

PUBLIC DISCLOSURE

December 2, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**FCNB Bank
RSSD #619859**

**402 West Main Street
Steelville, Missouri 65565**

Federal Reserve Bank of St. Louis

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. 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 institution.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans and other lending-related activities are originated inside the AAs.
- The borrower's profile analysis reveals reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- The geographic distribution of loans reflects an excellent dispersion throughout the AAs.
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. Bank performance under this test is rated within each of the bank's AAs. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each AA completed as part of this evaluation.

Assessment Area	Offices		Deposits as of June 30, 2024		Review Procedures
	#	%	\$	%	
Southeast Missouri	4	66.7	121,946	72.8	Full Scope
St. Louis	2	33.3	45,523	27.2	Limited Scope
TOTAL	6	100.0	167,469	100.0	1 – Full Scope

In light of branch structure, loan and deposit activity, and the bank's CRA evaluation history, CRA performance in the Southeast Missouri AA was reviewed using full-scope examination procedures, as it contains the bank's headquarters in addition to the majority of the bank's branches and deposit activity. The St. Louis AA was reviewed using limited-scope procedures.

The bank's lending performance was evaluated using small business and 1–4 family residential real estate loans, as these loan categories are considered the bank's core business lines based on lending volume and the bank's stated business strategy. Furthermore, as small business lending activity represents a higher volume by number and dollar amount, it carries more weight than 1–4

family residential real estate lending when making overall performance conclusions. The following table includes the corresponding time period for each performance category.

Performance Criterion	Time Period
LTD Ratio	June 30, 2019 – September 30, 2024
AA Concentration	January 1, 2022 – December 31, 2023
Loan Distribution by Borrower’s Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	May 13, 2019 – December 1, 2024

Lending Test analyses often entail comparisons of bank performance to AA demographics and the performance of other lenders, based on Home Mortgage Disclosure Act (HMDA) and CRA aggregate lending data. Unless otherwise noted, AA demographics are based on 2020 American Community Survey data, and certain business demographics are based on 2022 and 2023 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are updated annually and are, therefore, expected to predict more relevant comparisons. The aggregate lending data relied upon in this analysis is the combined aggregate data of 2022 and 2023. In addition, the bank’s lending levels were evaluated in relation to those of comparable financial institutions operating in the same general region. Four other banks were identified as similarly situated peers, with asset sizes ranging from \$142.6 million to \$423.9 million as of September 30, 2024.

To augment this evaluation, one community contact interview was conducted with a member of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank’s Southeast Missouri AA. Key details from this community contact interview are included in the *Description of Assessment Area* section for the Southeast Missouri AA.

DESCRIPTION OF INSTITUTION

FCNB Bank is an intrastate community bank headquartered in Steelville, Missouri. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of Steelville Community Banc-Shares, Inc., Steelville, Missouri.
- The bank has total assets of \$197.0 million as of September 30, 2024. That represents an increase of 48.1 percent since the last evaluation.
- In addition to its main office in Steelville, the bank has five offices located in Cuba, Sullivan, Eureka, and Rolla. No offices were opened or closed since the last evaluation.
- Each branch is equipped with a full-service ATM.

- As shown in the following table, the bank's primary business focus is commercial and 1–4 family residential real estate lending.

Composition of Loan Portfolio as of September 30, 2024		
Loan Type	Amount \$ (000s)	Percentage of Total Loans (%)
Commercial Real Estate	37,388	33.4
1–4 Family Residential	32,573	29.1
Commercial and Industrial	15,373	13.7
Farmland	11,736	10.5
Loans to Individuals	5,279	4.7
Construction and Development	4,886	4.4
Farm Loans	2,752	2.5
Multifamily Residential	1,903	1.7
Total Other Loans	15	0.0
TOTAL	111,905	100.0
<i>Note: Percentages may not total 100.0% due to rounding.</i>		

The bank was rated Outstanding under the CRA by the Office of the Comptroller of the Currency at its May 13, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's overall performance under the Lending Test is Satisfactory.

Loan-to-Deposit (LTD) Ratio

This performance criterion evaluates the bank's average LTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on branch location, asset size, and loan portfolio.

Comparative LTD Ratios [June 30, 2019 – September 30, 2024]			
Institution	Location	Asset Size \$ (000s)	LTD Ratio (%)
			22-Quarter Average
FCNB Bank	Steelville, Missouri	197,025	53.1
Similarly Situated Institutions			
Regional Banks	St. Robert, Missouri	149,244	67.1
	Eminence, Missouri	151,059	66.9
	Warrenton, Missouri	423,855	66.8
	Waynesville, Missouri	142,585	37.1

The bank's LTD ratio is reasonable. The bank experienced a 22-quarter average of 53.1 percent; however, the quarterly LTD ratio steadily increased from a low (46.3 percent) in the fourth quarter of 2020 to a high (67.0 percent) in the most recent quarter (third quarter of 2024). While the bank's average LTD ratio lags three of the similarly situated regional banks used for comparison, its most recent quarterly LTD ratio is now in line with those same institutions.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
Small Business	75	72.1	13,452	76.6	29	27.9	4,118	23.4
1–4 Family Residential Real Estate	44	78.6	6,821	67.9	12	21.4	3,222	32.1
TOTAL LOANS	119	74.4	20,273	73.4	41	25.6	7,339	26.6
<i>Note: Percentages may not total 100.0% due to rounding.</i>								

A majority of the bank's loans, by number and dollar amount, are originated inside the AAs. Overall, 74.4 percent of the total loans were originated inside the AAs, accounting for 73.4 percent of the total dollar volume of loans.

Borrower and Geographic Distribution

The bank's performance by borrower's income/revenue profile is reasonable, based on the analyses of lending in the bank's full-scope AA.

Full-Scope Assessment Area	Loan Distribution by Borrower's Profile
Southeast Missouri	Reasonable

Limited-Scope Assessment Area	Loan Distribution by Borrower's Profile
St. Louis	Consistent

The bank's distribution of lending by income level of census tract reflects excellent penetration throughout the rated AA subject to review.

Full-Scope Assessment Area	Geographic Distribution of Loans
Southeast Missouri	Excellent

Limited-Scope Assessment Area	Geographic Distribution of Loans
St. Louis	Below

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

SOUTHEAST MISSOURI NONMETROPOLITAN STATISTICAL AREA (Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTHEAST MISSOURI ASSESSMENT AREA

The bank's Southeast Missouri AA consists of the entire Phelps and Crawford counties (see Appendix B for an AA map).

- Since the prior evaluation, a moderate-income census tract located near the branches in Phelps County was redesignated by being split into a low-income census tract and a moderate-income census tract, resulting in a single low-income census tract in the AA.
- According to the June 30, 2024 Federal Deposit Market Share Report, the bank has a market share of 7.4 percent, which ranks sixth out of 12 FDIC-insured depository institutions operating in the AA.
- According to the U.S. Department of Labor, Bureau of Labor Statistics, Quarterly Census of Employment and Wages data, the three largest nongovernmental industries in the AA, determined by number of employees, are retail trade (18.5 percent), health care and social assistance (14.6 percent), and manufacturing (13.7 percent).
- One community contact interview was conducted with an individual from an economic development organization.

Assessment Area Demographics by Geography Income Level						
Assessment Area: Southeast Missouri						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	1	5	9	5	0	20
	5.0%	25.0%	45.0%	25.0%	0.0%	100.0%
Family Population	118	3,650	9,062	4,840	0	17,670
	0.7%	20.7%	51.3%	27.4%	0.0%	100.0%

- As shown in the table above, 30.0 percent of the census tracts are LMI geographies, with 21.4 percent of the AA family population residing in these tracts.
- Three of the moderate-income census tracts are located in Crawford County. The low-income census tract and the remaining two moderate-income tracts are located in Phelps County.

Population Change			
Assessment Area: Southeast Missouri			
Area	2015 Population	2020 Population	Percent Change (%)
Assessment Area	69,689	67,694	-2.9
Crawford County	24,660	23,056	-6.5
Phelps County	45,029	44,638	-0.9
NonMSA Missouri	1,550,288	1,505,909	-2.9
Missouri	6,045,448	6,154,913	1.8
Source: 2020 U.S. Census Bureau: Decennial Census 2011–2015 U.S. Census Bureau: American Community Survey			

- As shown in the table above, the AA experienced a declining population trend, decreasing 2.9 percent, with Crawford County experiencing a higher rate of decline (6.5 percent). The nonMSA Missouri population as a whole experienced a similar decline. Conversely, the state of Missouri experienced a population increase of 1.8 percent during the same period.

Median Family Income Change			
Assessment Area: Southeast Missouri			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change (%)
Assessment Area	54,764	57,011	4.1
Crawford County	49,166	49,947	1.6
Phelps County	58,277	60,228	3.3
NonMSA Missouri	52,816	56,957	7.8
Missouri	66,438	72,834	9.6
Source: 2011–2015 U.S. Census Bureau: American Community Survey 2016–2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- As shown in the table above, the median family income growth in the AA trailed nonMSA Missouri and the state of Missouri. Nonetheless, the median family income of the AA (\$57,011) is similar to the median family income of nonMSA Missouri (\$56,957). However, both figures are significantly less than the median family income of Missouri (\$72,834).
- The median family income figures align with community contact information, which indicates that Crawford County experiences higher poverty levels than Phelps County.

Unemployment Rates (%)					
Assessment Area: Southeast Missouri					
Area	2019	2020	2021	2022	2023
Assessment Area	3.4	5.4	3.8	2.7	3.2
Crawford County	3.7	6.5	4.3	2.9	3.4
Phelps County	3.2	4.8	3.6	2.6	3.1
NonMSA Missouri	3.9	6.2	4.2	2.9	3.5
Missouri	3.2	6.2	4.2	2.6	3.1
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- As shown in the table above, all areas reviewed experienced a spike in unemployment in 2020 due to the COVID-19 pandemic; however, unemployment subsequently declined and is now slightly below pre-pandemic levels.

Housing Cost Burden (%)						
Assessment Area: Southeast Missouri						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	71.7	33.6	40.7	58.7	30.0	17.6
Crawford County	68.1	31.8	37.3	56.3	39.9	20.8
Phelps County	73.0	34.1	42.0	60.5	24.5	15.6
NonMSA Missouri	65.6	30.7	35.2	54.7	25.5	16.3
Missouri	74.0	30.3	39.6	58.6	26.5	16.1
<i>Cost burden is housing cost that equals 30% or more of household income.</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017–2021 Comprehensive Housing Affordability Strategy</i>						

- As shown in the table above, renters and homeowners in the AA have similar, yet slightly higher, cost burden levels compared to those in the state of Missouri, while rates for nonMSA Missouri are consistently lower.
- The cost burden data in the table above aligns with information provided by the community contact, who noted that both Crawford and Phelps counties are in need of more affordable housing.

Home Mortgage Loan Trends					
Assessment Area: Southwest Missouri					
Area	2019	2020	2021	2022	2023
Assessment Area	961	1,376	1,644	1,064	712
Crawford County	428	608	720	458	286
Phelps County	533	768	924	606	426
NonMSA Missouri	26,730	39,933	43,036	28,797	20,298
Missouri	157,870	257,007	253,652	136,736	96,068
<i>Source: FFIEC Home Mortgage Disclosure Act Aggregate Data</i>					

- As shown in the table above, the number of home mortgage loans substantially decreased in 2022 and continued to decline through 2023.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHEAST MISSOURI ASSESSMENT AREA

Loan Distribution by Borrower's Profile

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

Small Business Lending

The borrower distribution of small business lending is reasonable. As displayed in the following table, the bank's lending to small businesses (73.1 percent) exceeds the aggregate (54.4 percent) but trails the demographic comparator (92.3 percent).

Distribution of 2022–2023 Small Business Lending by Revenue Size of Businesses									
Assessment Area: Southeast Missouri									
Business Revenue and Loan Size			Count		Dollars			Total Businesses	
			Bank		Aggregate	Bank			Aggregate
			#	%	%	\$ (000s)	\$ %		\$ %
Business Revenue	\$1 Million or Less		49	73.1	54.4	7,486	58.4	40.0	92.3
	Over \$1 Million/ Unknown		18	26.9	45.6	5,331	41.6	60.0	7.7
	TOTAL		67	100.0	100.0	12,817	100.0	100.0	100.0
Loan Size	\$100,000 or Less		32	47.8	93.9	1,549	12.1	38.2	
	\$100,001–\$250,000		19	28.4	3.0	3,042	23.7	14.4	
	\$250,001–\$1 Million		16	23.9	3.1	8,226	64.2	47.3	
	Over \$1 Million		0	0.0	0.0	0	0.0	0.0	
	TOTAL		67	100.0	100.0	12,817	100.0	100.0	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less		27	55.1		1,212	16.2		
	\$100,001–\$250,000		14	28.6		2,173	29.0		
	\$250,001–\$1 Million		8	16.3		4,101	54.8		
	Over \$1 Million		0	0.0		0	0.0		
	TOTAL		49	100.0		7,486	100.0		
Source: 2022 and 2023 FFIEC Census Data 2022 and 2023 Dun & Bradstreet Data 2016–2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding.									

Residential Real Estate Lending

The bank's residential real estate loan distribution is reasonable. The bank's lending performance to low-income borrowers (2.9 percent) trails the aggregate (5.0 percent) and significantly trails the demographic comparator (20.1 percent), which is poor. However, the bank's lending performance to moderate-income borrowers (20.0 percent) exceeds the aggregate (18.0 percent) and demographic comparator (17.8 percent), which is reasonable. Furthermore, rising interest rates and a lack of affordable housing, as noted by the community contact, combined with declining mortgage lending trends in 2022 and 2023, support the bank's reasonable performance.

Distribution of 2022–2023 Residential Real Estate Lending by Borrower Income Level Assessment Area: Southeast Missouri							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Aggregate	Bank		Aggregate	
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	1	2.9	5.0	63	1.1	2.4	20.1
Moderate	7	20.0	18.0	646	11.1	11.9	17.8
Middle	3	8.6	22.5	204	3.5	19.0	20.6
Upper	24	68.6	34.2	4,924	84.4	40.3	41.6
Unknown	0	0.0	20.4	0	0.0	26.5	0.0
TOTAL	35	100.0	100.0	5,837	100.0	100.0	100.0
Source: 2022 and 2023 FFIEC Census Data 2016–2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Geographic Distribution of Loans

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

Small Business Lending

The geographic distribution of small business lending is excellent. The bank’s lending to small businesses in low-income census tracts (4.5 percent) almost doubles both the aggregate (2.4 percent) and the demographic comparator (2.3 percent). Similarly, the bank’s lending to small businesses in moderate-income census tracts (29.9 percent) exceeds both the aggregate (21.0 percent) and the demographic comparator (25.1 percent).

Distribution of 2022–2023 Small Business Lending by Income Level of Geography Assessment Area: Southeast Missouri							
Tract Income Levels	Count			Dollar			Total Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	3	4.5	2.4	1,292	10.1	4.0	2.3
Moderate	20	29.9	21.0	3,831	29.9	24.9	25.1
Middle	34	50.7	50.0	5,728	44.7	54.9	52.2
Upper	10	14.9	24.8	1,966	15.3	15.5	20.4
Unknown	0	0.0	1.7	0	0.0	0.6	0.0
TOTAL	67	100.0	100.0	12,817	100.0	100.0	100.0
Source: 2022 and 2023 FFIEC Census Data 2022 and 2023 Dun & Bradstreet Data 2016–2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding.							

Residential Real Estate Lending

The geographic distribution of home mortgage lending is excellent. The bank's distribution of residential real estate loans to low-income census tracts (0.0 percent) is comparable to the aggregate (0.6 percent) and the demographic figure (0.4 percent), representing reasonable performance, considering that the low aggregate and demographic levels suggest limited mortgage lending opportunities in the area. The bank's distribution of residential real estate loans to moderate-income census tracts (25.7 percent) exceeds both the aggregate (20.7 percent) and the demographic figure (17.0 percent), which is excellent. On a combined basis, the bank's distribution of residential real estate loans to LMI census tracts (25.7 percent) exceeds both the aggregate (21.3 percent) and the demographic figure (17.4 percent).

Distribution of 2022–2023 Residential Real Estate Lending by Income Level of Geography Assessment Area: Southeast Missouri							
Geographic Income Level	Bank and Aggregate Loans						Owner- Occupied Units %
	Bank		Aggregate	Bank		Aggregate	
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	0	0.0	0.6	0	0.0	0.7	0.4
Moderate	9	25.7	20.7	1,131	19.4	22.9	17.0
Middle	16	45.7	48.9	2,946	50.5	46.8	52.9
Upper	10	28.6	29.8	1,761	30.2	29.6	29.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
TOTAL	35	100.0	100.0	5,837	100.0	100.0	100.0
<i>Source: 2022 and 2023 FFIEC Census Data 2016–2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding.</i>							

ST. LOUIS, MISSOURI-ILLINOIS METROPOLITAN STATISTICAL AREA (Limited-Scope Review)

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

This AA includes portions of St. Louis, Franklin, and Jefferson counties, which are 3 of the 15 counties that make up the St. Louis, Missouri-Illinois MSA. The bank operates two offices in this AA. The tables below detail key demographics relating to this AA.

Population Change Assessment Area: St. Louis			
Area	2015 Population	2020 Population	Percent Change (%)
Assessment Area	1,324,732	1,335,546	0.8
Franklin County	101,828	104,682	2.8
Jefferson County	221,577	226,739	2.3
St. Louis County	1,001,327	1,004,125	0.3
St. Louis, Missouri-Illinois MSA	2,801,914	2,820,253	0.7
Missouri	6,045,448	6,154,913	1.8
Source: 2020 U.S. Census Bureau: Decennial Census 2011–2015 U.S. Census Bureau: American Community Survey			

Median Family Income Change Assessment Area: St. Louis			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change (%)
Assessment Area	79,608	85,171	7.0
Franklin County	66,343	75,886	14.4
Jefferson County	70,623	77,466	9.7
St. Louis County	84,564	90,540	7.1
St. Louis, Missouri-Illinois MSA	77,265	84,758	9.7
Missouri	66,438	72,834	9.6
Source: 2011–2015 U.S. Census Bureau: American Community Survey 2016–2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

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

The bank's Lending Test performance in this AA is consistent with the bank's Lending Test performance in the Southeast Missouri AA that was reviewed using full-scope procedures, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this AA, see the tables in Appendix A.

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

**APPENDIX A – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE
REVIEW ASSESSMENT AREA**

St. Louis Assessment Area

Distribution of 2022–2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2022–2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	6	75.0	53.5	533	83.9	31.6	92.5
	Over \$1 Million/ Unknown	2	25.0	46.5	102	16.1	68.4	7.5
	TOTAL	8	100.0	100.0	635	100.0	100.0	100.0
Loan Size	\$100,000 or Less	5	62.5	92.4	146	23.0	31.5	
	\$100,001–\$250,000	3	37.5	3.7	489	77.0	14.5	
	\$250,001–\$1 Million	0	0.0	3.9	0	0.0	54.0	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	8	100.0	100.0	635	100.0	100.0	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	50.0		44	8.3	
		\$100,001–\$250,000	3	50.0		489	91.7	
		\$250,001–\$1 Million	0	0.0		0	0.0	
		Over \$1 Million	0	0.0		0	0.0	
		TOTAL	6	100.0		533	100.0	
Source: 2022 and 2023 FFIEC Census Data 2022 and 2023 Dun & Bradstreet Data 2016–2020 U.S. Census Bureau: American Community Survey								

Distribution of 2022–2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	3	33.3	12.0	356	36.2	6.3	19.5
Moderate	1	11.1	20.7	228	23.1	15.4	21.0
Middle	0	0.0	20.7	0	0.0	20.7	23.3
Upper	5	55.6	27.9	400	40.7	37.6	36.2
Unknown	0	0.0	18.7	0	0.0	20.0	0.0
TOTAL	9	100.0	100.0	984	100.0	100.0	100.0
<i>Source: 2022 and 2023 FFIEC Census Data</i> <i>2016–2020 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0% due to rounding.</i>							

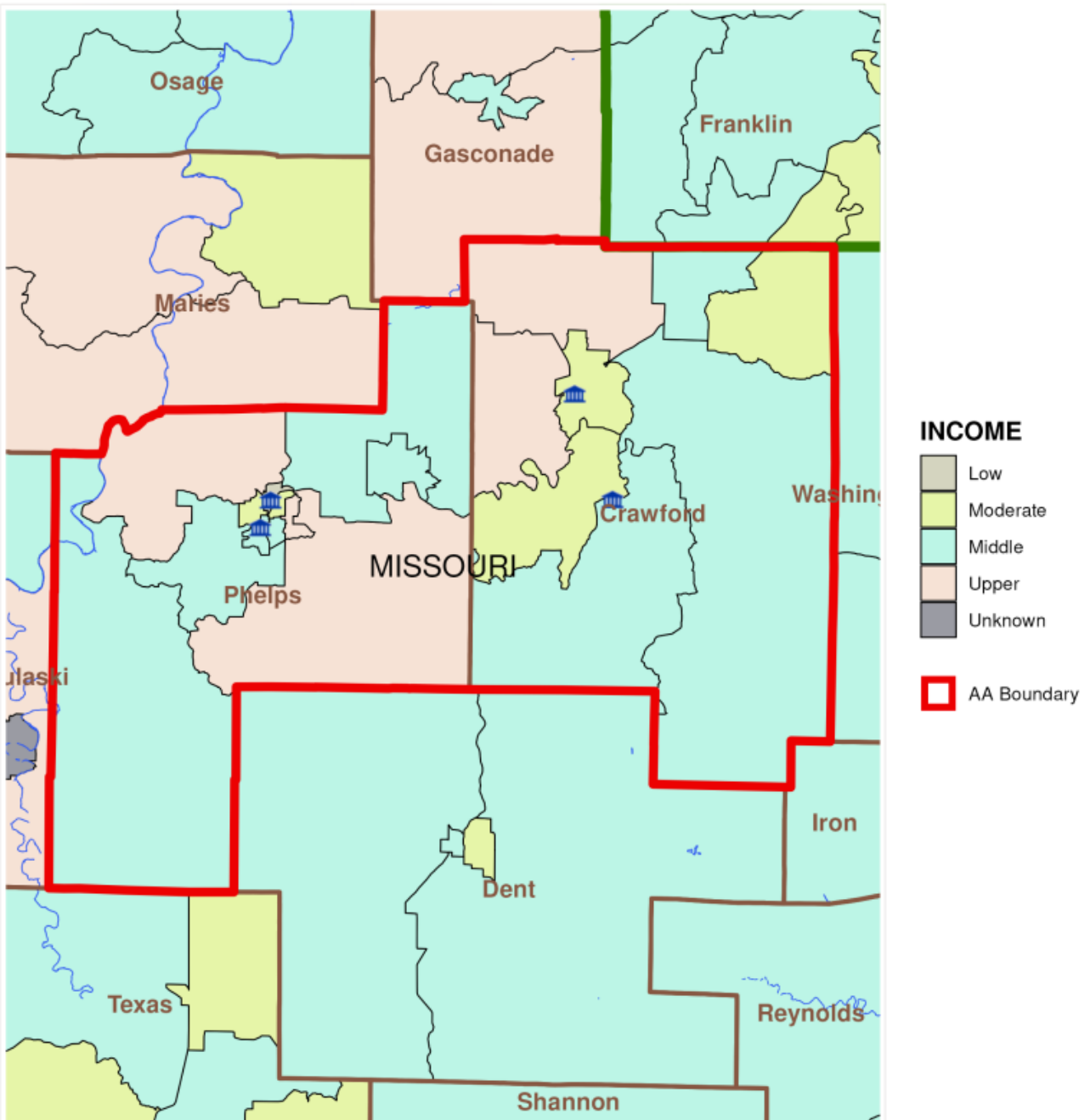
Distribution of 2022–2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	12.5	25.5	104	16.4	22.6	30.9
Middle	5	62.5	38.6	492	77.5	38.9	35.0
Upper	2	25.0	35.8	39	6.1	38.5	34.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
TOTAL	8	100.0	100.0	635	100.0	100.0	100.0
<i>Source: 2022 and 2023 FFIEC Census Data</i> <i>2022 and 2023 Dun & Bradstreet Data</i> <i>2016–2020 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0% due to rounding.</i>							

Distribution of 2022–2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	44.4	21.5	403	41.0	15.4	23.4
Middle	5	55.6	37.9	581	59.0	33.3	47.5
Upper	0	0.0	40.6	0	0.0	51.3	29.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
TOTAL	9	100.0	100.0	984	100.0	100.0	100.0
<i>Source: 2022 and 2023 FFIEC Census Data</i> <i>2016–2020 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0% due to rounding.</i>							

APPENDIX B – MAP OF THE ASSESSMENT AREAS

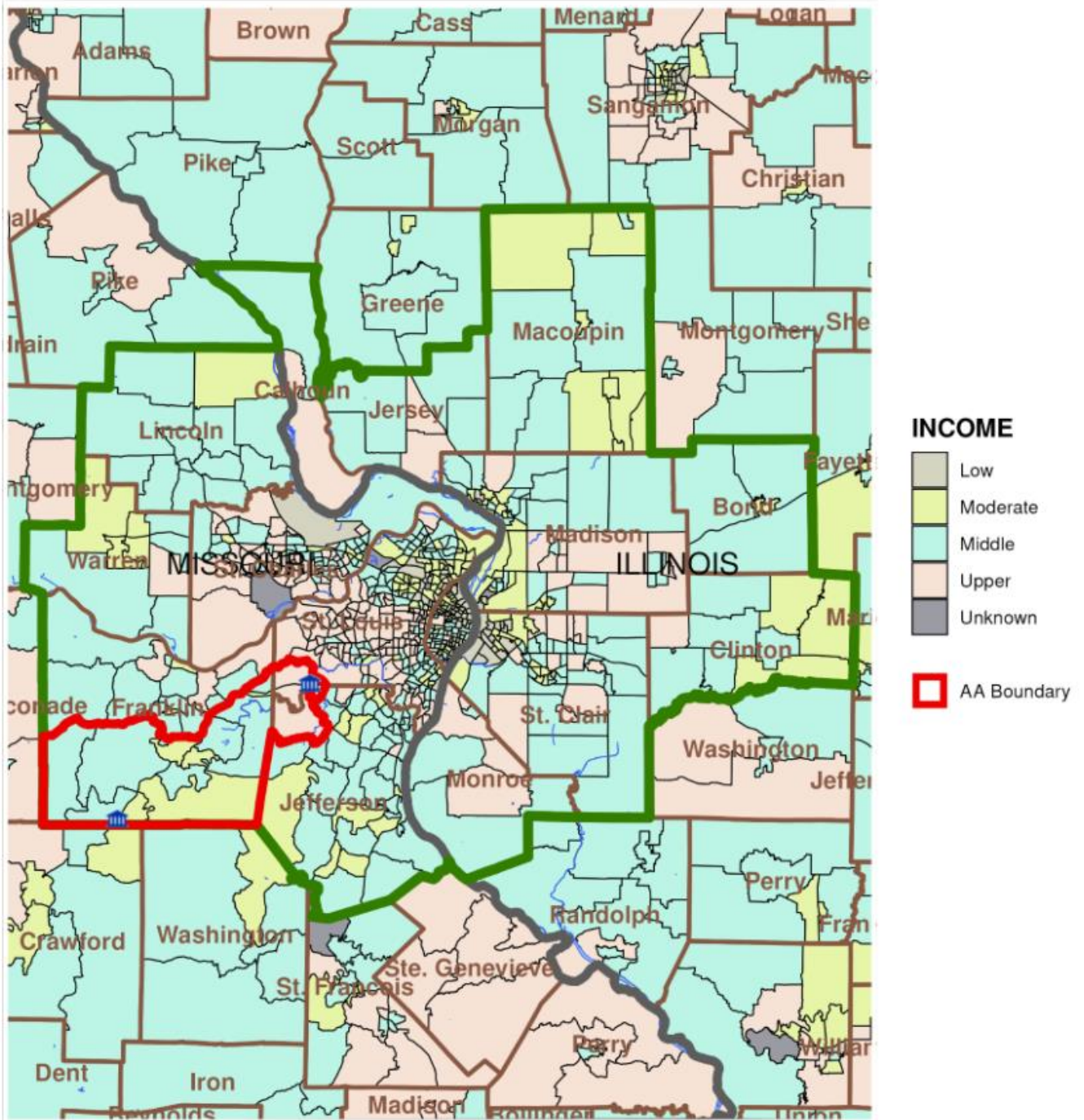
Southeast Missouri Assessment Area

MO NonMSA 2023 - Tract Income



St. Louis Assessment Area

St. Louis, MO partial MSA 2023 - Tract Income



APPENDIX C – GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20

percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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

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

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of

criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

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

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

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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