowa (9.5 percent). According to the 2016-2020 ACS, the assessment area had a median housing value of $129,657 and median gross rent of $792. The counties that comprise the assessment area were both below the state of Iowa with respect to housing value trends from 2015-2020.

Households are considered housing burdened when their gross monthly housing costs in relation to gross monthly income is 30.0 percent or above. As shown in the following table, large percentages of low-income households, whether they are renters or homeowners, are cost burdened; however, moderate-income owners in the assessment area and Muscatine County are burdened at a rate consistent with residents in the state of Iowa. In Louisa County, moderate-income renters and owners are less cost-burdened when compared to Muscatine County due to a combination of lower rental rates, lower median property values, and a high rate of homeownership. Louisa County's more rural, lower-cost environment offers higher affordability for its residents compared to Muscatine County.

According to FFIEC HMDA loan and application records, home mortgage trends reflect decreases in home mortgage activity in recent years across the assessment area counties and the broader region. These trends suggest a continued decrease in demand for home purchases as home values continue to increase, indicating that housing cost burden for low- and moderate-income homeowners will remain elevated.

A community representative noted that the most pressing need for the assessment area is an increase in housing of all types. The representative cited a recent housing study indicating the need for an additional 3000 housing units in Muscatine County. The representative noted that as the population continues to age, senior housing will increasingly be a challenge. Additionally, they also mentioned that roughly a quarter of Muscatine County residents are renters, which, on average, earn less than half of the homeowners in the county. Contributing to the issue, a small portion of rental housing units were constructed post-2000 which may not align with expectations of contemporary renters. Because of this, the representative indicated that housing affordability is an even more pressing issue amongst renters in the community.

The following table shows the percentage of renters and owners who experience a cost burden within the assessment area.

Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	70.5%	20.5%	32.7%	68.1%	25.1%	16.0%
Louisa County, IA	67.4%	12.0%	25.6%	56.1%	13.7%	13.5%
Muscatine County, IA	71.0%	22.2%	34.1%	71.9%	27.6%	16.7%
Non-MSA Iowa	65.8%	16.7%	33.2%	54.8%	18.9%	14.2%
Iowa	71.9%	21.4%	37.9%	58.7%	23.5%	14.9%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Employment Conditions

Unemployment rates for the assessment area and the state of Iowa steadily declined post-pandemic from 2020-2022 with modest upward trends in 2023 and 2024. The unemployment rates for Louisa and Muscatine counties in 2024 were consistent with the state of Iowa's unemployment rate of 3.0 percent. A community representative noted that unemployment in the area has decreased to pre-pandemic levels. As previously mentioned, the representative indicated a large portion of the Muscatine County workforce are commuters from surrounding counties, which could contribute to the higher unemployment rate in Muscatine County as many jobs are taken by residents of surrounding counties, such as Lousia County. Louisa County's unemployment rate is lower than Muscatine County due to its smaller labor force and its concentration in agriculture and food production manufacturing related jobs. Conversely, Muscatine County has a much larger and broader industrial base making its unemployment rate more sensitive to industry downturns and fluctuations. The following table presents the unemployment trends for the assessment area and the state of Iowa from 2020 to 2024.

Unemployment Rates					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	5.6%	4.2%	3.1%	3.1%	3.4%
Louisa County, IA	5.1%	4.1%	3.3%	3.2%	3.1%
Muscatine County, IA	5.7%	4.2%	3.0%	3.1%	3.5%
Non-MSA Iowa	4.9%	3.8%	3.0%	3.0%	3.0%
Iowa	5.2%	3.9%	2.8%	2.9%	3.0%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Industry Characteristics

Major employers in the assessment area include manufacturing, government agencies, retail trade, health care, and food service. In addition to these major employers, Dun & Bradstreet data indicate there were 2,012 businesses and 242 farms located within the assessment area in 2024, and the majority (89.9 percent and 98.8 percent, respectively) had revenues of $1 million or less. The community representative indicated that there have not been any notable changes to the industry composition of the assessment area.

Community Representatives

One community representative was contacted to provide information regarding local economic and demographic conditions. The community representative stated that population remains relatively stable despite some slight declines attributed to an aging population. Employment in the assessment area is relatively strong, with Muscatine County unemployment being slightly higher due to the commuter population working in the county. Additionally, housing of all types is a pressing need for the area, especially senior and affordable housing. Lastly, the representative noted that investment in existing housing stock, expansion of homeowner resources, and the creation of intentional housing developments present opportunities for involvement for local financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA NON-MSA

LENDING TEST

CBI Bank & Trust's performance in the Iowa Non-MSA assessment area reflects excellent geographic dispersion of lending throughout the assessment area and reasonable penetration among borrowers of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

Geographic Distribution of Loans

CBI Bank & Trust demonstrates excellent geographic distribution of loans given its assessment area. An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly one moderate-income census tract. The bank's assessment area consists of three moderate-income, nine middle-income, and one upper-income census tract. There are no low-income census tracts in the assessment area; therefore, geographic distribution analysis is focused on the bank's lending in moderate-income census tracts. CBI Bank & Trust originated loans in all 13 census tracts in the assessment area during the review period. Additionally, the bank originated nine loans in two of the three underserved middle-income census tracts. Based upon this analysis, there are no conspicuous geographic lending gaps.

<u>HMDA-Reportable Loans</u>

Geographic distribution of HMDA-reportable loans reflects excellent penetration throughout the assessment area. In 2024, CBI Bank & Trust originated 37.1 percent of HMDA-reportable loans in

moderate-income census tracts by number which was significantly higher than aggregate lender performance (22.5 percent) and the percentage of owner-occupied units in the same tracts (19.2). The bank originated 49.2 percent of HMDA-reportable loans in middle-income census tracts which was below both aggregate lender performance (63.8 percent) and the percentage of owner-occupied units in middle-income census tracts (70.6 percent) Lastly, 13.6 percent of HMDA-reportable loans were originated in upper-income census tracts which was comparable to aggregate lenders (13.7 percent) and above the percentage of owner-occupied units located in those tracts (10.1 percent).

Geographic distribution of 2023 HMDA-reportable loans was comparable to that of 2024.

Home Purchase

CBI Bank & Trust originated 42.1 percent of its HMDA-reportable home purchase loans in moderate-income census tracts. This was significantly above aggregate lender performance (24.4 percent) and the percentage of owner-occupied units in the same tracts (16.9 percent). The bank originated 44.7 percent by number of HMDA-reportable home purchase loans in middle-income census tracts which was significantly below both aggregate lender performance (62.0 percent) and the percentage of owner-occupied units in those same tracts (70.6 percent). CBI Bank & Trust originated 13.2 percent of HMDA-reportable home purchase loans by number in the sole upper-income census tract which was comparable to aggregate lender performance (13.6 percent) and just above the percentage of owner-occupied units in the upper-income census tract (10.1 percent).

Performance in 2023 was consistent with 2024.

Refinance

CBI Bank & Trust originated 32.1 percent of its HMDA-reportable refinance loans in moderate-income census tracts. This was significantly above aggregate lender performance (15.7 percent) and the percentage of owner-occupied units in the same tracts (19.2 percent). The bank originated 50.0 percent of its HMDA-reportable refinance loans by number in middle-income tracts which was significantly below both aggregate lender performance (69.9 percent) and the percentage of owner-occupied units in those same tracts (70.6 percent). A total of 17.9 percent of HMDA-reportable refinance loans by number were made in the sole upper-income census tract which was above aggregate lender performance (14.4 percent) and above the percentage of owner-occupied units in the upper-income census tract (10.1 percent).

Performance in 2023 was comparable to that of 2024. Lending performance in 2023 exceeded both the aggregate lenders performance and the percentage of owner-occupied units located in moderate-income census tracts.

Home Improvement

CBI Bank & Trust originated 23.1 percent of its HMDA-reportable home improvement loans in moderate-income census tracts, which exceeded both the aggregate (17.1) percent and the 19.2 percentage of owner-occupied units in the same tracts (19.2 percent). The bank originated 65.4 percent of its home improvement loans in middle-income census tracts, which was below both aggregate (72.4 percent) and the percentage of owner-occupied units (70.6 percent). In the upper-income tract, the bank originated 11.5 percent, consistent with the aggregate peer lending and the percentage of owner-occupied units, at 10.5 percent and 10.1 percent, respectively.

Performance in the moderate- and middle-income tracts for 2023 was consistent with 2024 lending. Lending to the upper-income tract exceeded performance in 2024.

The following table presents CBI Bank & Trust's 2023 and 2024 geographic distribution of HMDA-reportable loans in the assessment area.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: IA Non MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	29	35.4	24.5	2,437	22.2	18.8	32	42.1	24.4	3,226	29.1	16.9	19.2
Middle	42	51.2	64.1	5,880	53.4	64.7	34	44.7	62.0	5,656	51.0	63.7	70.6
Upper	11	13.4	11.4	2,685	24.4	16.4	10	13.2	13.6	2,219	20.0	19.4	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	82	100.0	100.0	11,002	100.0	100.0	76	100.0	100.0	11,101	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	26.7	19.5	306	17.2	12.7	9	32.1	15.7	415	18.2	10.6	19.2
Middle	18	60.0	65.9	1,023	57.4	64.4	14	50.0	69.9	1,418	62.1	74.9	70.6
Upper	4	13.3	14.6	453	25.4	22.8	5	17.9	14.4	452	19.8	14.5	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	1,782	100.0	100.0	28	100.0	100.0	2,285	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	20.0	21.2	83	5.7	13.9	6	23.1	17.1	202	18.7	12.7	19.2
Middle	12	48.0	63.6	958	65.7	69.4	17	65.4	72.4	718	66.5	75.7	70.6
Upper	8	32.0	15.2	417	28.6	16.8	3	11.5	10.5	160	14.8	11.6	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	1,458	100.0	100.0	26	100.0	100.0	1,080	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	50.0	83	5.5	27.7	2	100.0	62.5	342	100.0	42.8	25.2
Middle	3	60.0	43.8	1,355	90.5	71.6	0	0.0	37.5	0	0.0	57.2	57.3
Upper	1	20.0	6.3	60	4.0	0.7	0	0.0	0.0	0	0.0	0.0	17.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,498	100.0	100.0	2	100.0	100.0	342	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	43	30.3	23.1	2,909	18.5	18.0	49	37.1	22.5	4,185	28.3	18.1	19.2
Middle	75	52.8	64.4	9,216	58.6	65.0	65	49.2	63.8	7,792	52.6	65.3	70.6
Upper	24	16.9	12.5	3,615	23.0	16.9	18	13.6	13.7	2,831	19.1	16.6	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	142	100.0	100.0	15,740	100.0	100.0	132	100.0	100.0	14,808	100.0	100.0	100.0

Source: 2024 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 Loans

Geographic distribution of small business loans reflects excellent penetration throughout the assessment area. In 2024, CBI Bank & Trust originated 60.0 percent of small business loans in moderate-income census tracts in the assessment area which was significantly above the percentage of assessment area small businesses located in moderate-income census tracts (22.2 percent). A total of 36.0 percent of small business loans by number were originated in middle-income tracts which was significantly below the percentage of assessment area small businesses located in middle-income census tracts (70.7 percent). Lastly, small business lending in the sole upper-income census tract (4.0 percent) was slightly below the total businesses in this tract (7.1 percent).

The following table presents the geographic distribution of small business loans in the assessment area in 2024.

Distribution of 2024 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	15	60.0	2,344	57.7	22.2
Middle	9	36.0	1,665	41.0	70.7
Upper	1	4.0	53	1.3	7.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	25	100.0	4,062	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

Geographic distribution of small farm loans reflects reasonable penetration throughout the assessment area. In 2024, CBI Bank & Trust originated one small farm loan (3.8 percent) in a moderate-income census tract which was above the percentage of assessment area small farms located in the same tracts (1.7 percent). While there was limited small farm lending volume, performance is considered reasonable given the limited number of farms located in moderate-income census tracts (four total farms). The bank originated 92.3 percent of small farm loans in middle-income census tracts which was consistent with the percentage of small farms located in the same tracts (95.5 percent). Lastly, 3.8 percent of small farm loans were originated in the sole upper-income census tract in the assessment area which was comparable to the percentage of small farms located in that same tract (2.9 percent).

The following table presents the geographic distribution of small farm loans in the assessment area in 2024.

Distribution of 2024 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	1	3.8	96	3.3	1.7
Middle	24	92.3	2,646	89.9	95.5
Upper	1	3.8	200	6.8	2.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	26	100.0	2,942	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

CBI Bank & Trust demonstrates a reasonable distribution of loans to and, as appropriate, other lending related activities for individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment area. Given the bank's overall business strategy in the assessment area, small business and small farm lending performance carried more weight in the overall conclusion.

<u>HMDA-Reportable Loans</u>

The distribution of HMDA-reportable loans reflects excellent penetration among borrowers of different income levels. In 2024, CBI Bank & Trust originated 7.7 percent of total HMDA-reportable loans by number to low-income borrowers which was consistent with aggregate lender performance (8.0 percent), but significantly below the percentage of low-income families in the assessment area (19.0 percent). A total of 28.5 percent of HMDA-reportable loans by number were originated to moderate-income borrowers, which exceeded both the aggregate lender performance (23.9 percent) and the percentage of moderate-income families in the assessment area (18.6 percent). The bank originated 19.2 percent of HMDA-reportable loans by number to middle-income borrowers, which was below aggregate performance (24.0 percent), but comparable to the percentage of middle-income families in the assessment area (22.2 percent). The bank originated 30.0 percent of HMDA-reportable loans to upper-income borrowers which was comparable to aggregate lender performance (29.2 percent), but below the percentage of upper-income families in the assessment area (40.2 percent). Lastly, the bank originated 14.6 percent of HMDA-reportable loans to borrowers of unknown income compared to aggregate lender performance of 15.0 percent. The substantial majority of these HMDA-reportable loans were made to businesses; therefore, income information was not collected.

In 2023, borrower distribution of HMDA-reportable loans was consistent with lending performance in 2024. The bank's primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low origination volumes.

Home Purchase

CBI Bank & Trust originated 9.2 percent of its HMDA-reportable home purchase loans by number to low-income borrowers in 2024, which was consistent with aggregate lender performance (7.3 percent), but significantly below the percentage of low-income families in the assessment area (19.0 percent). A total of 31.6 percent of HMDA-reportable home purchase loans by number were originated to moderate-income borrowers, which exceeded aggregate lender performance (24.8 percent) and significantly exceeded the percentage of moderate-income families in the assessment area (18.6 percent). The bank originated 17.1 percent of home purchase loans by number to middle-income borrowers. This was below aggregate lender performance (23.9 percent) as well as the percentage of middle-income families in the assessment area (22.2 percent). A total of 19.7 percent of home purchase loans by number were originated to upper-income borrowers which was below aggregate lender performance (24.6 percent) and significantly below the percentage of upper-income families in the assessment area. Lastly, 22.4 percent of home purchase loans by number were originated to borrowers of unknown income compared to aggregate lender performance of 19.4 percent.

Borrower distribution of HMDA-reportable home purchase loans in 2023 was comparable to that of 2024.

Refinance

CBI Bank & Trust originated 7.1 percent by number of HMDA-reportable refinance loans to low-income borrowers which was consistent with aggregate lender performance (7.4 percent), but significantly below the percentage of low-income families in the assessment area (19.0 percent). The bank originated 21.4 percent of refinance loans to moderate-income borrowers which was consistent with both aggregate lender performance (22.3 percent) and the percentage of moderate-income families in the assessment area. The bank originated 14.3 percent of refinance loans by number to middle-income borrowers, which was below both aggregate lender performance (22.3 percent) and the percentage of middle-income families in the assessment area. The bank originated 53.6 percent of refinance loans by number to upper-income borrowers which was significantly above aggregate lender performance (34.5 percent) and the percentage of upper-income borrowers in the assessment area. Lastly, 3.6 percent of refinance loans were made to borrowers of unknown income, compared to the 13.5 percent aggregate lender performance.

Borrower distribution of HMDA-reportable refinance loans in 2023 exceeded performance in 2024. The following table presents the 2023 and 2024 borrower distribution of HMDA-reportable loans in the assessment area.

Home Improvement

CBI Bank & Trust originated 3.8 percent by number of HMDA-reportable home improvement loans to low-income borrowers which was below the aggregate lender performance (9.5 percent), and significantly below the percentage of low-income families in the assessment area (19.0 percent). However, 26.9 percent of the bank's home improvement loans were originated to moderate-income borrowers which was consistent with aggregate lender performance (25.7 percent) and exceeded the 18.6 percent of moderate-income families in the assessment area. The bank originated 30.8 percent of home improvement loans by number to middle-income borrowers, which exceeded both aggregate lender performance (26.7 percent) and the percentage of middle-income families in the assessment area (22.2 percent). The bank originated 34.6 percent of the home improvement loans by number to upper-income borrowers which was consistent with aggregate lender performance (32.4 percent) but below the percentage of upper-income borrowers in the assessment area at 40.2 percent. Lastly, 3.8 percent of refinance loans were made to borrowers with unknown-incomes compared to 5.7 percent aggregate lender performance.

Borrower distribution of HMDA-reportable home improvement loans in 2023 exceeded performance in 2024. Primarily, lending to borrowers of low-income exceeded the performance of aggregate peers. The following table presents the 2023 and 2024 borrower distribution of HMDA-reportable loans in the assessment area.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: IA Non MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	16	19.5	10.5	909	8.3	5.2	7	9.2	7.3	817	7.4	3.9	19.0
Moderate	18	22.0	22.5	2,328	21.2	18.1	24	31.6	24.8	2,849	25.7	18.5	18.6
Middle	15	18.3	22.1	2,251	20.5	22.4	13	17.1	23.9	1,854	16.7	21.9	22.2
Upper	17	20.7	21.7	3,809	34.6	31.1	15	19.7	24.6	3,639	32.8	34.4	40.2
Unknown	16	19.5	23.2	1,705	15.5	23.1	17	22.4	19.4	1,942	17.5	21.2	0.0
Total	82	100.0	100.0	11,002	100.0	100.0	76	100.0	100.0	11,101	100.0	100.0	100.0
Refinance Loans													
Low	2	6.7	9.8	36	2.0	5.0	2	7.1	7.4	41	1.8	4.0	19.0
Moderate	14	46.7	26.3	742	41.6	20.5	6	21.4	22.3	357	15.6	17.2	18.6
Middle	5	16.7	24.4	266	14.9	22.9	4	14.3	22.3	376	16.5	20.7	22.2
Upper	4	13.3	31.7	480	26.9	42.4	15	53.6	34.5	1,300	56.9	35.8	40.2
Unknown	5	16.7	7.8	258	14.5	9.3	1	3.6	13.5	211	9.2	22.3	0.0
Total	30	100.0	100.0	1,782	100.0	100.0	28	100.0	100.0	2,285	100.0	100.0	100.0
Home Improvement Loans													
Low	4	16.0	12.1	107	7.3	5.0	1	3.8	9.5	43	4.0	5.1	19.0
Moderate	6	24.0	22.2	236	16.2	17.1	7	26.9	25.7	276	25.6	23.6	18.6
Middle	4	16.0	19.2	87	6.0	16.1	8	30.8	26.7	313	29.0	25.3	22.2
Upper	9	36.0	33.3	854	58.6	47.4	9	34.6	32.4	393	36.4	38.8	40.2
Unknown	2	8.0	13.1	174	11.9	14.4	1	3.8	5.7	55	5.1	7.1	0.0
Total	25	100.0	100.0	1,458	100.0	100.0	26	100.0	100.0	1,080	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	22	16.1	10.6	1,052	7.4	5.5	10	7.7	8.0	901	6.2	4.1	19.0
Moderate	38	27.7	23.3	3,306	23.2	18.2	37	28.5	23.9	3,482	24.1	18.7	18.6
Middle	24	17.5	23.2	2,604	18.3	22.4	25	19.2	24.0	2,543	17.6	21.9	22.2
Upper	30	21.9	25.8	5,143	36.1	34.1	39	30.0	29.2	5,332	36.9	35.2	40.2
Unknown	23	16.8	17.1	2,137	15.0	19.8	19	14.6	15.0	2,208	15.3	20.2	0.0
Total	137	100.0	100.0	14,242	100.0	100.0	130	100.0	100.0	14,466	100.0	100.0	100.0

Source: 2024 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 Loans

The borrower distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. In 2024, CBI Bank & Trust originated 84.0 percent of small

business loans by number to businesses with revenues of $1 million or less compared to the percentage of total businesses in the assessment area with annual revenues of $1 million or less (89.9 percent). Of the 21 loans made to small businesses with revenues of $1 million or less, 66.7 percent by number were in amounts of $100,000 or less which are generally considered most beneficial to the financing needs of small business borrowers.

The following table summarizes the bank's 2024 small business lending in the assessment area.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: IA Non MSA					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	21	84.0	1,976	48.6	89.9
Over $1 Million	4	16.0	2,087	51.4	8.3
Revenue Unknown	0	0.0	0	0.0	1.8
Total	25	100.0	4,062	100.0	100.0
By Loan Size					
$100,000 or Less	14	56.0	426	10.5	
$100,001 - $250,000	8	32.0	1,725	42.5	
$250,001 - $1 Million	3	12.0	1,912	47.1	
Total	25	100.0	4,062	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	14	66.7	426	21.6	
$100,001 - $250,000	7	33.3	1,550	78.4	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	21	100.0	1,976	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

The borrower distribution of small farm loans reflects reasonable penetration among farms of different revenue sizes. In 2024, CBI Bank & Trust originated 92.3 percent of small farm loans by number to farms with revenues of $1 million or less compared to the percentage of total farms in the assessment area with annual revenues of $1 million or less (98.8 percent). Of the 24 loans made to small farms with revenue under $1 million, 58.3 percent by number were in amounts of $100,000 or less which is generally considered most beneficial to the financing needs of small farm borrowers. The following table summarizes the bank's 2024 small farm lending in the assessment area.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: IA Non MSA					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	24	92.3	2,652	90.1	98.8
Over $1 Million	2	7.7	290	9.9	0.8
Revenue Unknown	0	0.0	0	0.0	0.4
Total	26	100.0	2,942	100.0	100.0
By Loan Size					
$100,000 or Less	14	53.8	578	19.6	
$100,001 - $250,000	9	34.6	1,417	48.2	
$250,001 - $500,000	3	11.5	947	32.2	
Total	26	100.0	2,942	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	14	58.3	578	21.8	
$100,001 - $250,000	7	29.2	1,127	42.5	
$250,001 - $500,000	3	12.5	947	35.7	
Total	24	100.0	2,652	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Lending, Investment, and Services Activities

CBI Bank & Trust demonstrates excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services.

Lending

CBI Bank & Trust originated 13 qualified community development loans for approximately $14.7 million which focused on affordable housing, economic development, and revitalization/stabilization in the assessment area during the evaluation period. The majority of the qualified community development loans by number were for the purpose of affordable housing in the assessment area, a need specifically identified by the community representative. By dollar amount, the majority of community development lending went towards revitalization/stabilization of the assessment area. Revitalization/stabilization activities included two loans for the construction and improvement of healthcare facilities in the assessment area. Specifically, one loan for $6.5 million went towards the improvement of an existing healthcare facility located in a moderate-income tract, while another loan for $5 million went towards the construction of another healthcare facility that will also be located in a moderate-income tract. Community development lending in this assessment substantially increased in lending by dollar amount from the previous evaluation where the bank made 11 qualified community development loans for $1.7 million.

Investment

CBI Bank & Trust made no new qualifying investments in this assessment area during the evaluation period. However, the bank maintained two qualified prior period investments with outstanding balances of approximately $1 million. Of the two qualified investments, one addresses affordable housing and one has the primary purpose of revitalization/stabilization of the assessment area. Despite no new investments, one of the prior period investments was not submitted at the prior exam leading to an overall increase in community development investments from the previous evaluation where the bank made one investment for $525,000. Additionally, the bank made 80 qualified community development donations for approximately $439,000 during this review period, including one large donation ($250,000) to help fund the aforementioned health clinic being constructed in a moderate-income census tract. The majority of donations (60) were made with the purpose of community services to organizations that primarily benefit low-and moderate-income individuals. The bank's performance presented a significant increase in community development donations from the previous exam where CBI Bank & Trust made 50 donations for approximately $128,000.

Services

During the evaluation period, CBI Bank & Trust staff served a total of 990.5 qualified hours with 11 different organizations provided community development services in the assessment area. Of the total service hours, the bank dedicated 457.5 hours to 16 organizations with a community service focus, and 96 hours were dedicated to organizations with an economic development focus. Additionally, 437 hours were dedicated to four organizations with an affordable housing focus which was a need specifically identified by the community representative in the assessment area. The bank's performance presents a slight decrease in total hours served from the previous evaluation, where bank staff provided 1,136 hours to nine organizations over a longer evaluation period of 41 months.

The following table presents the bank's community development activities in the assessment area during the review period.

Summary of Community Development Activities from July 19, 2022 – October 20, 2025 Assessment Area: IA Non MSA										
Type of Activity	**Affordable Housing**		**Economic Development**		**Revitalize and Stabilize**		**Community Service**		**Totals**	
	#	**$/Hours**	#	**$/Hours**	#	**$/Hours**	#	**$/Hours**	#	**$/Hours**
Lending	8	1,880,000	3	1,305,000	2	11,500,000	0	0	13	14,685,000
Investments	1	500,000	0	0	1	525,000	0	0	2	1,025,000
Donations	5	1,450	13	38,650	2	2600	60	396,555	80	439,255
Services	4	437	2	96	0	0	16	457.5	22	990.5

IOWA CITY, IA MSA #26980 – LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IOWA CITY, IA MSA

The Iowa City, IA MSA assessment area is comprised of 42 census tracts total including three low-income, 14 moderate-income, 13 middle-income, and 12 upper-income census tracts. The bank operates three branches and three cash-only ATMs within the Iowa City, IA MSA assessment area. Since the previous evaluation, the bank has not closed or opened any branches in the assessment area. The Iowa City, IA MSA assessment area delineation remains unchanged from the previous evaluation as the bank continues to designate Johnson and Washington counties in their entireties.

The FDIC Deposit Market Share Report, dated June 30, 2024, ranked CBI Bank & Trust 9th among 20 FDIC-insured institutions operating in the assessment area. During this time, the bank held approximately $97.1 million in deposits representing 1.7 percent market share, compared to the market leader Hills Bank and Trust Company (Hills, IA), which holds 43.5 percent (approximately $2.5 billion) of the assessment area's deposits.

CBI Bank and Trust ranked 14th out of 172 aggregate lenders in 2024 HMDA-reportable transactions in the assessment area. A total of 61 originations were reported by the bank compared to 1,590 reported by market leader GreenState Credit Union. The data is indicative of a saturated market with respect to HMDA reporters; however, CBI Bank & Trust is competing in the market with large national lenders, credit unions, and mortgage companies. Additional assessment area demographic information is provided in the following table. Please refer to appendix C for 2023 demographic information.

2024 Iowa City, IA MSA 26980 AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	3	7.1	914	2.3	434	47.5	8,083	20.7
Moderate	14	33.3	11,001	28.2	1,121	10.2	7,244	18.6
Middle	13	31.0	12,517	32.1	598	4.8	8,750	22.4
Upper	12	28.6	14,551	37.3	420	2.9	14,906	38.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**42**	**100.0**	**38,983**	**100.0**	**2,573**	**6.6**	**38,983**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,078	596	1.4	11.7	3,807	75.0	675	13.3
Moderate	23,534	9,891	23.8	42.0	11,833	50.3	1,810	7.7
Middle	23,443	14,429	34.8	61.5	7,508	32.0	1,506	6.4
Upper	22,623	16,596	40.0	73.4	4,646	20.5	1,381	6.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**74,678**	**41,512**	**100.0**	**55.6**	**27,794**	**37.2**	**5,372**	**7.2**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	459	7.3	421	7.2	37	9.8	1	1.6
Moderate	1,952	30.9	1,794	30.5	140	37.0	18	28.6
Middle	1,939	30.7	1,807	30.7	110	29.1	22	34.9
Upper	1,969	31.2	1,856	31.6	91	24.1	22	34.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6,319**	**100.0**	**5,878**	**100.0**	**378**	**100.0**	**63**	**100.0**
Percentage of Total Businesses:				**93.0**		**6.0**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	111	23.2	110	23.3	1	16.7	0	0.0
Middle	262	54.7	256	54.2	5	83.3	1	100.0
Upper	105	21.9	105	22.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**479**	**100.0**	**472**	**100.0**	**6**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.5**		**1.3**		**0.2**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IOWA CITY, IA MSA

Assessment Area	Lending Test	Community Development Test
Iowa City, IA MSA #26980	Consistent	Consistent

CBI Bank & Trust’s lending performance in the Iowa City, IA MSA assessment area is consistent with the institution’s satisfactory lending performance in the state of Iowa. Community development performance in the Iowa City, IA MSA assessment area is consistent with the institution’s outstanding community development performance in the state of Iowa. The bank’s performance in the Iowa City, IA MSA does not impact the overall rating for the state of Iowa. Please see the following lending and community development tables for more details.

LENDING TEST

Geographic Distribution of Loans

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Iowa City, IA MSA 26980

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	4.4	1.8	299	3.7	1.5	0	0.0	1.6	0	0.0	1.3	1.4
Moderate	18	40.0	26.3	2,849	34.9	20.7	5	16.1	24.0	522	5.5	18.9	23.8
Middle	14	31.1	36.4	2,446	30.0	34.8	14	45.2	39.6	3,587	38.0	37.3	34.8
Upper	11	24.4	35.5	2,569	31.5	42.9	12	38.7	34.8	5,331	56.5	42.4	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	8,163	100.0	100.0	31	100.0	100.0	9,440	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.3	0	0.0	1.8	1	4.3	0.5	231	6.7	0.6	1.4
Moderate	7	53.8	22.1	538	51.4	15.5	9	39.1	17.3	1,322	38.3	11.6	23.8
Middle	4	30.8	39.2	229	21.9	34.8	7	30.4	41.3	459	13.3	34.8	34.8
Upper	2	15.4	37.5	279	26.7	47.9	6	26.1	41.0	1,437	41.7	53.0	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,046	100.0	100.0	23	100.0	100.0	3,449	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	1.0	0	0.0	1.0	1.4
Moderate	1	11.1	21.8	52	14.1	17.7	2	50.0	22.4	50	16.7	19.3	23.8
Middle	6	66.7	40.4	202	54.7	33.4	1	25.0	34.4	100	33.3	30.3	34.8
Upper	2	22.2	37.5	115	31.2	48.7	1	25.0	42.2	150	50.0	49.4	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	369	100.0	100.0	4	100.0	100.0	300	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.8	0	0.0	4.3	0	0.0	11.1	0	0.0	3.1	20.2
Moderate	1	33.3	29.3	150	21.1	59.7	0	0.0	51.1	0	0.0	48.3	43.0
Middle	1	33.3	31.7	500	70.4	20.7	0	0.0	24.4	0	0.0	37.4	20.0
Upper	1	33.3	29.3	60	8.5	15.3	0	0.0	13.3	0	0.0	11.2	16.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	710	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	2.9	1.7	299	2.9	2.0	1	1.7	1.4	231	1.8	1.3	1.4
Moderate	27	38.6	24.8	3,589	34.9	25.4	16	27.6	22.0	1,894	14.4	19.0	23.8
Middle	25	35.7	37.1	3,377	32.8	32.7	22	37.9	39.4	4,146	31.4	36.6	34.8
Upper	16	22.9	36.3	3,023	29.4	39.9	19	32.8	37.2	6,918	52.5	43.1	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	70	100.0	100.0	10,288	100.0	100.0	58	100.0	100.0	13,189	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Iowa City, IA MSA 26980					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	7.3
Moderate	3	33.3	1,065	40.3	30.9
Middle	3	33.3	190	7.2	30.7
Upper	3	33.3	1,384	52.4	31.2
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	9	100.0	2,640	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Iowa City, IA MSA 26980					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.2
Moderate	6	40.0	1,013	51.9	23.2
Middle	9	60.0	940	48.1	54.7
Upper	0	0.0	0	0.0	21.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	15	100.0	1,953	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Iowa City, IA MSA 26980													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	8.9	13.1	391	4.8	7.4	2	6.5	7.5	152	1.6	3.9	20.7
Moderate	5	11.1	21.1	994	12.2	16.4	2	6.5	18.9	274	2.9	13.5	18.6
Middle	10	22.2	18.6	1,942	23.8	19.1	4	12.9	19.0	959	10.2	17.7	22.4
Upper	5	11.1	19.6	1,309	16.0	27.6	15	48.4	27.5	6,579	69.7	36.9	38.2
Unknown	21	46.7	27.6	3,527	43.2	29.5	8	25.8	27.0	1,476	15.6	28.0	0.0
Total	45	100.0	100.0	8,163	100.0	100.0	31	100.0	100.0	9,440	100.0	100.0	100.0
Refinance Loans													
Low	4	30.8	18.7	108	10.3	11.6	5	21.7	9.2	276	8.0	3.8	20.7
Moderate	1	7.7	22.7	31	3.0	15.1	4	17.4	17.9	448	13.0	10.3	18.6
Middle	2	15.4	23.0	120	11.5	19.2	3	13.0	20.1	400	11.6	14.9	22.4
Upper	3	23.1	22.9	214	20.5	34.1	6	26.1	33.3	2,064	59.8	43.6	38.2
Unknown	3	23.1	12.7	573	54.8	19.9	5	21.7	19.5	261	7.6	27.4	0.0
Total	13	100.0	100.0	1,046	100.0	100.0	23	100.0	100.0	3,449	100.0	100.0	100.0
Home Improvement Loans													
Low	3	33.3	14.1	150	40.7	8.9	0	0.0	8.0	0	0.0	5.1	20.7
Moderate	0	0.0	23.7	0	0.0	16.9	1	25.0	18.0	10	3.3	14.5	18.6
Middle	3	33.3	23.1	60	16.3	21.4	0	0.0	28.8	0	0.0	21.0	22.4
Upper	3	33.3	31.8	159	43.1	43.9	2	50.0	40.1	190	63.3	49.1	38.2
Unknown	0	0.0	7.3	0	0.0	8.9	1	25.0	5.1	100	33.3	10.3	0.0
Total	9	100.0	100.0	369	100.0	100.0	4	100.0	100.0	300	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	11	16.4	14.2	649	6.8	8.0	7	12.1	8.3	428	3.2	4.0	20.7
Moderate	6	9.0	21.7	1,025	10.7	16.3	7	12.1	18.7	732	5.6	12.9	18.6
Middle	15	22.4	20.4	2,122	22.2	19.3	7	12.1	20.4	1,359	10.3	17.3	22.4
Upper	11	16.4	21.8	1,682	17.6	29.4	23	39.7	30.1	8,833	67.0	38.7	38.2
Unknown	24	35.8	21.9	4,100	42.8	27.1	14	24.1	22.5	1,837	13.9	27.1	0.0
Total	67	100.0	100.0	9,578	100.0	100.0	58	100.0	100.0	13,189	100.0	100.0	100.0

Source: *2024 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.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Iowa City, IA MSA 26980					
	Bank Loans				**Total Businesses %**
	#	**#%**	**$(000)**	**$%**	
By Revenue					
$1 Million or Less	8	88.9	1,640	62.1	93.0
Over $1 Million	1	11.1	1,000	37.9	6.0
Revenue Unknown	0	0.0	0	0.0	1.0
Total	9	100.0	2,640	100.0	100.0
By Loan Size					
$100,000 or Less	6	66.7	291	11.0	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $1 Million	3	33.3	2,349	89.0	
Total	9	100.0	2,640	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	6	75.0	291	17.7	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $1 Million	2	25.0	1,349	82.3	
Total	8	100.0	1,640	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Iowa City, IA MSA 26980					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	13	86.7	1,414	72.4	98.5
Over $1 Million	2	13.3	540	27.6	1.3
Revenue Unknown	0	0.0	0	0.0	0.2
Total	15	100.0	1,953	100.0	100.0
By Loan Size					
$100,000 or Less	8	53.3	244	12.5	
$100,001 - $250,000	5	33.3	910	46.6	
$250,001 - $500,000	2	13.3	800	41.0	
Total	15	100.0	1,953	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	7	53.8	204	14.4	
$100,001 - $250,000	5	38.5	910	64.4	
$250,001 - $500,000	1	7.7	300	21.2	
Total	13	100.0	1,414	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Summary of Community Development Activities from July 19, 2022 – October 20, 2025 Assessment Area: Iowa City, IA MSA 26980										
Type of Activity	Affordable Housing		Economic Development		Revitalize and Stabilize		Community Service		Totals	
	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours
Lending	0	0	4	14,240,000	3	166,277	0	0	7	14,406,277
Investments	0	0	0	0	11	4,230,000	0	0	11	4,230,000
Donations	8	12,160	28	33,855	18	41,250	43	61,157	97	148,422
Services	2	96	6	185.5	0	0	13	391	21	672.5

STATE OF ILLINOIS

CRA RATING FOR ILLINOIS: Outstanding
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

CBI Bank & Trust is rated Outstanding in the state of Illinois based on reasonable geographic distribution of loans throughout the assessment areas and excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes. The bank also demonstrates excellent responsiveness to the needs of its assessment areas through community development loans, qualified investments, and community development services. This performance is appropriate, considering the bank's capacity, and the need and availability of such opportunities for community development in the bank's assessment areas.

SCOPE OF EXAMINATION

A full-scope review was conducted to evaluate the bank's Illinois Non-MSA assessment area, which includes Knox and Warren Counties in their entireties, and limited-scope reviews were conducted on the bank's Peoria, Illinois MSA and Rockford Illinois, MSA assessment areas. The scope for this assessment area is consistent with the overall scope presented in the Scope of Examination section of this performance evaluation except for the review period for HMDA-reportable loans in the Rockford, Illinois MSA. The Rockford, Illinois MSA was added to the bank's combined assessment area in October 2023 as a result of CBI Bank & Trust's acquisitions of six branches from SENB Bank. Due to this, conclusions for this limited-scope review were derived from HMDA-reportable lending based on the bank's 2024 performance. Please refer to the Scope of Examination section for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS

CBI Bank & Trust's operations in Illinois consists of the Illinois Non-MSA, Peoria, Illinois MSA, and Rockford, Illinois MSA assessment areas. The Illinois Non-MSA assessment area consists of the entireties of Knox and Warren Counties in Illinois. The Peoria, Illinois MSA assessment area consists of Peoria and Tazewell Counties in their entireties, and the Rockford, Illinois MSA assessment area consists of Winnebago County in its entirety. No branches in the state of Illinois are located in low- or moderate-income census tracts. Please refer to the individual assessment area summaries for demographic and economic conditions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

CBI Bank & Trust's performance relative to the lending test in the state of Illinois is **satisfactory** based on reasonable geographic distribution of loans throughout the assessment areas, and excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

Geographic and Borrower Distribution

CBI Bank & Trust's lending activities reflect reasonable distribution throughout the assessment areas within the state of Illinois. Additionally, the distribution of loans reflects reasonable penetration among borrowers of different income levels, including low- and moderate-income, and businesses and farms of different revenue sizes. Further discussion with respect to geographic and borrower distributions of lending can be found in the individual assessment area analyses.

COMMUNITY DEVELOPMENT TEST

Lending, Investments, and Services Activities

CBI Bank & Trust's community development activities are **outstanding**. The bank demonstrates excellent responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

The conclusions regarding the bank's lending, investment (including donations), and service activities within the state of Illinois are based on the analysis of the Illinois Non-MSA, assessment area. Please refer to the individual assessment area summary for support of the overall rating.

ILLINOIS NONMETROPOLITAN ASSESSMENT AREA– FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Illinois Non-MSA assessment area. The scope for this assessment area is consistent with the overall scope presented in the Scope of Examination section of this performance evaluation. Please refer to the Scope of Examination section for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS NON-MSA

The Illinois Non-MSA assessment area consists of Knox and Warren Counties in their entireties. The bank's assessment area remains unchanged since the previous evaluation.

The assessment area is comprised of 21 total census tracts. Based on 2024 FFIEC census data and 2016-2020 ACS data, the assessment area consists of three moderate-, 15 middle-, two upper-, and one unknown-income census tract. There are no low-income census tracts in the Illinois Non-MSA assessment area. Additionally, eleven middle-income census tracts within Knox County are designated as distressed due to high levels of unemployment.

The bank operates four branches and five cash-only ATMs (one stand-alone) within the assessment area. Since the previous evaluation, the bank opened an ATM in Galesburg, Illinois on the Knox College campus which is located in the unknown-income census tract. The bank operates three branches in middle-income census tracts and one in an unknown census tract.
The assessment area remains unchanged since the previous evaluation.

The FDIC Deposit Market Share Report dated June 30, 2024, ranked CBI Bank & Trust third among 16 FDIC-insured institutions operating in the assessment area. The bank holds an 11.6 percent market share, compared to market leaders Wells Fargo Bank, National Association (Sioux Falls, SD) and Midwest Bank (Monmouth, IL), which hold 36.7 percent and 13.7 percent of the assessment area's deposits, respectively.

CBI Bank & Trust ranked first out of 131 aggregate lenders in 2024 HMDA-reportable transactions. A total of 208 originations and purchase transactions were reported by the bank compared to 85 reported by Midwest Bank and 63 reported by Rocket Mortgage, LLC, who rank second and third in the market, respectively. The bank continues to maintain a strong presence although the market is highly competitive among lenders for HMDA-reportable loans with a large pool of national banks, credit unions and mortgage companies. Additional assessment area demographic information is provided in the following table. Please refer to Appendix C for 2023 demographic information.

2024 IL Non MSA AA 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	3,173	19.9
Moderate	3	14.3	1,447	9.1	267	18.5	3,022	18.9
Middle	15	71.4	13,081	82.0	1,272	9.7	3,625	22.7
Upper	2	9.5	1,315	8.2	45	3.4	6,132	38.4
Unknown	1	4.8	109	0.7	37	33.9	0	0.0
Total AA	**21**	**100.0**	**15,952**	**100.0**	**1,621**	**10.2**	**15,952**	**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	3,346	1,405	7.5	42.0	1,228	36.7	713	21.3
Middle	25,009	15,656	83.7	62.6	6,195	24.8	3,158	12.6
Upper	2,074	1,570	8.4	75.7	242	11.7	262	12.6
Unknown	1,144	73	0.4	6.4	848	74.1	223	19.5
Total AA	**31,573**	**18,704**	**100.0**	**59.2**	**8,513**	**27.0**	**4,356**	**13.8**
	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	184	9.2	146	8.2	36	20.7	2	4.3
Middle	1,468	73.3	1,324	74.3	105	60.3	39	84.8
Upper	117	5.8	108	6.1	7	4.0	2	4.3
Unknown	234	11.7	205	11.5	26	14.9	3	6.5
Total AA	**2,003**	**100.0**	**1,783**	**100.0**	**174**	**100.0**	**46**	**100.0**
Percentage of Total Businesses:				**89.0**		**8.7**		**2.3**
	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	2	0.8	2	0.8	0	0.0	0	0.0
Middle	200	76.6	198	76.7	2	66.7	0	0.0
Upper	59	22.6	58	22.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**261**	**100.0**	**258**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.9**		**1.1**		**0.0**

Source: *2024 FFIEC Census Data*
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Population Characteristics

The assessment area's population (66,802) experienced a decline in population (4.3 percent) from 2015 to 2020 which was consistent with population decline across non-MSA Illinois (4.6 percent). Warren County experienced the largest decline in population (4.9 percent) while the population for Knox County declined 4.1 percent. The state of Illinois slightly decreased (0.5 percent) during the same period. A community representative stated that the area has been experiencing a slow decline in population since 1980. They further noted the area is geographically well situated with access to larger metro areas while still maintaining a lower cost of living; however, the area does not have enough available housing to support population growth.

The table below presents population changes in the assessment area from 2015 to 2020.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change (%)**
Assessment Area	69,813	66,802	-4.3%
Knox County, IL	52,112	49,967	-4.1%
Warren County, IL	17,701	16,835	-4.9%
Non-MSA Illinois	1,713,509	1,635,249	-4.6%
Illinois	12,873,761	12,812,508	-0.5%
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

Income Characteristics

According to 2024 FFIEC Census data, the assessment area is comprised of 15,952 families of which 19.9 percent are designated as low-income, 18.9 percent are moderate-income, 22.7 percent are middle-income, and 38.4 percent are upper-income families. Further, 10.2 percent of families residing within the assessment area live below the poverty line, which is above the poverty rate for the state of Illinois (8.5 percent). According to the 2016-2020 ACS, the MFI for the assessment area is $66,114. Although this is significantly below the MFI for the state of Illinois ($86,251), the MFI percentages of change in both Knox and Warren Counties are outpacing the state of Illinois. The community representative attributed MFI in Knox County outpacing the state of Illinois to the opening of four new health clinics in the area in recent years that created more high-income jobs in the community.

Median Family Income Change			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percent Change (%)
Assessment Area	58,862	66,114	12.3
Knox County, IL	58,157	66,372	14.1
Warren County, IL	59,103	68,139	15.3
Non-MSA Illinois	64,255	67,835	5.6
Illinois	78,169	86,251	10.3
Source: 2011 - 2015 and 2016 -2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

There is a total of 31,573 housing units within the assessment area. The majority of housing units are owner-occupied (59.2 percent) followed by rental units (27.0 percent) and vacant units (13.8 percent). Vacant units within the assessment area are higher than that of the state of Illinois at 9.1 percent. According to 2024 FFIEC Census Data, the assessment area had a median housing value of $84,750 and a median gross rent of $620.

The housing cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs. As shown in the following table, large percentages of both low-income households, whether renters or homeowners, are housing cost burdened; however, moderate-income renters and homeowners in the assessment area are less cost-burdened compared to the state of Illinois. Moderate-income renters in Knox and Warren County have a much lower housing cost burden when compared to the state of Illinois. Warren County's low moderate-income renter housing cost burden is attributed to its small rural location, high level of home ownership, and lower cost of living.
A community representative indicated that the assessment area has a severely limited housing stock. Additionally, the existing stock is aged, adding to the deterioration in quality of housing in the area. They noted that housing is still relatively affordable in the assessment area and there is not necessarily a shortage of affordable housing, but rather affordable housing units are being occupied by those that are not low- and moderate-income individuals. Lastly, the representative stated that roughly half of new homebuyers in the area move from outside of the area.

The following table shows the percentage of renters and owners who are spending more than 30 percent of household income on housing costs.

Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	76.2%	12.7%	43.2%	51.0%	17.7%	13.9%
Knox County, IL	77.2%	15.5%	46.7%	48.2%	18.2%	13.9%
Warren County, IL	70.1%	4.0%	28.8%	59.9%	16.2%	13.9%
Non-MSA Illinois	66.3%	20.3%	36.6%	53.2%	18.4%	14.1%
Illinois	73.6%	34.6%	41.8%	67.0%	34.3%	20.8%
Cost Burden is housing cost that equals 30 percent or more of household income *Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*						

Employment Conditions

The unemployment rates for the assessment area and the state of Illinois steadily declined from 2020-2022 and then remained stable in 2023 and 2024. In 2024, the unemployment rates for the assessment area (5.1 percent) and Knox County (5.2 percent), the largest county in the assessment area, were consistent with that of the state of Illinois (5.0 percent). The lower unemployment rate in Warren County (4.6 percent) is attributed to its smaller labor force and its focus on agriculture. Converserly, while Knox County has a large healthcare sector, it is more reliant on manufacturing, retail, and transportation which are more sensitive to economic downturns. The community representative indicated that most employers in the area are experiencing shortages of workers, specifically white-collar and skilled blue-collar laborers such as transportation and machinists. Because of this, vocational education programs are an area of focus in the assessment area.

The following table presents the unemployment trends for the assessment area and the state of Illinois from 2020 to 2024.

Unemployment Rates					
Area	2020	2021	2022	2023	2024
Assessment Area	7.9%	6.2%	5.1%	5.1%	5.1%
Knox County, IL	8.5%	6.6%	5.4%	5.4%	5.2%
Warren County, IL	6.4%	5.0%	4.2%	4.3%	4.6%
Non-MSA Illinois	7.7%	5.3%	4.4%	4.7%	4.7%
Illinois	9.3%	6.1%	4.6%	4.5%	5.0%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Industry Characteristics

The assessment area's major industries include manufacturing, retail trade, and food services. In addition to these major employment industries, Dun & Bradstreet data indicate there were 2003 businesses and 261 farms located within the assessment area in 2024, and the majority (89.0) percent and 98.9 percent, respectively) had revenues of $1 million or less. A community representative stated that a lack of workforce remains a challenge. Additionally, there have not been any notable changes to the industry composition of the assessment area.

Community Representative

One community representative was contacted to provide information regarding local economic and demographic conditions. The representative indicated that the area has experienced a slow population decline, primarily attributed to the lack of available housing and the deterioration of existing housing stock. They noted that while housing is still relatively affordable in the area, there isn't enough housing to support growth. Additionally, they noted the area is experiencing a workforce shortage and for that reason vocational education is a focus for the assessment area and vocational education programs are seeing growth. Lastly, area MFI has increased substantially in recent years primarily due to the creation of higher-paying jobs through the opening of new health clinics in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS NON-MSA

LENDING TEST

CBI Bank & Trust's performance in the Illinois Non-MSA assessment area reflects a reasonable geographic dispersion of the bank's lending throughout the assessment area, and excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

Geographic Distribution of Loans

CBI Bank & Trust demonstrates reasonable geographic distribution of loans given its assessment area. The bank's assessment area consists of three moderate-income, 15 middle-income, two upper-income, and one unknown-income census tract. There are no low-income census tracts in the Illinois Non-MSA assessment area; therefore, analysis of the bank's geographic distribution will focus on lending in moderate-income census tracts. The bank originated loans in 100 percent of the 21 census tracts in the assessment area during the review period. Additionally, the bank originated 157 loans across all eleven distressed middle-income census tracts. Based upon this analysis, there are no conspicuous geographic lending gaps.

HMDA-Reportable Loans

Geographic distribution of HMDA-reportable loans reflects reasonable penetration throughout the assessment area. In 2024, CBI Bank & Trust originated 8.1 percent of HMDA-reportable loans by number in moderate-income census tracts. This was below the aggregate lenders (11.4 percent), but consistent with the percentage of owner-occupied units in moderate-income census tracts (7.5 percent).

The majority of HMDA-reportable loans by number (82.7 percent) were originated in middle-income census tracts which is comparable to aggregate lenders (82.1 percent) and the percentage of owner-occupied units in these tracts (83.7 percent). The bank originated 9.2 percent of its HMDA-reportable loans by number in upper-income census tracts which is consistent with aggregate lenders (6.5 percent) and the percentage of owner-occupied units in these tracts (8.4 percent).

The bank's total HMDA-reportable lending by geographic distribution in 2023 is slightly above 2024 performance. The bank's primary HMDA-reportable products during the review period were home purchase, refinance, and home improvement loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations.

Home Purchase

CBI Bank & Trust originated 7.6 percent of its HMDA-reportable home purchase loans by number in moderate-income census tracts in 2024. The bank's performance was below HMDA-reportable home purchase loans made by aggregate lenders (11.1 percent), but consistent with the percentage of owner-occupied units in moderate-income census tracts (7.5 percent).

The bank made 84.8 percent of its home purchase loans by number in middle-income census tracts, which was consistent with the percentage of home purchase loans originated by aggregate lenders (82.7 percent) and the percentage of owner-occupied units comprising such tracts (83.7 percent). The bank made 7.6 percent home purchase loans in upper-income census tracts, which was consistent with both the percentage of aggregate lenders (6.0 percent) and the percentage of owner-occupied units comprising these tracts (8.4 percent).

In 2023, home purchase loans represented 50.0 percent of the total HMDA-reportable loans in the assessment area. CBI Bank & Trust's lending in 2023 was comparable to 2024 performance.

Refinance

CBI Bank & Trust made 7.3 percent of its HMDA-reportable refinance loans by number in moderate-income census tracts in 2024. The bank's performance was below HMDA-reportable refinance loans made by aggregate lenders (12.0 percent), but consistent with the percentage of owner-occupied units in moderate-income census tracts (7.5 percent).

The bank made 81.8 percent of its refinance loans by number in middle-income census tracts, which was consistent with both the performance of the aggregate lenders (79.5 percent) and the percentage of owner-occupied units (83.7 percent) in middle-income census tracts. The bank's lending in upper-income census tracts by number (10.9 percent) was comparable to both aggregate lenders (8.5 percent) and the percentage of owner-occupied units (8.4 percent) within upper-income census tracts.

In 2023, CBI Bank & Trust's refinance lending was comparable to 2024 performance.

Home Improvement

CBI Bank & Trust originated 10.9 percent of its HMDA-reportable home improvement loans in moderate-income census tracts, which was below the aggregate percentage of 15.9 percent but above the 7.5 percent of owner-occupied units in the same tracts. The bank originated 78.3 percent of its home improvement loans in middle-income tracts, which was consistent with the aggregate lenders (77.3 percent) but below the percentage of owner-occupied units (83.7 percent). The bank originated 10.9 percent of its home improvement loans in the upper-income census tract which exceeded aggregate peer lending and was consistent with the percentage of owner-occupied units, at 6.8 percent and 8.4 percent, respectively.

Performance in 2023 overall was consistent with 2024 lending. Lending to the moderate-income tract was slightly above performance in 2024, aligning more consistently with aggregate peer performance.

The following table presents the 2023 and 2024 geographic distribution of HMDA-reportable loans in the assessment area.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: IL Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	9.2	8.4	474	4.5	4.2	6	7.6	11.1	330	3.4	6.2	7.5
Middle	80	81.6	86.5	9,326	88.1	89.9	67	84.8	82.7	8,491	87.8	84.7	83.7
Upper	7	7.1	4.7	573	5.4	5.6	6	7.6	6.0	852	8.8	9.1	8.4
Unknown	2	2.0	0.4	208	2.0	0.3	0	0.0	0.1	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	98	100.0	100.0	10,581	100.0	100.0	79	100.0	100.0	9,673	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	8.2	8.9	170	5.2	5.0	4	7.3	12.0	144	4.1	7.2	7.5
Middle	38	77.6	80.2	2,615	79.9	82.5	45	81.8	79.5	2,683	77.0	80.0	83.7
Upper	7	14.3	10.9	488	14.9	12.5	6	10.9	8.5	658	18.9	12.9	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	49	100.0	100.0	3,273	100.0	100.0	55	100.0	100.0	3,485	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	4.4	4.2	28	2.0	2.4	5	10.9	15.9	77	5.7	8.0	7.5
Middle	39	86.7	88.5	1,321	92.7	91.1	36	78.3	77.3	1,049	77.8	85.4	83.7
Upper	4	8.9	7.3	76	5.3	6.6	5	10.9	6.8	222	16.5	6.6	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	1,425	100.0	100.0	46	100.0	100.0	1,348	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	7.4
Middle	1	50.0	85.7	100	62.1	99.4	4	100.0	100.0	534	100.0	100.0	66.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.2
Unknown	1	50.0	14.3	61	37.9	0.6	0	0.0	0.0	0	0.0	0.0	25.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	161	100.0	100.0	4	100.0	100.0	534	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	7.7	8.2	672	4.3	4.1	15	8.1	11.4	551	3.7	5.6	7.5
Middle	159	81.1	85.3	13,438	86.0	89.3	153	82.7	82.1	12,807	84.9	85.8	83.7
Upper	19	9.7	6.1	1,239	7.9	6.3	17	9.2	6.5	1,732	11.5	8.5	8.4
Unknown	3	1.5	0.4	269	1.7	0.3	0	0.0	0.1	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	196	100.0	100.0	15,618	100.0	100.0	185	100.0	100.0	15,090	100.0	100.0	100.0

Source: 2024 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 Loans

Geographic distribution of small business loans reflects excellent penetration throughout the assessment area. While CBI Bank & Trust only originated 14 small business loans in 2024, three (21.4 percent) were originated in moderate-income census tracts, which was significantly above the percentage of total assessment area small businesses located in moderate-income census tracts (9.2 percent). A total of 71.4 percent of small business loans by number were originated in middle-income census tracts which was comparable to the percentage of total assessment area small businesses located in middle-income census tracts (73.3 percent). Lastly, 7.1 percent of small business loans by number were originated in upper-income census tracts which was comparable to the percentage of small businesses located in those same-tracts (5.8 percent).

The following table presents the geographic distribution of small business loans in the assessment area in 2024.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: IL Non MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	3	21.4	111	11.6	9.2
Middle	10	71.4	829	86.8	73.3
Upper	1	7.1	15	1.6	5.8
Unknown	0	0.0	0	0.0	11.7
Tract-Unk	0	0.0	0	0.0	
Total	14	100.0	955	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

Geographic distribution of small farm loans reflects reasonable penetration throughout the assessment area. CBI Bank & Trust did not originate any small farm loans in moderate-income census tracts in 2024. However, less than 1.0 percent (0.8) percent of assessment area small farms (two farms) are located in moderate-income census tracts leaving little lending opportunity in those census tracts. A total of 50.0 percent of small farm loans by number were originated in middle-income census tracts, which was substantially below the percentage of small farms located in those same tracts (76.6 percent). Lastly, 50.0 percent of small farm loans by number were originated in upper-income census tracts, which was significantly above the percentage of assessment area small farms located in upper-income census tracts (22.6 percent).

The following table presents the geographic distribution of small farm loans in the assessment area in 2024.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: IL Non MSA					
Geographic Income Level	**Bank Loans**				**Total Farms %**
	#	**#%**	**$(000)**	**$%**	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.8
Middle	5	50.0	576	42.9	76.6
Upper	5	50.0	767	57.1	22.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	10	100.0	1,343	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

CBI Bank & Trust demonstrates a distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes that is excellent given the demographics of the bank's assessment area.

<u>HMDA-Reportable Loans</u>

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among borrowers of different income levels. In 2024, CBI Bank & Trust originated 8.8 percent by number of total HMDA-reportable loans to low-income borrowers which was below aggregate lender performance (16.1 percent) and the percentage of low-income families in the assessment area (19.9 percent). A total of 19.9 percent of HMDA-reportable loans by number were made to moderate-income borrowers which was below aggregate lender performance (23.3 percent), but consistent with the percentage of moderate-income families in the assessment area (18.9 percent). The bank originated 21.5 percent of total HMDA-reportable loans by number to middle-income borrowers which was just above aggregate lender performance (18.4 percent) and comparable to the percentage of middle-income families in the assessment area (22.7 percent). A total of 44.2 percent of HMDA-reportable loans by number were made to upper-income borrowers which was significantly above aggregate lender performance (26.2 percent) and comparable to the percentage of upper-income families in the assessment area (38.4 percent). Lastly, the bank originated 5.5 percent of HMDA-reportable loans to borrowers of unknown income, compared to

the aggregate lender performance of 15.9 percent. The substantial majority of these HMDA-reportable loans were made to businesses; therefore, income information was not collected.

The bank's 2023 borrower distribution of HMDA-reportable lending was comparable to that of 2024.

Home Purchase

CBI Bank & Trust originated 12.7 percent of HMDA-reportable home purchase loans by number to low-income borrowers which was below both aggregate lenders (16.5 percent) and the percentage of low-income families in the assessment area (19.9 percent). A total of 25.3 percent of HMDA-reportable home purchase loans by number were made to moderate-income borrowers which was comparable to aggregate lender performance (25.2 percent) and above the percentage of moderate-income families in the assessment area (18.9 percent). The bank originated 15.2 percent of home purchase loans by number to middle-income borrowers which was just below aggregate lender performance (18.3 percent) and below the percentage of middle-income families in the assessment area (22.7 percent). A total of 44.3 percent of home purchase loans by number were originated to upper-income borrowers, which was significantly above aggregate lender performance (21.6) and above the percentage of upper-income families in the assessment area (38.4 percent). Lastly, 2.5 percent of home purchase loans by number were made to borrowers of unknown income compared to 18.5 percent for aggregate lender performance.

The bank's 2023 borrower distribution of HMDA-reportable home purchase loans was comparable to that of 2024.

Refinance

CBI Bank & Trust originated 5.5 percent of HMDA-reportable by number of its refinance loans to low-income borrowers in the assessment area which was below aggregate lender performance (14.5 percent) and the percentage of low-income families in the assessment area (19.9 percent). A total of 10.9 percent of HMDA-reportable refinance loans by number were made to moderate-income borrowers which was below aggregate lender performance (20.5 percent) and below the percentage of moderate-income families in the assessment area (18.9 percent). The bank originated 23.6 percent of refinance loans by number to middle-income borrowers which was above aggregate lender performance (14.5 percent) but comparable to the percentage of middle-income families in the assessment area (22.7 percent). A total of 52.7 percent of refinance loans by number were originated to upper-income borrowers which was significantly above both aggregate lender performance (36.5) and the percentage of upper-income families in the assessment area (38.4

percent). Lastly, 7.3 percent of HMDA-reportable refinance loans by number were made to borrowers of unknown income compared to aggregate lender performance of 14.0 percent.

The bank's 2023 borrower distribution of HMDA-reportable refinance loans was comparable to that of 2024.

Home Improvement

CBI Bank & Trust originated 6.5 percent by number of HMDA-reportable home improvement loans to low-income borrowers which was consistent with the aggregate lender performance (9.1 percent), but significantly below the percentage of low-income families in the assessment area (19.9 percent). However, 21.7 percent of the bank's home improvement loans were originated to moderate-income borrowers, which was consistent with both the aggregate lender performance (20.5 percent) and the 18.9 percent of moderate-income families in the assessment area. The bank originated 30.4 percent of home improvement loans by number to middle-income borrowers, which was consistent with aggregate lender performance (30.7 percent) and above the percentage of middle-income families in the assessment area (22.7 percent). The bank originated 34.8 percent of the home improvement loans by number to upper-income borrowers, which was consistent with aggregate lender performance (36.4 percent) but just below the percentage of upper-income borrowers in the assessment area, at 38.4 percent. Lastly, 6.5 percent of refinance loans were made to borrowers of unknown income, compared to the 3.4 percent aggregate lender performance.

Borrower distribution of HMDA-reportable home improvement loans in 2023 was consistent to performance in 2024. The following table presents the 2023 and 2024 borrower distribution of HMDA-reportable loans in the assessment area.

The following table presents CBI Bank & Trust's borrower distribution of HMDA-reportable loans in the assessment area in 2023 and 2024.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: IL Non MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	10	10.2	17.4	600	5.7	9.8	10	12.7	16.5	686	7.1	9.4	19.9
Moderate	31	31.6	26.8	2,412	22.8	21.1	20	25.3	25.2	1,566	16.2	20.4	18.9
Middle	18	18.4	20.4	1,753	16.6	21.3	12	15.2	18.3	1,272	13.2	21.0	22.7
Upper	30	30.6	22.5	5,081	48.0	34.3	35	44.3	21.6	6,032	62.4	33.9	38.4
Unknown	9	9.2	12.9	735	6.9	13.5	2	2.5	18.5	117	1.2	15.4	0.0
Total	98	100.0	100.0	10,581	100.0	100.0	79	100.0	100.0	9,673	100.0	100.0	100.0
Refinance Loans													
Low	5	10.2	17.7	182	5.6	10.1	3	5.5	14.5	99	2.8	8.3	19.9
Moderate	7	14.3	20.8	379	11.6	19.4	6	10.9	20.5	210	6.0	15.0	18.9
Middle	10	20.4	24.0	350	10.7	19.4	13	23.6	14.5	497	14.3	11.5	22.7
Upper	18	36.7	25.0	855	26.1	33.6	29	52.7	36.5	2,498	71.7	46.8	38.4
Unknown	9	18.4	12.5	1,507	46.0	17.5	4	7.3	14.0	181	5.2	18.3	0.0
Total	49	100.0	100.0	3,273	100.0	100.0	55	100.0	100.0	3,485	100.0	100.0	100.0
Home Improvement Loans													
Low	7	15.6	14.6	99	6.9	11.2	3	6.5	9.1	36	2.7	3.7	19.9
Moderate	4	8.9	14.6	86	6.0	10.2	10	21.7	20.5	226	16.8	13.3	18.9
Middle	11	24.4	28.1	297	20.8	19.5	14	30.4	30.7	331	24.6	20.8	22.7
Upper	19	42.2	37.5	885	62.1	57.0	16	34.8	36.4	724	53.7	61.5	38.4
Unknown	4	8.9	5.2	58	4.1	2.1	3	6.5	3.4	31	2.3	0.7	0.0
Total	45	100.0	100.0	1,425	100.0	100.0	46	100.0	100.0	1,348	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	22	11.3	17.4	881	5.7	10.2	16	8.8	16.1	821	5.6	9.1	19.9
Moderate	42	21.6	23.9	2,877	18.6	20.2	36	19.9	23.3	2,002	13.8	19.1	18.9
Middle	39	20.1	21.7	2,400	15.5	20.8	39	21.5	18.4	2,100	14.4	19.1	22.7
Upper	67	34.5	24.6	6,821	44.1	34.8	80	44.2	26.2	9,254	63.6	37.6	38.4
Unknown	24	12.4	12.4	2,478	16.0	14.0	10	5.5	15.9	379	2.6	15.1	0.0
Total	194	100.0	100.0	15,457	100.0	100.0	181	100.0	100.0	14,556	100.0	100.0	100.0

Source: 2024 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 Loans

The borrower distribution of small business loans reflects excellent penetration among businesses of different revenue sizes. In 2024, all of the sampled small business loans made in the assessment area were originated to businesses with revenues of $1 million or less compared to the 89.0 percent of total assessment area businesses with revenues of $1 million or less. Additionally, 78.6 percent of those loans were made in amounts of $100,000 or less, which is generally considered most beneficial to the financing needs of small businesses.

The following table summarizes the bank's 2024 small business lending in the assessment area.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: IL Non MSA					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	14	100.0	955	100.0	89.0
Over $1 Million	0	0.0	0	0.0	8.7
Revenue Unknown	0	0.0	0	0.0	2.3
Total	14	100.0	955	100.0	100.0
By Loan Size					
$100,000 or Less	11	78.6	408	42.7	
$100,001 - $250,000	2	14.3	244	25.5	
$250,001 - $1 Million	1	7.1	303	31.7	
Total	14	100.0	955	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	11	78.6	408	42.7	
$100,001 - $250,000	2	14.3	244	25.5	
$250,001 - $1 Million	1	7.1	303	31.7	
Total	14	100.0	955	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes. In 2024, all of the sampled small farm loans made in the assessment area were to small farms with revenues of $1 million or less compared to the 98.9 percent of total assessment area farms with revenues of $1 million or less. Additionally, 50.0 percent of those loans were made in amounts of $100,000 or less, which is generally considered most beneficial to the needs of small farms.

The following table summarizes the bank's 2024 small farm lending in the assessment area.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: IL Non MSA					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	10	100.0	1,343	100.0	98.9
Over $1 Million	0	0.0	0	0.0	1.1
Revenue Unknown	0	0.0	0	0.0	0.0
Total	10	100.0	1,343	100.0	100.0
By Loan Size					
$100,000 or Less	5	50.0	134	10.0	
$100,001 - $250,000	2	20.0	358	26.7	
$250,001 - $500,000	3	30.0	851	63.4	
Total	10	100.0	1,343	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	5	50.0	134	10.0	
$100,001 - $250,000	2	20.0	358	26.7	
$250,001 - $500,000	3	30.0	851	63.4	
Total	10	100.0	1,343	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Lending, Investment, and Services Activities

The bank demonstrates excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services.

Lending

CBI Bank & Trust originated 20 qualified community development loans in the assessment area for an approximate total of $8.4 million. Community development loans focused on revitalization/stabilization, community services, and economic development in the assessment area. A majority of loans were dedicated to organizations with a revitalization/stabilization purpose ($8.1 million), helping to retain/attract businesses and residents in the assessment area. Community development lending is considered responsive to assessment credit needs as the community representative noted a declining population and a workforce shortage. Overall, the bank's performance is a decrease from the previous evaluation where the bank made 24 community development loans for a total of $16.6 million.

Investments

During this evaluation period, CBI Bank & Trust made one new qualifying community development investment in the assessment area worth $620,000. Additionally, nine prior period qualified investments with outstanding balances totaling $3.3 million were counted as part of this evaluation and benefited the bank's assessment area. All of the bank's investments in this assessment area were for the purpose of revitalization/stabilization. As mentioned, this is considered responsive to assessment credit needs as the community representative noted a declining population and a workforce shortage. This is an increase from the prior evaluation of $740,000 despite the total number of investments remaining the same (10). Additionally, CBI Bank & Trust made 105 qualified community development donations in the assessment area for an approximate total of 205,000. This presented a substantial increase in community development donations from the prior evaluation where the bank made 95 donations for $129,000.

Services

CBI Bank & Trust staff served a total of 2,324.5 qualified hours with 18 different organizations providing community development services in the assessment area. Of the total service hours, the bank dedicated 1295 hours to 13 organizations with a community service focus, 497.5 hours to five organizations with an economic development focus, 328 hours to five organizations in the assessment area with affordable housing purposes, and 204 hours to three organizations with revitalization/stabilization purposes. The is an increase in total hours served from the previous evaluation where bank staff provided 1,722 hours to 15 organizations.

The following table presents the bank's community development activities in the assessment area during the review period.

Summary of Community Development Activities from July 19, 2022 – October 20, 2025 Assessment Area: IL Non MSA										
Type of Activity	Affordable Housing		Economic Development		Revitalize and Stabilize		Community Service		Totals	
	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours
Lending	0	0	1	330,224	18	8,106,785	1	10,299	20	8,447,308
Investments	0	0	0	0	10	3,955,000	0	0	10	3,955,000
Donations	1	100	13	8,947	35	162,128	56	33,744	105	204,919
Services	5	328	5	497.5	3	204	13	1295	26	2324.5

PEORIA, IL MSA #37900 – LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PEORIA, IL MSA

The Peoria, IL MSA #37900 assessment area is comprised Peoria and Tazewell counties in their entireties. The bank operates two branches and one cash-only ATM within the Peoria, IL MSA assessment area. Since the previous evaluation, the bank has not opened or closed any branches in the assessment area and the assessment area remains unchanged. However, CBI Bank & Trust did close a cash-only ATM located in an upper-income census tract, in Edwards, Illinois in November of 2023.

The FDIC Deposit Market Share Report dated June 30, 2024, ranked CBI Bank & Trust 17th among 29 FDIC-insured institutions operating in the assessment area. During this time, the bank held approximately $66.8 million in deposits representing a 0.8 percent market share, compared to the market leader Morton Community Bank (Morton, IL), which holds 36.0 percent (approximately $3.0 billion) of the assessment area's deposits.

CBI Bank & Trust ranked 22nd out of 243 aggregate lenders in 2024 HMDA-reportable transactions. A total of 58 originations were reported by the bank compared to 1,425 originations reported by market leader Citizens Equity First. The data is indicative of a saturated market with respect to HMDA reporters. CBI Bank & Trust's presence is limited in the assessment area with only two branch locations. Competition for HMDA-reportable loans is strong in the market as the bank competes with large national lenders, credit unions, and mortgage companies. Additional assessment area demographic information is provided in the following table.

2024 Peoria, IL MSA 37900 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	11.4	4,022	5.1	1,698	42.2	15,899	20.1
Moderate	17	21.5	14,744	18.7	2,018	13.7	14,785	18.7
Middle	38	48.1	41,453	52.5	2,358	5.7	16,789	21.3
Upper	15	19.0	18,724	23.7	464	2.5	31,470	39.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**79**	**100.0**	**78,943**	**100.0**	**6,538**	**8.3**	**78,943**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	10,532	2,509	2.8	23.8	5,554	52.7	2,469	23.4
Moderate	29,855	16,922	19.0	56.7	8,985	30.1	3,948	13.2
Middle	73,421	49,404	55.5	67.3	17,339	23.6	6,678	9.1
Upper	28,813	20,255	22.7	70.3	6,548	22.7	2,010	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**142,621**	**89,090**	**100.0**	**62.5**	**38,426**	**26.9**	**15,105**	**10.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,039	10.5	842	9.7	188	18.2	9	7.6
Moderate	1,641	16.7	1,492	17.1	130	12.6	19	16.1
Middle	4,873	49.5	4,356	50.1	448	43.3	69	58.5
Upper	2,299	23.3	2,010	23.1	268	25.9	21	17.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9,852**	**100.0**	**8,700**	**100.0**	**1,034**	**100.0**	**118**	**100.0**
Percentage of Total Businesses:				**88.3**		**10.5**		**1.2**
	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	42	11.9	41	11.8	1	14.3	0	0.0
Middle	224	63.3	219	63.3	4	57.1	1	100.0
Upper	88	24.9	86	24.9	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**354**	**100.0**	**346**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.7**		**2.0**		**0.3**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS PEORIA, IL MSA

Assessment Area	Lending Test	Community Development Test
Peoria, IL MSA #37900	Consistent	Consistent

The institution's lending performance in the area is consistent with the institution's satisfactory lending performance overall in the state of Illinois. The institution's community development performance in the area is consistent with the institution's outstanding community development performance overall in the state of Illinois; however, it does not impact the overall rating for the state of Illinois. Please see the following lending and community development tables for more details.

LENDING TEST

Geographic Distribution of Loans

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Peoria, IL MSA 37900													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	4.0	1.7	232	6.3	1.0	0	0.0	1.6	0	0.0	0.7	2.8
Moderate	5	20.0	19.7	431	11.8	12.9	8	25.0	21.3	1,168	15.9	13.7	19.0
Middle	6	24.0	57.6	1,026	28.0	53.3	8	25.0	54.4	1,335	18.1	49.8	55.5
Upper	13	52.0	21.0	1,974	53.9	32.8	16	50.0	22.7	4,864	66.0	35.8	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	3,663	100.0	100.0	32	100.0	100.0	7,367	100.0	100.0	100.0
Refinance Loans													
Low	1	5.3	1.7	11	0.5	0.9	0	0.0	1.2	0	0.0	0.8	2.8
Moderate	4	21.1	20.9	176	8.0	13.0	2	18.2	16.2	336	20.4	11.3	19.0
Middle	4	21.1	56.3	579	26.4	57.8	4	36.4	57.5	780	47.3	56.1	55.5
Upper	10	52.6	21.1	1,425	65.0	28.2	5	45.5	25.1	533	32.3	31.8	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	2,191	100.0	100.0	11	100.0	100.0	1,649	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.1	0	0.0	0.3	0	0.0	1.7	0	0.0	1.3	2.8
Moderate	0	0.0	14.8	0	0.0	12.0	1	33.3	16.1	20	21.3	10.5	19.0
Middle	4	50.0	60.2	187	44.8	53.5	2	66.7	56.7	74	78.7	54.2	55.5
Upper	4	50.0	23.9	230	55.2	34.1	0	0.0	25.4	0	0.0	34.0	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	417	100.0	100.0	3	100.0	100.0	94	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	2	22.2	7.8	2,773	19.0	4.2	0	0.0	5.2	0	0.0	29.2	14.7
Moderate	3	33.3	23.4	2,408	16.5	7.2	3	30.0	34.5	1,583	47.1	44.5	16.4
Middle	2	22.2	43.8	1,410	9.7	14.8	5	50.0	39.7	1,499	44.6	16.6	45.8
Upper	2	22.2	25.0	7,974	54.7	73.8	2	20.0	20.7	282	8.4	9.7	23.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	14,565	100.0	100.0	10	100.0	100.0	3,364	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	6.6	1.7	3,016	14.5	1.3	0	0.0	1.5	0	0.0	2.1	2.8
Moderate	12	19.7	19.0	3,015	14.5	12.3	14	25.0	19.5	3,107	24.9	14.5	19.0
Middle	16	26.2	57.2	3,202	15.4	49.5	19	33.9	55.2	3,688	29.6	49.4	55.5
Upper	29	47.5	22.0	11,603	55.7	37.0	23	41.1	23.8	5,679	45.5	34.0	22.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	61	100.0	100.0	20,836	100.0	100.0	56	100.0	100.0	12,474	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Peoria, IL MSA 37900					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
Low	1	8.3	361	14.4	10.5
Moderate	2	16.7	681	27.1	16.7
Middle	2	16.7	75	3.0	49.5
Upper	7	58.3	1,392	55.5	23.3
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	12	100.0	2,510	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Peoria, IL MSA 37900					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	11.9
Middle	1	20.0	25	28.1	63.3
Upper	4	80.0	64	71.9	24.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	5	100.0	89	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Peoria, IL MSA 37900													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	4.0	19.0	54	1.5	10.4	0	0.0	15.1	0	0.0	8.0	20.1
Moderate	2	8.0	26.7	242	6.6	20.9	5	15.6	25.7	553	7.5	19.0	18.7
Middle	5	20.0	20.2	571	15.6	21.1	6	18.8	20.0	840	11.4	20.3	21.3
Upper	14	56.0	23.9	2,485	67.8	37.5	17	53.1	25.4	5,368	72.9	39.1	39.9
Unknown	3	12.0	10.2	311	8.5	10.1	4	12.5	13.7	606	8.2	13.6	0.0
Total	25	100.0	100.0	3,663	100.0	100.0	32	100.0	100.0	7,367	100.0	100.0	100.0
Refinance Loans													
Low	3	15.8	18.1	86	3.9	11.2	0	0.0	12.7	0	0.0	6.7	20.1
Moderate	3	15.8	22.6	210	9.6	18.3	1	9.1	18.8	17	1.0	13.8	18.7
Middle	3	15.8	22.7	375	17.1	23.2	1	9.1	19.8	61	3.7	18.2	21.3
Upper	5	26.3	26.1	769	35.1	33.6	8	72.7	29.5	1,468	89.0	33.3	39.9
Unknown	5	26.3	10.6	751	34.3	13.7	1	9.1	19.2	103	6.2	28.0	0.0
Total	19	100.0	100.0	2,191	100.0	100.0	11	100.0	100.0	1,649	100.0	100.0	100.0
Home Improvement Loans													
Low	1	12.5	7.9	80	19.2	3.7	1	33.3	12.3	24	25.5	6.8	20.1
Moderate	0	0.0	19.8	0	0.0	13.6	0	0.0	19.1	0	0.0	12.4	18.7
Middle	1	12.5	28.2	10	2.4	21.7	2	66.7	26.1	70	74.5	20.8	21.3
Upper	4	50.0	39.7	240	57.6	54.3	0	0.0	40.1	0	0.0	58.4	39.9
Unknown	2	25.0	4.4	87	20.9	6.7	0	0.0	2.4	0	0.0	1.7	0.0
Total	8	100.0	100.0	417	100.0	100.0	3	100.0	100.0	94	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	9.6	17.3	220	3.5	10.1	1	2.2	14.2	24	0.3	7.7	20.1
Moderate	5	9.6	24.7	452	7.2	20.0	6	13.0	23.3	570	6.3	17.7	18.7
Middle	9	17.3	21.4	956	15.2	21.4	9	19.6	20.9	971	10.7	20.0	21.3
Upper	23	44.2	26.4	3,494	55.7	38.0	25	54.3	28.4	6,836	75.0	39.4	39.9
Unknown	10	19.2	10.1	1,149	18.3	10.5	5	10.9	13.2	709	7.8	15.1	0.0
Total	52	100.0	100.0	6,271	100.0	100.0	46	100.0	100.0	9,110	100.0	100.0	100.0

Source: 2024 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.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Peoria, IL MSA 37900					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	12	100.0	2,509	100.0	88.3
Over $1 Million	0	0.0	0	0.0	10.5
Revenue Unknown	0	0.0	0	0.0	1.2
Total	12	100.0	2,510	100.0	100.0
By Loan Size					
$100,000 or Less	5	41.7	303	12.1	
$100,001 - $250,000	1	8.3	200	8.0	
$250,001 - $1 Million	6	50.0	2,006	79.9	
Total	12	100.0	2,510	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	5	41.7	303	12.1	
$100,001 - $250,000	1	8.3	200	8.0	
$250,001 - $1 Million	6	50.0	2,006	80.0	
Total	12	100.0	2,509	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Peoria, IL MSA 37900					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	5	100.0	89	100.0	97.7
Over $1 Million	0	0.0	0	0.0	2.0
Revenue Unknown	0	0.0	0	0.0	0.3
Total	5	100.0	89	100.0	100.0
By Loan Size					
$100,000 or Less	5	100.0	89	100.0	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $500,000	0	0.0	0	0.0	
Total	5	100.0	89	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	5	100.0	89	100.0	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $500,000	0	0.0	0	0.0	
Total	5	100.0	89	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Summary of Community Development Activities from July 19, 2022 – October 20, 2025 Assessment Area: Peoria, IL MSA 37900										
Type of Activity	Affordable Housing		Economic Development		Revitalize and Stabilize		Community Service		Totals	
	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours
Lending	0	0	0	0	4	5,290,036	2	400,000	6	5,690,036
Investments	0	0	0	0	3	1,360,000	0	0	3	1,360,000
Donations	0	0	0	0	0	0	12	21,875	12	21,875
Services	1	3	2	127	0	0	8	706.5	11	836.5

ROCKFORD, IL MSA #40420 – LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ROCKFORD, IL MSA

The Rockford, IL MSA assessment area is comprised of Winnebago county in its entirety. The bank operates one branch and one cash-only ATM within the Rockford, IL MSA assessment area. The Rockford, IL MSA assessment area was added to the bank's combined assessment area as a result of the October 21, 2023, acquisition of six SENB Bank branches, which included a branch and ATM in Roscoe, Illinois in the Rockford IL, MSA. Due to the late 2023 acquisition, only 2024 HMDA-reportable data was considered for comparison with lending performance in the state of Illinois. Additionally, the review period for community development activities was limited to the acquisition date (October 21, 2023) through October 20, 2025, a period of 24 months.

The FDIC Deposit Market Share Report dated June 30, 2024, ranked CBI Bank & Trust 17th among 19 FDIC-insured institutions operating in the assessment area. During this time, the bank held approximately $30 million in deposits representing a 0.4 percent market share, compared to the market leader HTLF Bank (Denver, CO), which holds 21.2 percent (approximately $1.6 billion) of the assessment area's deposits.

CBI Bank & Trust ranked 53rd out of 299 aggregate lenders in 2024 HMDA-reportable transactions. A total of nine originations were reported by the bank compared to 582 originations reported by market leader GreenState Credit Union. The bank's presence within the Rockford, IL market is limited and the data is indicative of a saturated market with respect to HMDA reporters.

Additional assessment area demographic information is provided in the following table.

2024 Rockford, IL MSA 40420 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	10.0	5,038	6.8	2,278	45.2	16,937	22.8
Moderate	25	31.3	19,398	26.1	3,676	19.0	13,203	17.8
Middle	23	28.8	24,474	33.0	1,777	7.3	14,553	19.6
Upper	21	26.3	24,690	33.3	734	3.0	29,552	39.8
Unknown	3	3.8	645	0.9	361	56.0	0	0.0
Total AA	**80**	**100.0**	**74,245**	**100.0**	**8,826**	**11.9**	**74,245**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,874	2,808	3.7	28.4	5,464	55.3	1,602	16.2
Moderate	36,020	16,842	22.2	46.8	15,368	42.7	3,810	10.6
Middle	41,487	27,448	36.2	66.2	11,724	28.3	2,315	5.6
Upper	36,230	28,547	37.6	78.8	5,880	16.2	1,803	5.0
Unknown	2,092	232	0.3	11.1	1,455	69.6	405	19.4
Total AA	**125,703**	**75,877**	**100.0**	**60.4**	**39,891**	**31.7**	**9,935**	**7.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	535	5.5	467	5.4	65	6.8	3	4.9
Moderate	2,597	26.8	2,262	26.0	316	33.0	19	31.1
Middle	3,133	32.3	2,852	32.8	264	27.6	17	27.9
Upper	3,107	32.0	2,830	32.6	258	26.9	19	31.1
Unknown	333	3.4	275	3.2	55	5.7	3	4.9
Total AA	**9,705**	**100.0**	**8,686**	**100.0**	**958**	**100.0**	**61**	**100.0**
Percentage of Total Businesses:				**89.5**		**9.9**		**0.6**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.3	2	1.3	0	0.0	0	0.0
Moderate	10	6.3	10	6.4	0	0.0	0	0.0
Middle	15	9.4	15	9.6	0	0.0	0	0.0
Upper	133	83.1	130	82.8	3	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**160**	**100.0**	**157**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.1**		**1.9**		**0.0**

Source: *2024 FFIEC Census Data*
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS ROCKFORD, IL MSA

Assessment Area	Lending Test	Community Development Test
Rockford, IL MSA #40420	Consistent	Consistent

The institution's lending performance in the area is consistent with the institution's satisfactory lending performance overall in the state of Illinois.

The institution's community development performance in the area is below the institution's outstanding community development performance for the state of Illinois; however, it does not impact the overall rating for the state of Illinois. Please see the following lending and community development tables for more details.

LENDING TEST

Geographic Distribution of Loans

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Rockford, IL MSA 40420													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.5	0	0.0	2.3	1	14.3	4.1	124	14.6	2.9	3.7
Moderate	0	0.0	24.5	0	0.0	19.0	2	28.6	25.2	236	27.7	20.2	22.2
Middle	0	0.0	38.0	0	0.0	36.9	2	28.6	36.1	322	37.8	35.2	36.2
Upper	1	100.0	33.7	200	100.0	40.3	2	28.6	34.4	170	20.0	40.3	37.6
Unknown	0	0.0	0.3	0	0.0	1.4	0	0.0	0.2	0	0.0	1.4	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	200	100.0	100.0	7	100.0	100.0	852	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Rockford, IL MSA 40420					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	5.5
Moderate	1	25.0	1,000	65.1	26.8
Middle	2	50.0	435	28.3	32.3
Upper	1	25.0	100	6.5	32.0
Unknown	0	0.0	0	0.0	3.4
Tract-Unk	0	0.0	0	0.0	
Total	4	100.0	1,535	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Rockford, IL MSA 40420					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	1.3
Moderate	0	0.0	0	0.0	6.3
Middle	0	0.0	0	0.0	9.4
Upper	0	0.0	0	0.0	83.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	0	0.0	0	0.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Rockford, IL MSA 40420													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	12.6	0	0.0	7.7	0	0.0	11.4	0	0.0	7.1	22.8
Moderate	0	0.0	24.9	0	0.0	20.6	2	28.6	24.0	110	12.9	20.0	17.8
Middle	0	0.0	23.7	0	0.0	24.2	1	14.3	23.4	140	16.4	23.3	19.6
Upper	0	0.0	26.1	0	0.0	32.4	0	0.0	25.6	0	0.0	31.4	39.8
Unknown	0	0.0	12.8	0	0.0	15.1	4	57.1	15.6	602	70.7	18.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	7	100.0	100.0	852	100.0	100.0	100.0

Source: 2024 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.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Rockford, IL MSA 40420					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	3	75.0	535	34.9	89.5
Over $1 Million	1	25.0	1,000	65.1	9.9
Revenue Unknown	0	0.0	0	0.0	0.6
Total	4	100.0	1,535	100.0	100.0
By Loan Size					
$100,000 or Less	1	25.0	100	6.5	
$100,001 - $250,000	2	50.0	435	28.3	
$250,001 - $1 Million	1	25.0	1,000	65.1	
Total	4	100.0	1,535	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	1	33.3	100	18.7	
$100,001 - $250,000	2	66.7	435	81.3	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	3	100.0	535	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Rockford, IL MSA 40420					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	0	0.0	0	0.0	98.1
Over $1 Million	0	0.0	0	0.0	1.9
Revenue Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
By Loan Size					
$100,000 or Less	0	0.0	0	0.0	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $500,000	0	0.0	0	0.0	
Total	0	0.0	0	0.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	0	0.0	0	0.0	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $500,000	0	0.0	0	0.0	
Total	0	0.0	0	0.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Summary of Community Development Activities from October 21, 2023 – October 20, 2025 Assessment Area: Rockford, IL MSA 40420										
Type of Activity	Affordable Housing		Economic Development		Revitalize and Stabilize		Community Service		Totals	
	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours
Lending	0	0	0	0	4	7,617,901	0	0	4	7,617,901
Investments	0	0	0	0	0	0	0	0	0	0
Donations	0	0	0	0	0	0	8	2,063	8	2,063
Services	0	0	1	2	0	0	4	211	5	213

STATE OF WISCONSIN

CRA RATING FOR WISCONSIN: Outstanding
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

CBI Bank & Trust is rated Outstanding in the state of Wisconsin based on reasonable geographic distribution of loans throughout the assessment area and a reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes. The bank demonstrates excellent responsiveness to the needs of its assessment area through community development loans, qualified investments, and community development services. This performance is appropriate, considering the bank's capacity, and the need and availability of such opportunities for community development in the bank's sole assessment area in Wisconsin.

SCOPE OF EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of this performance evaluation with the exception of the review periods for the bank's HMDA lending and community development activities. As a result of the bank's merger with SENB Bank on October 21, 2023, only 2024 HMDA lending was considered and the review period for community development activities was the acquisition date (October 21, 2023) through October 20, 2025. Please refer to the Scope of Examination section for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WISCONSIN

CBI Bank & Trust's operations in Wisconsin consists of the Janesville-Beloit, WI MSA assessment area, which includes the entirety of Rock County, Wisconsin. The bank operates one branch and one cash-only ATM located in Beloit, Wisconsin. Please refer to the individual assessment area summary for demographic and economic conditions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

CBI Bank & Trust's performance relative to the lending test in the state of Wisconsin is satisfactory based on reasonable geographic distribution of loans throughout the assessment area and a reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

Geographic and Borrower Distribution

CBI Bank & Trust's lending activities reflect reasonable distribution throughout the sole assessment area within the state of Wisconsin.

The geographic distribution of HMDA-reportable, small business, and small farm loans reflects reasonable penetration. In addition, the distribution of loans reflects reasonable penetration among borrowers of different income levels and businesses and farms of different sizes as supported by a review of HMDA-reportable, small business and small farm loans. Further discussion with respect to the geographic and borrower distributions of lending can be found in the individual assessment area analysis.

COMMUNITY DEVELOPMENT TEST

Lending, Investments, and Services Activities

CBI Bank & Trust's community development activities are outstanding. The bank demonstrates excellent responsiveness to the community development needs of the communities it serves in the state of Wisconsin through community development loans, qualified investments, and community development services.

The conclusions regarding the bank's lending, investment (including donations) and service activities within the state of Wisconsin are based on the analysis of the Janesville-Beloit, WI MSA assessment area. Please refer to the individual assessment area summary for support of the overall rating.

JANESVILLE-BELOIT, WI MSA #27500 – FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Janesville-Beloit, WI MSA assessment area. The scope is consistent with the scope presented in the overall section of the performance evaluation with exception of the review periods for the bank's HMDA lending and community development activities. As a result of the bank's acquisition of SENB on October 21, 2023, only 2024 HMDA- reportable lending was evaluated, and the review period for community development activities was the acquisition date (October 21, 2023) through October 20, 2025. Please refer to the Scope of Examination section in the institution summary for more detailed information.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN JANESVILLE-BELOIT, WI MSA

The Janesville-Beloit, WI MSA is comprised of the entirety of Rock County, Wisconsin, the sole county in the MSA. The Janesville-Beloit, WI MSA assessment area was added to the bank's combined assessment area as a result of the October 2023 acquisition of six SENB branch locations, which included a branch in Beloit, Wisconsin.

The assessment area is comprised of 41 total census tracts. Based on 2024 FFIEC Census and 2016-2020 ACS data, the assessment area consists of one low-, 11 moderate-, 20 middle-, and nine upper-income census tracts. CBI Bank & Trust operates one branch and one cash-only ATM within the assessment area. The single branch location in Beloit, Wisconsin is located in a middle-income census tract.

The FDIC Deposit Market Share Report, dated June 30, 2024, ranked CBI Bank & Trust 15th among 17 FDIC-insured institutions operating in the assessment area. The bank holds a 1.1 percent market share, compared to the market leader BMO Bank National Association (Chicago, IL), which holds 16.4 percent of the assessment area's deposits.

CBI Bank & Trust ranked 35th out of 245 aggregate lenders in 2024 HMDA-reportable transactions. A total of 27 originations were reported by the bank compared to market leaders Summit Credit Union with 515 originations and BlackHawk Community Credit Union with 476 originations, which rank first and second in the market, respectively. The market is highly competitive with credit unions, national lenders, and mortgage companies ranked as the top ten lenders for HMDA-reportable loans in the market.

Additional assessment area demographic information for 2024 is provided in the following table. 2023 assessment area demographic information is provided in Appendix C.

2024 Janesville-Beloit, WI MSA 27500 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.4	132	0.3	43	32.6	8,164	19.7
Moderate	11	26.8	9,430	22.7	1,464	15.5	7,792	18.8
Middle	20	48.8	21,596	52.0	1,663	7.7	9,353	22.5
Upper	9	22.0	10,386	25.0	487	4.7	16,235	39.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**41**	**100.0**	**41,544**	**100.0**	**3,657**	**8.8**	**41,544**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	617	91	0.2	14.7	413	66.9	113	18.3
Moderate	17,242	8,749	19.6	50.7	7,328	42.5	1,165	6.8
Middle	35,630	24,082	54.0	67.6	9,276	26.0	2,272	6.4
Upper	15,789	11,703	26.2	74.1	3,595	22.8	491	3.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**69,278**	**44,625**	**100.0**	**64.4**	**20,612**	**29.8**	**4,041**	**5.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	193	3.8	170	3.7	19	4.4	4	7.0
Moderate	853	16.8	798	17.4	52	12.1	3	5.3
Middle	2,580	50.8	2,329	50.7	213	49.7	38	66.7
Upper	1,454	28.6	1,297	28.2	145	33.8	12	21.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**5,080**	**100.0**	**4,594**	**100.0**	**429**	**100.0**	**57**	**100.0**
Percentage of Total Businesses:				**90.4**		**8.4**		**1.1**
	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	6	2.5	6	2.5	0	0.0	0	0.0
Middle	143	58.8	140	59.1	3	50.0	0	0.0
Upper	94	38.7	91	38.4	3	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**243**	**100.0**	**237**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.5**		**2.5**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Population Characteristics

The assessment area's population (163,687) remained steady from 2015 to 2020 with an increase of 1.8 percent. Population growth in the state of Wisconsin was slightly higher than that of the assessment area at 2.6 percent. The community representative agreed that the population in Rock County, WI, remains relatively stable. It was noted there is opportunity for population to grow in the county; however, the lack of housing to support any population growth is a concern. The community representative also spoke to the large commuter population in the county as many Rock County residents commute to surrounding metro areas, such as Madison, WI, for work while maintaining homes in Rock County. The following table presents population changes in the assessment area from 2015 to 2020.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Assessment Area	160,727	163,687	1.8%
Wisconsin	5,742,117	5,893,718	2.6%
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

Income Characteristics

According to 2024 FFIEC Census Data, the assessment area is comprised of 41,544 families, of which 19.7 percent are designated as low-income, 18.8 percent are moderate-income, 22.5 percent are middle-income, and 39.1 percent are upper-income families. Further, 8.8 percent of families residing within the assessment area live below the poverty line, which is above the poverty rate for the state of Wisconsin (6.8 percent). According to the 2016-2020 ACS, the MFI for the assessment area is $72,372 which is below the MFI for the state of Wisconsin ($80,844); however, since 2015 the assessment area has experienced a consistent MFI increase (8.9 percent) when compared to the state of Wisconsin (8.7 percent). The community representative noted that while income has increased in recent years, it has not outpaced cost-of-living increases in the area, most notably when it comes to housing and childcare.

Median Family Income Change			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change (%)**
Assessment Area	66,451	72,372	8.9
Wisconsin	74,365	80,844	8.7
Source: 2011 - 2015 and 2016 -2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

There is a total of 69,278 housing units within the assessment area. The majority of housing units are owner-occupied (64.4 percent), followed by rental units (29.8 percent) and vacant units (5.8 percent). The percentage of vacant units within the assessment area is below the percentage of vacant units within the state of Wisconsin (12.2 percent). According to 2024 FFIEC Census Data, the assessment area had a median housing value of $156,815 and median gross rent of $860. Housing value trends from 2016-2020 show that values in the assessment area are significantly below housing values for the state of Wisconsin.

Households are considered housing cost burdened when their gross monthly housing costs in relation to gross monthly income is 30.0 percent or above. As shown in the following table, large percentages of both low-income households, whether renters or homeowners, are housing cost burdened; however, residents across all low- and moderate-income levels and ownership categories in the assessment area are housing burdened at a rate consistent with residents in the state.

A community representative stated that housing stock of all types is limited in Rock County. The representative mentioned that housing costs have increased substantially in recent years, and there has been an increase in the usage of affordable housing services, including emergency rental assistance. While there has been a decline in home mortgage lending over the past few years, the representative primarily attributed this to the broader interest rate environment rather than lack of participation from area financial institutions. According to the representative, there has been interest in market rate housing developments; however, nothing has materialized.

The following table shows the percentage of renters and owners who are spending more than 30 percent of household income on housing costs.

Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	77.4%	31.7%	36.2%	66.0%	30.6%	17.0%
Wisconsin	75.0%	25.2%	38.4%	63.9%	29.3%	16.9%
Cost Burden is housing cost that equals 30 percent or more of household income *Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*						

Employment Conditions

The unemployment rates for the assessment area and the state steadily declined from 2020-2022

and then remained stable in 2023 and 2024. In 2024, the unemployment rate for the assessment area (5.1 percent) was consistent with that of the state of Wisconsin (5.2 percent). A community representative noted that unemployment had been decreasing towards pre-pandemic levels. Additionally, the representative mentioned that employment for low- and moderate-income individuals is attainable as manufacturing is a large source of employment for Rock County. The representative indicated that a number of businesses have expressed interest in operating in Rock County, but there is not enough housing to support employment growth.

The following table presents the unemployment trends for the assessment area and the state of Wisconsin from 2020 to 2024.

Unemployment Rates					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Assessment Area	7.4%	4.6%	3.4%	3.2%	3.2%
Wisconsin	6.4%	3.8%	2.8%	2.8%	3.0%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Industry Characteristics

The assessment area's major employers include manufacturing, healthcare, retail, food services, and wholesale trade. In addition to these major employers, Dun & Bradstreet data indicate that there were 5,080 businesses and 243 farms located within the assessment area in 2024, the majority (90.4 percent and 97.5 percent, respectively) had revenues of $1 million or less. A community representative stated there have not been any notable changes to the industry composition in the assessment area. While employment is relatively strong in the community, the representative indicated the childcare and manufacturing industries have experienced shortages of workers in Rock County.

Community Representative

One community representative was contacted to provide information regarding local economic and demographic conditions. The representative stated that population and employment remain relatively strong in the community with manufacturing and healthcare being major employers. Additionally, the representative highlighted the need for additional housing of all types to support population and employment growth. The representative also indicated that a lack of childcare options and increased costs associated with childcare was another pressing issue in the assessment area. While area financial institutions are active in the community, the representative noted housing and childcare needs present more opportunities for involvement.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN JANESVILLE-BELOIT, WI MSA

LENDING TEST

CBI Bank & Trust's performance in the Janesville-Beloit, WI MSA assessment area reflects a reasonable geographic dispersion of its lending throughout the assessment area and a reasonable penetration among borrowers of different incomes, including low- and moderate-income, and businesses and farms of different revenue sizes.

Geographic Distribution of Loans

CBI Bank & Trust demonstrates reasonable geographic distribution of loans given the bank's assessment area.

The bank's assessment area consists of one low-income, 11 moderate-income, 20 middle-income, and nine upper-income census tracts. In 2024, the bank made loans in 14 of the 41 census tracts in the assessment area, including in 41.7 percent of low- and moderate-income census tracts. No conspicuous geographic lending gaps were identified given the bank's limited branch footprint and time in the market.

HMDA-Reportable Loans

Geographic distribution of HMDA-reportable loans reflects excellent penetration throughout the assessment area. In 2024, CBI Bank & Trust did not originate a HMDA-reportable loan in the lone low-income tract; however, there is minimal opportunity in this tract and the bank's performance is comparable to both aggregate lending and the percentage of owner-occupied units in the low-income census tracts (0.2 percent). The bank originated 41.7 percent of HMDA-reportable loans in moderate-income tracts by number. This was significantly above both aggregate lender performance by number (20.1 percent) and the percentage of owner-occupied units in low- and moderate-income census tracts (19.8 percent).

HMDA-reportable loans originated in middle-income census tracts by number (41.7 percent) was below both aggregate lenders performance (54.6 percent) and the percentage of owner-occupied units located in middle-income tracts (54.0 percent). The bank originated 16.7 percent of its HMDA-reportable loans by number in upper-income census tracts, which was below HMDA-reportable loans by number (25.1 percent) for the aggregate of lenders as well as the percentage of owner-occupied units in upper-income census tracts (26.2 percent).

The following table presents the 2023 and 2024 geographic distribution of HMDA-reportable loans in the assessment area.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Janesville-Beloit, WI MSA 27500													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.2
Moderate	0	0.0	20.6	0	0.0	16.1	10	41.7	20.1	1,057	32.5	16.2	19.6
Middle	2	66.7	53.0	330	67.3	52.5	10	41.7	54.6	1,490	45.8	53.1	54.0
Upper	1	33.3	26.2	160	32.7	31.2	4	16.7	25.1	706	21.7	30.6	26.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	490	100.0	100.0	24	100.0	100.0	3,253	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

<u>Small Business Loans</u>

Geographic distribution of small business loans reflects poor penetration throughout the assessment area. While CBI Bank & Trust originated eight small business loans in the assessment area in 2024, no loans were originated in low- or moderate-income census tracts. In comparison, 3.8 percent of total businesses are located in the low-income census tract while 16.8 percent of total businesses are in moderate-income census tracts within the assessment area. The bank originated 87.5 percent of its small business loans in middle-income census tracts which was above the percentage of small businesses located in middle-income tracts in the assessment area (50.8 percent). Additionally, the bank made one small business loan (12.5 percent by number) in an upper-income census tract which was below the percentage of small businesses in such tracts (28.6 percent).

The following table presents the geographic distribution of small business loans in the assessment area in 2024.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Janesville-Beloit, WI MSA 27500					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	3.8
Moderate	0	0.0	0	0.0	16.8
Middle	7	87.5	953	95.9	50.8
Upper	1	12.5	41	4.1	28.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	8	100.0	994	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

<u>Small Farm Loans</u>

Geographic distribution of small farm loans reflects reasonable penetration throughout the assessment area. While CBI Bank & Trust only originated one small farm loan in the assessment area which was located in an upper-income tract, only 2.5 percent of total farms (6 farms) are located within the 11 moderate-income tracts in the assessment area, and no farms are located in the low-income census tract in the assessment area, presenting very limited opportunities for small farm lending in low- and moderate-income tracts. The vast majority of small farms are located within middle- and upper-income census tracts at 58.8 percent and 38.7 percent, respectively.

The following table presents the geographic distribution of small business loans in the assessment area in 2024.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Janesville-Beloit, WI MSA 27500					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	2.5
Middle	0	0.0	0	0.0	58.8
Upper	1	100.0	250	100.0	38.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	1	100.0	250	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

CBI Bank & Trust demonstrates a distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment area.

<u>HMDA-Reportable Loans</u>

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among borrowers of different income levels. In 2024, CBI Bank & Trust originated no HMDA-reportable loans to low-income borrowers which was significantly below both aggregate lender performance (7.1 percent) and the percentage of low-income families in the assessment area (19.7 percent). The bank made 16.7 percent of its HMDA-reportable loans to moderate-income borrowers, which was below aggregate lender performance (19.9 percent), but consistent with the percentage of moderate-income families in the assessment area (18.8 percent). A total of 20.8 percent of HMDA-reportable loans by number were originated to middle-income borrowers which was below aggregate lender performance (25.1 percent), but comparable to the percentage of middle-income families in the assessment area (22.5 percent). Additionally, the bank made 29.2 percent of HMDA-reportable loans by number to upper-income borrowers which was below both aggregate lender performance (34.4 percent) and the percentage of upper-income families in the assessment area (39.1 percent). The volume of loans originated to borrowers of unknown income (33.3 percent) are as a result of HMDA-reportable loans originated to businesses, which are not required to report income. In comparison, aggregate lenders originated a total of 13.4 percent of HMDA-reportable loans to borrowers of unknown income.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area in 2023 and 2024.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Assessment Area: Janesville-Beloit, WI MSA 27500													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	10.0	0	0.0	5.3	0	0.0	7.1	0	0.0	3.5	19.7
Moderate	1	33.3	22.9	160	32.7	18.9	4	16.7	19.9	663	20.4	15.2	18.8
Middle	0	0.0	25.9	0	0.0	24.8	5	20.8	25.1	470	14.4	23.3	22.5
Upper	2	66.7	31.7	330	67.3	38.4	7	29.2	34.4	1,287	39.6	42.2	39.1
Unknown	0	0.0	9.6	0	0.0	12.7	8	33.3	13.4	833	25.6	15.9	0.0
Total	3	100.0	100.0	490	100.0	100.0	24	100.0	100.0	3,253	100.0	100.0	100.0

Source: 2024 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 Loans

The borrower distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. In 2024, CBI Bank & Trust originated 87.5 percent of its small business loans by number to small businesses reporting annual revenues of $1 million or less, compared to 90.4 percent of total businesses with revenues of $1 million or less operating in the assessment area. Of the bank's seven loans originated to small businesses with revenues of $1 million or less, 71.4 percent were in amounts of $100,000 or less which is generally considered most beneficial to small businesses.

The following table summarizes the bank's 2024 small business lending in the assessment area.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Janesville-Beloit, WI MSA 27500					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	7	87.5	744	74.8	90.4
Over $1 Million	1	12.5	250	25.2	8.4
Revenue Unknown	0	0.0	0	0.0	1.1
Total	8	100.0	994	100.0	100.0
By Loan Size					
$100,000 or Less	5	62.5	108	10.9	
$100,001 - $250,000	1	12.5	250	25.2	
$250,001 - $1 Million	2	25.0	636	64.0	
Total	8	100.0	994	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	5	71.4	108	14.5	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $1 Million	2	28.6	636	85.5	
Total	7	100.0	744	100.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Loans

The borrower distribution of small farm loans reflects reasonable penetration among farms of different revenue sizes. In 2024, CBI Bank & Trust originated one small farm loan in the assessment area which was to a farm with revenue over $1 million. Although the bank made no loans to small farms with revenues of $1 million or less in 2024, CBI Bank & Trust only operates one of its 32 branches in the assessment area. Additionally, the branch has only been operated by CBI Bank & Trust since October 2023, and the bank has limited market share in the assessment area, leaving little opportunity for small farm lending in the assessment area.

The following table summarizes the bank's 2024 small farm lending in the assessment area.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Janesville-Beloit, WI MSA 27500					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	0	0.0	0	0.0	97.5
Over $1 Million	1	100.0	250	100.0	2.5
Revenue Unknown	0	0.0	0	0.0	0.0
Total	1	100.0	250	100.0	100.0
By Loan Size					
$100,000 or Less	0	0.0	0	0.0	
$100,001 - $250,000	1	100.0	250	100.0	
$250,001 - $500,000	0	0.0	0	0.0	
Total	1	100.0	250	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	0	0.0	0	0.0	
$100,001 - $250,000	0	0.0	0	0.0	
$250,001 - $500,000	0	0.0	0	0.0	
Total	0	0.0	0	0.0	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Lending, Investment, and Services Activities

CBI Bank & Trust's community development activities are **outstanding**. The bank demonstrates excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments (donations), and community development services, considering the bank's capacity and the need and availability of such opportunities in the Janesville-Beloit, WI MSA assessment area. As previously mentioned, due to CBI Bank & Trust's acquisition of SENB Bank, the community development evaluation period in this assessment area is a 24-month period from the acquisition date of October 21, 2023, through October 20, 2025.

Lending

CBI Bank & Trust originated five qualified community development loans for approximately $7.9 million in the assessment area during the evaluation period. Of the bank's qualified community development loans, two loans totaling $411,000 were made for affordable housing purposes and three loans totaling $7.5 million were made for revitalization and stabilization purposes. These efforts focused on attracting and retaining businesses and residents to the local area as well as to address the community's housing issue that was highlighted by the community representative. assessment areas.

Investment

No qualified community development investments were made in the Janesville-Beloit, WI MSA assessment area during the review period. Additionally, CBI Bank & Trust had no prior period investments to consider at this evaluation due to this being the first CRA evaluation where the bank delineates the Janesville-Beloit, WI MSA as part of the combined assessment area. However, CBI Bank & Trust made 18 qualified donations that focused on providing vital economic development, affordable housing, and community services totaling $12,337 in the assessment area.

Services

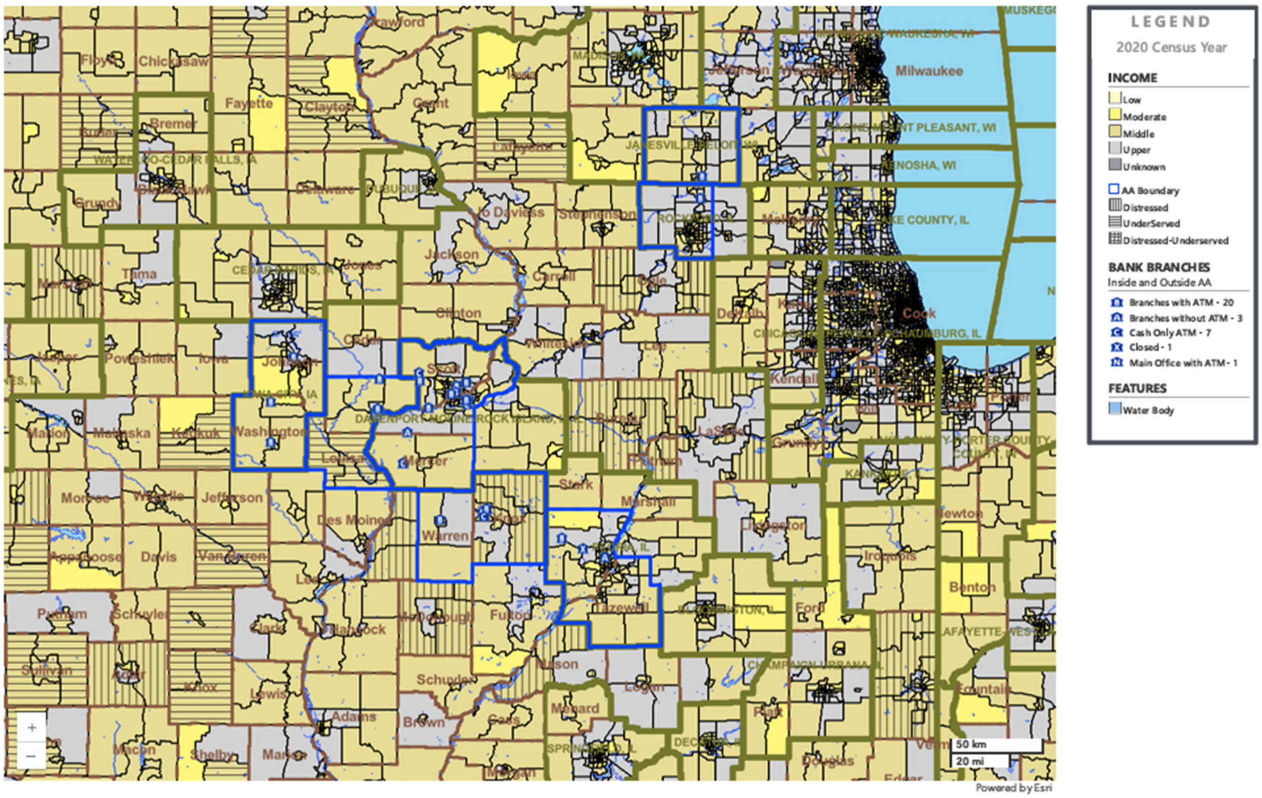
CBI Bank & Trust staff served a total of 397 hours in the assessment area during the evaluation period. Of the total number of service hours, 287 hours were devoted to organizations with a community service focus, and 110 hours were devoted to economic development organizations. Despite only maintaining one branch with limited time in the assessment area, CBI Bank & Trust demonstrates the ability to effectively meet service needs of the community.

The following table presents the bank's community development activities in the assessment area during the review period.

Summary of Community Development Activities from October 21, 2023 – October 20, 2025 Assessment Area: Janesville-Beloit, WI MSA 27500										
Type of Activity	Affordable Housing		Economic Development		Revitalize and Stabilize		Community Service		Totals	
	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours	#	$/Hours
Lending	2	411,000	0	0	3	7,484,000	0	0	5	7,895,000
Investments	0	0	0	0	0	0	0	0	0	0
Donations	3	2,719	5	4,583	0	0	10	5,036	18	12,337
Services	0	0	3	110	0	0	11	287	14	397

APPENDIX A – Maps of the Assessment Areas

CBI Bank & Trust 830542
Combined Assessment Area



APPENDIX B – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	• HMDA Reportable Lending: January 1, 2023 – December 31, 2024 o January 1, 2024 – December 31, 2024 (Davenport-Moline-Rock Island, IA-IL MSA, Rockford, IL MSA, Janesville-Beloit, WI MSA) • Small Business Lending: January 1, 2024 – December 31, 2024 • Small Farm Lending: January 1, 2024 – December 31, 2024 • Community Development Activities: July 18, 2022 – October 20, 2025 o October 21, 2023 – October 20, 2025 (Rockford, IL MSA, Janesville-Beloit, WI MSA)		
FINANCIAL INSTITUTION CBI Bank & Trust			**PRODUCTS REVIEWED** • HMDA Reportable Lending • Small Business Lending • Small Farm Lending • Community Development Activities
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED**
None	**N/A**		**N/A**
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	**TYPE OF EXAMINATION**	**BRANCHES VISITED**	**OTHER INFORMATION**
Davenport-Moline-Rock Island, IA-IL MSA #19340	**Full scope**	**N/A**	**N/A**
State of Iowa **Iowa Non-MSA** **Iowa City, IA MSA #26980**	 **Full scope** **Limited Scope**	**N/A**	**N/A**

State of Illinois **Galesburg, IL Non-MSA** **Peoria, IL MSA #37900** **Rockford, IL MSA #40420**	 **Full scope** **Limited Scope** **Limited Scope**	**N/A**	**N/A**
State of Wisconsin **Janesville-Beloit, WI MSA #27500**	 **Full scope**	**N/A**	**N/A**

APPENDIX C – 2023 Demographics Tables

2023 Combined AA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	24	6.5	11,463	3.3	4,968	43.3	71,573	20.6
Moderate	101	27.2	76,782	22.0	12,098	15.8	64,488	18.5
Middle	166	44.7	169,476	48.7	11,963	7.1	74,110	21.3
Upper	75	20.2	89,674	25.7	2,854	3.2	138,098	39.7
Unknown	5	1.3	874	0.3	427	48.9	0	0.0
Total AA	**371**	**100.0**	**348,269**	**100.0**	**32,310**	**9.3**	**348,269**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	29,081	6,976	1.8	24.0	16,725	57.5	5,380	18.5
Moderate	150,406	73,594	19.4	48.9	60,604	40.3	16,208	10.8
Middle	295,232	196,105	51.7	66.4	74,800	25.3	24,327	8.2
Upper	136,248	101,935	26.9	74.8	26,180	19.2	8,133	6.0
Unknown	4,424	379	0.1	8.6	3,153	71.3	892	20.2
Total AA	**615,391**	**378,989**	**100.0**	**61.6**	**181,462**	**29.5**	**54,940**	**8.9**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,590	5.2	2,205	5.0	363	8.3	22	3.8
Moderate	10,969	22.2	9,784	22.0	1,091	24.8	94	16.2
Middle	22,100	44.8	19,987	45.0	1,785	40.7	328	56.6
Upper	12,737	25.8	11,590	26.1	1,024	23.3	123	21.2
Unknown	954	1.9	814	1.8	128	2.9	12	2.1
Total AA	**49,350**	**100.0**	**44,380**	**100.0**	**4,391**	**100.0**	**579**	**100.0**
Percentage of Total Businesses:				**89.9**		**8.9**		**1.2**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	0.3	6	0.3	0	0.0	0	0.0
Moderate	218	9.4	215	9.4	3	8.8	0	0.0
Middle	1,414	61.1	1,393	61.1	18	52.9	3	100.0
Upper	677	29.2	664	29.1	13	38.2	0	0.0
Unknown	1	0.0	1	0.0	0	0.0	0	0.0
Total AA	**2,316**	**100.0**	**2,279**	**100.0**	**34**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**98.4**		**1.5**		**0.1**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2023 Davenport-Moline-Rock Island, IA-IL MSA 19340 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	3.2	1,357	1.6	515	38.0	16,642	19.7
Moderate	28	29.5	17,530	20.8	2,963	16.9	15,817	18.7
Middle	48	50.5	46,598	55.2	3,729	8.0	17,920	21.2
Upper	15	15.8	18,822	22.3	704	3.7	34,048	40.3
Unknown	1	1.1	120	0.1	29	24.2	0	0.0
Total AA	**95**	**100.0**	**84,427**	**100.0**	**7,940**	**9.4**	**84,427**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,980	972	1.0	32.6	1,487	49.9	521	17.5
Moderate	35,223	16,779	17.9	47.6	14,172	40.2	4,272	12.1
Middle	80,295	54,051	57.8	67.3	19,564	24.4	6,680	8.3
Upper	28,590	21,680	23.2	75.8	4,892	17.1	2,018	7.1
Unknown	1,188	74	0.1	6.2	850	71.5	264	22.2
Total AA	**148,276**	**93,556**	**100.0**	**63.1**	**40,965**	**27.6**	**13,755**	**9.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	303	2.4	246	2.2	54	4.9	3	1.7
Moderate	2,788	22.4	2,456	22.0	304	27.6	28	16.0
Middle	5,984	48.1	5,397	48.3	490	44.4	97	55.4
Upper	2,991	24.0	2,742	24.5	210	19.0	39	22.3
Unknown	382	3.1	329	2.9	45	4.1	8	4.6
Total AA	**12,448**	**100.0**	**11,170**	**100.0**	**1,103**	**100.0**	**175**	**100.0**
Percentage of Total Businesses:				**89.7**		**8.9**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	6	1.2	6	1.3	0	0.0	0	0.0
Middle	295	61.0	294	61.5	1	16.7	0	0.0
Upper	180	37.2	175	36.6	5	83.3	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**484**	**100.0**	**478**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.8**		**1.2**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2023 IA Non MSA AA 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	2,691	19.0
Moderate	3	23.1	3,232	22.8	589	18.2	2,642	18.6
Middle	9	69.2	9,757	68.8	566	5.8	3,145	22.2
Upper	1	7.7	1,186	8.4	0	0.0	5,697	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13**	**100.0**	**14,175**	**100.0**	**1,155**	**8.1**	**14,175**	**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	5,186	3,006	19.2	58.0	1,690	32.6	490	9.4
Middle	15,947	11,035	70.6	69.2	3,194	20.0	1,718	10.8
Upper	2,129	1,584	10.1	74.4	377	17.7	168	7.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**23,262**	**15,625**	**100.0**	**67.2**	**5,261**	**22.6**	**2,376**	**10.2**
	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	439	21.8	381	21.1	55	32.7	3	8.6
Middle	1,427	71.0	1,287	71.2	108	64.3	32	91.4
Upper	145	7.2	140	7.7	5	3.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,011**	**100.0**	**1,808**	**100.0**	**168**	**100.0**	**35**	**100.0**
Percentage of Total Businesses:				**89.9**		**8.4**		**1.7**
	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	4	1.6	4	1.7	0	0.0	0	0.0
Middle	234	95.5	231	95.5	2	100.0	1	100.0
Upper	7	2.9	7	2.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**245**	**100.0**	**242**	**100.0**	**2**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**0.8**		**0.4**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2023 Iowa City, IA MSA 26980 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.1	914	2.3	434	47.5	8,083	20.7
Moderate	14	33.3	11,001	28.2	1,121	10.2	7,244	18.6
Middle	13	31.0	12,517	32.1	598	4.8	8,750	22.4
Upper	12	28.6	14,551	37.3	420	2.9	14,906	38.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**42**	**100.0**	**38,983**	**100.0**	**2,573**	**6.6**	**38,983**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,078	596	1.4	11.7	3,807	75.0	675	13.3
Moderate	23,534	9,891	23.8	42.0	11,833	50.3	1,810	7.7
Middle	23,443	14,429	34.8	61.5	7,508	32.0	1,506	6.4
Upper	22,623	16,596	40.0	73.4	4,646	20.5	1,381	6.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**74,678**	**41,512**	**100.0**	**55.6**	**27,794**	**37.2**	**5,372**	**7.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	497	6.7	454	6.6	40	8.8	3	3.9
Moderate	2,366	32.0	2,163	31.5	182	39.8	21	27.6
Middle	2,231	30.2	2,073	30.2	131	28.7	27	35.5
Upper	2,305	31.2	2,176	31.7	104	22.8	25	32.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7,399**	**100.0**	**6,866**	**100.0**	**457**	**100.0**	**76**	**100.0**
Percentage of Total Businesses:				**92.8**		**6.2**		**1.0**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	149	26.5	147	26.5	2	28.6	0	0.0
Middle	297	52.8	291	52.5	5	71.4	1	100.0
Upper	114	20.3	114	20.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**562**	**100.0**	**554**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.6**		**1.2**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2023 IL Non MSA AA 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	3,258	20.4
Moderate	3	14.3	1,447	9.1	267	18.5	3,066	19.2
Middle	15	71.4	13,081	82.0	1,272	9.7	3,655	22.9
Upper	2	9.5	1,315	8.2	45	3.4	5,973	37.4
Unknown	1	4.8	109	0.7	37	33.9	0	0.0
Total AA	**21**	**100.0**	**15,952**	**100.0**	**1,621**	**10.2**	**15,952**	**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	3,346	1,405	7.5	42.0	1,228	36.7	713	21.3
Middle	25,009	15,656	83.7	62.6	6,195	24.8	3,158	12.6
Upper	2,074	1,570	8.4	75.7	242	11.7	262	12.6
Unknown	1,144	73	0.4	6.4	848	74.1	223	19.5
Total AA	**31,573**	**18,704**	**100.0**	**59.2**	**8,513**	**27.0**	**4,356**	**13.8**
	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	182	9.0	144	8.0	35	20.1	3	6.3
Middle	1,487	73.1	1,339	73.9	107	61.5	41	85.4
Upper	120	5.9	111	6.1	7	4.0	2	4.2
Unknown	244	12.0	217	12.0	25	14.4	2	4.2
Total AA	**2,033**	**100.0**	**1,811**	**100.0**	**174**	**100.0**	**48**	**100.0**
Percentage of Total Businesses:				**89.1**		**8.6**		**2.4**
	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	1	0.4	1	0.4	0	0.0	0	0.0
Middle	201	77.3	199	77.4	2	66.7	0	0.0
Upper	58	22.3	57	22.2	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**260**	**100.0**	**257**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.8**		**1.2**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2023 Peoria, IL MSA 37900 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	11.4	4,022	5.1	1,698	42.2	15,798	20.0
Moderate	17	21.5	14,744	18.7	2,018	13.7	14,724	18.7
Middle	38	48.1	41,453	52.5	2,358	5.7	16,734	21.2
Upper	15	19.0	18,724	23.7	464	2.5	31,687	40.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**79**	**100.0**	**78,943**	**100.0**	**6,538**	**8.3**	**78,943**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	10,532	2,509	2.8	23.8	5,554	52.7	2,469	23.4
Moderate	29,855	16,922	19.0	56.7	8,985	30.1	3,948	13.2
Middle	73,421	49,404	55.5	67.3	17,339	23.6	6,678	9.1
Upper	28,813	20,255	22.7	70.3	6,548	22.7	2,010	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**142,621**	**89,090**	**100.0**	**62.5**	**38,426**	**26.9**	**15,105**	**10.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,048	10.3	857	9.5	182	17.3	9	7.4
Moderate	1,691	16.6	1,539	17.1	134	12.7	18	14.8
Middle	5,061	49.7	4,527	50.2	461	43.7	73	59.8
Upper	2,391	23.5	2,092	23.2	277	26.3	22	18.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10,191**	**100.0**	**9,015**	**100.0**	**1,054**	**100.0**	**122**	**100.0**
Percentage of Total Businesses:				**88.5**		**10.3**		**1.2**
	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	41	11.5	40	11.4	1	16.7	0	0.0
Middle	225	63.0	220	62.9	4	66.7	1	100.0
Upper	91	25.5	90	25.7	1	16.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**357**	**100.0**	**350**	**100.0**	**6**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.0**		**1.7**		**0.3**

Source: *2023 FFIEC Census Data*
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

2023 Rockford, IL MSA 40420 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	10.0	5,038	6.8	2,278	45.2	16,937	22.8
Moderate	25	31.3	19,398	26.1	3,676	19.0	13,203	17.8
Middle	23	28.8	24,474	33.0	1,777	7.3	14,553	19.6
Upper	21	26.3	24,690	33.3	734	3.0	29,552	39.8
Unknown	3	3.8	645	0.9	361	56.0	0	0.0
Total AA	**80**	**100.0**	**74,245**	**100.0**	**8,826**	**11.9**	**74,245**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,874	2,808	3.7	28.4	5,464	55.3	1,602	16.2
Moderate	36,020	16,842	22.2	46.8	15,368	42.7	3,810	10.6
Middle	41,487	27,448	36.2	66.2	11,724	28.3	2,315	5.6
Upper	36,230	28,547	37.6	78.8	5,880	16.2	1,803	5.0
Unknown	2,092	232	0.3	11.1	1,455	69.6	405	19.4
Total AA	**125,703**	**75,877**	**100.0**	**60.4**	**39,891**	**31.7**	**9,935**	**7.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	546	5.5	475	5.3	68	6.9	3	4.9
Moderate	2,632	26.3	2,292	25.6	322	32.7	18	29.5
Middle	3,264	32.6	2,982	33.3	266	27.0	16	26.2
Upper	3,233	32.3	2,940	32.8	271	27.5	22	36.1
Unknown	328	3.3	268	3.0	58	5.9	2	3.3
Total AA	**10,003**	**100.0**	**8,957**	**100.0**	**985**	**100.0**	**61**	**100.0**
Percentage of Total Businesses:				**89.5**		**9.8**		**0.6**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.3	2	1.3	0	0.0	0	0.0
Moderate	11	6.9	11	7.0	0	0.0	0	0.0
Middle	15	9.4	15	9.6	0	0.0	0	0.0
Upper	132	82.5	129	82.2	3	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**160**	**100.0**	**157**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.1**		**1.9**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2023 Janesville-Beloit, WI MSA 27500 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.4	132	0.3	43	32.6	8,164	19.7
Moderate	11	26.8	9,430	22.7	1,464	15.5	7,792	18.8
Middle	20	48.8	21,596	52.0	1,663	7.7	9,353	22.5
Upper	9	22.0	10,386	25.0	487	4.7	16,235	39.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**41**	**100.0**	**41,544**	**100.0**	**3,657**	**8.8**	**41,544**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	617	91	0.2	14.7	413	66.9	113	18.3
Moderate	17,242	8,749	19.6	50.7	7,328	42.5	1,165	6.8
Middle	35,630	24,082	54.0	67.6	9,276	26.0	2,272	6.4
Upper	15,789	11,703	26.2	74.1	3,595	22.8	491	3.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**69,278**	**44,625**	**100.0**	**64.4**	**20,612**	**29.8**	**4,041**	**5.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	196	3.7	173	3.6	19	4.2	4	6.5
Moderate	871	16.5	809	17.0	59	13.1	3	4.8
Middle	2,646	50.3	2,382	50.1	222	49.3	42	67.7
Upper	1,552	29.5	1,389	29.2	150	33.3	13	21.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**5,265**	**100.0**	**4,753**	**100.0**	**450**	**100.0**	**62**	**100.0**
Percentage of Total Businesses:				**90.3**		**8.5**		**1.2**
	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	6	2.4	6	2.5	0	0.0	0	0.0
Middle	147	59.3	143	59.3	4	57.1	0	0.0
Upper	95	38.3	92	38.2	3	42.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**248**	**100.0**	**241**	**100.0**	**7**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.2**		**2.8**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX D – Glossary

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the "five-year estimate data." The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.[1]

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit

[1] *Source: FFIEC press release dated October 19, 2011.*

Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

Census tract: Small subdivisions 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. They 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 (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non-metropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and 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; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

   Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

   1) Low- or moderate-income geographies;
   2) Designated disaster areas; or

3) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:
   a. Rates of poverty, unemployment or population loss; or
   b. Population size, density and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

1) Has as its primary purpose community development; and
2) Except in the case of a wholesale or limited purpose bank –
   a. Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
   b. Benefits the bank's assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s).

Community Development Service: A community development service means a service that:

1) Has as its primary purpose community development; and
2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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 household and no wife present) or "female householder" (a family with a female householder and no husband present).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

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

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

1) Low-income – an 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 census tract;
2) Moderate-income – an 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 census tract;

3) Middle-income – an 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 census tract; and
4) Upper-income – an individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent in the case of a census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment, and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

1) Consumer loan is located in the census tract where the borrower resides;
2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan production office (LPO): This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area: A metropolitan statistical area (**MSA**) or a metropolitan division (**MD**) as defined by the Office of Management and Budget. A 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. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than $1.252 billion. Intermediate small bank means a small bank with assets of at least $313 million as of December 31 of both of the prior two calendar years and less than $1.252 billion as of December 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of $1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of $500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).