

PUBLIC DISCLOSURE

October 6, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The Callaway Bank
RSSD #719656**

**5 East Fifth Street
Fulton, Missouri 65251**

Federal Reserve Bank of St. Louis

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

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

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

The Lending Test is rated:

Satisfactory

The Community Development Test is rated:

Outstanding

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

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

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC) Intermediate Small Bank Procedures. The Intermediate Small Bank Examination Procedures entail two performance tests: the Lending Test and the Community Development Test. The bank operates in two contiguous, delineated AAs within the state of Missouri. One AA consists of Callaway County, which is located in the Jefferson City, Missouri metropolitan statistical area (MSA). The second AA consists of Boone County, which is located in the Columbia, Missouri MSA.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each AA completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2025.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	\$ (000s)	%	
Callaway County	3	50.0	259,352	64.3	Full Scope
Boone County	3	50.0	144,006	35.7	Limited Scope
TOTAL¹	6	100.0	403,358	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 Callaway County AA was given primary consideration and evaluated using full-scope examination procedures, as it contains the majority of the bank’s loan and deposit activity.

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

Performance Criterion	Time Period
LTD Ratio	March 31, 2022 – June 30, 2025
Assessment Area Concentration	January 1, 2023 – December 31, 2023
Loan Distribution by Borrower’s Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	January 18, 2022 – October 5, 2025
Community Development Activities	

Lending Test analyses often entail comparisons of bank performance to AA demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, AA demographics are based on 2020 American Community Survey (ACS) data, and certain business demographics are based on 2023 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank’s lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$404.4 million to \$500.7 million as of June 30, 2025.

¹ Note: In this table and others throughout this document, percentages may not total 100 percent due to rounding.

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

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

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

To augment this evaluation, one community contact interview was conducted with a member of the local community in order to ascertain specific credit needs, opportunities, and local market conditions within the Callaway County AA. Information from this interview also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from the community contact interview are included in the *Description of Assessment Area* section applicable to the Callaway County AA.

DESCRIPTION OF INSTITUTION

The bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Callaway Security Banks, Inc., a one-bank holding company. The bank and its holding company are headquartered in Fulton, Missouri. The bank's branch network consists of six offices (including the main office), all of which have full-service automated teller machines (ATMs) on site. In addition to being full-service facilities, five branches have drive-up accessibility. The bank also operates two stand-alone ATMs: one cash-dispensing-only and one full-service. During the review period, the bank closed two branches: one limited-service branch in the Callaway County AA in March 2024 and one full-service branch in the Boone County AA in August 2025. Based on this branch network and other service delivery systems, such as extended banking hours of operation and online banking capabilities, the bank is well positioned to deliver financial services to the entirety of its AAs.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its AAs based on its available resources and financial products. As of June 30, 2025, the bank reported total assets of \$498.8 million. As of the same date, loans and leases outstanding were \$375.1 million (75.2 percent of total assets), and deposits totaled \$403.4 million. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of June 30, 2025		
Credit Category	Amount \$ (000s)	Percentage of Total Loans (%)
1-4 Family Residential	102,855	27.4
Commercial Real Estate	88,414	23.6
Commercial and Industrial	55,883	14.9
Farmland	44,255	11.8
Construction and Development	40,543	10.8
Farm Loans	18,423	4.9
Multifamily Residential	11,444	3.1
Total Other Loans	10,044	2.7
Loans to Individuals	3,199	0.9
TOTAL	375,060	100.0

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

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on January 18, 2022.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 14-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size \$ (000s) as of June 30, 2025	Average LTD Ratio (%)
The Callaway Bank	Fulton, Missouri	498,766	91.0
Regional Banks	Platte City, Missouri	500,693	88.9
	Warrenton, Missouri	470,003	66.6
	Fayette, Missouri	404,367	84.6

Based on data from the previous table, the bank's level of lending is above those of other banks in the region. During the review period, the bank's quarterly LTD ratio was relatively stable, with a low of 82.8 percent in the first quarter of 2022 and a high of 95.3 percent in the fourth quarter of 2023, resulting in a 14-quarter average of 91.0 percent. In comparison, the average LTD ratios for all three of the regional peers were lower, with two peers experiencing steady increases before leveling out near their quarterly average and a third peer's quarterly ratios experiencing more fluctuations across the review period. Therefore, compared to data from regional banks, the bank's average LTD ratio is more than reasonable given the bank's size, financial condition, and credit needs of its AAs.

Assessment Area Concentration

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

Lending Inside and Outside the Assessment Area January 1, 2023 through December 31, 2023								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
HMDA	114	87.7	20,064	83.1	16	12.3	4,073	16.9
Small Business	47	83.9	5,757	82.5	9	16.1	1,219	17.5
TOTAL LOANS	161	86.6	25,821	83.0	25	13.4	5,292	17.0

A majority of loans and other lending-related activities were made in the bank's AAs. As shown in the table above, 86.6 percent of the total loans were made inside the AAs, accounting for 83.0 percent of the dollar volume of total loans.

Borrower and Geographic Distribution

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

Full-Scope Assessment Area	Loan Distribution by Borrower's Profile
Callaway County	Reasonable

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

As displayed in the following table, the bank's overall distribution of lending by income level of census tract reflects excellent penetration throughout the full-scope AA subject to review.

Full-Scope Assessment Area	Geographic Distribution of Loans
Callaway County	Excellent

Limited-Scope Assessment Area	Geographic Distribution of Loans
Boone County	Below

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (January 18, 2022, through October 5, 2025).

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated outstanding. Considering the bank's capacity and the need and availability of such opportunities for community development in the AAs, the bank demonstrates excellent responsiveness to the community development needs of the full-scope AA.

Full-Scope Assessment Area	Community Development Test Performance Conclusions
Callaway County	Excellent

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

During the review period, the bank made 34 qualifying loans in its AAs totaling approximately \$16.9 million. Of those loans, 23 loans, totaling \$12.6 million, were to small businesses for the purpose of economic development, as they created and retained jobs for LMI individuals; 10 loans, totaling \$1.6 million, were for community services; and 1 loan, totaling \$2.7 million, was for affordable housing.

The bank also made community development investments and donations in its AAs totaling \$6.6 million. This amount includes five new qualified investments totaling \$3.4 million and two continuing investments made in a prior review period totaling \$3.1 million. Four of the investments were bonds issued for revitalization and stabilization, and three of the investments were for affordable housing. Furthermore, the 44 donations, totaling \$126.4 thousand, were to 16 separate organizations for the purpose of community services and economic development.

During the review period, 15 bank employees used financial expertise to provide services to 22 different community development organizations within the bank's AAs. Service activities included providing financial expertise to community service organizations as board members and instructing financial education courses at organizations that primarily serve LMI individuals.

Total Community Development Activities Inside Assessment Areas January 18, 2022 – October 5, 2025			
Community Development Component	#		\$
Loans	34		16.9 million
Investments, Current and Prior	7		6.5 million
Current Period	5		3.4 million
Prior Period, Still Outstanding	2		3.1 million
Donations	44		126,358
Services	31 services	3,910 hours	22 organizations

In addition to meeting the community development needs of its AAs, the bank had community development loans and investment outside its AAs but still within the broader statewide or regional areas. The bank made six such community development loans, totaling \$7.1 million, as well as \$2.1 million in investments.

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.

JEFFERSON CITY, MISSOURI METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

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

Bank Structure

The bank operates three of its six offices (50.0 percent) within moderate-income census tracts in this AA. All branches have full-service ATMs and loan officers on site, and two branches offer drive-through services. Since the previous evaluation, the bank has not opened any new branches and has closed one limited-service branch located in a middle-income census tract. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the AA.

General Demographics

The AA comprises Callaway County in its entirety, within the Jefferson City, Missouri MSA (Jefferson City MSA). This is the bank's primary AA and is located just north of Jefferson City in central Missouri. As of the 2020 ACS, the AA population was 44,283. Of the five FDIC-insured depository institutions with a branch presence in this AA, the bank ranked second in deposit market share, encompassing 37.2 percent of the total deposit dollars.

Credit needs in the AA include a mix of consumer and business loan products. A particular credit need mentioned by the community contact was for affordable housing, including smaller, starter homes for LMI residents.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	0	2	9	0	0	11
	0.0%	18.2%	81.8%	0.0%	0.0%	100.0%
Family Population	0	1,972	9,121	0	0	11,093
	0.0%	17.8%	82.2%	0.0%	0.0%	100.0%

As shown above, 18.2 percent of the census tracts in the AA are LMI geographies, and 17.8 percent of the family population resides in the LMI census tracts, with no low-income census tracts in the AA.

Based on 2020 ACS data, the median family income for the AA was \$70,206. At the same time, the median family income for the Jefferson City MSA and the state overall were \$75,505 and \$72,834, respectively. More recently, the FFIEC estimates the 2023 median family income for the MSA to be \$88,800 and the state to be \$71,000. The following table displays population percentages of AA families by income level compared to the Missouri family population as a whole.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	2,158	2,450	2,826	3,659	11,093
	19.5%	22.1%	25.5%	33.0%	100.0%
Jefferson City MSA	6,507	7,315	9,033	14,583	37,438
	17.4%	19.5%	24.1%	39.0%	100.0%
Missouri	317,471	285,869	333,130	614,586	1,551,056
	20.5%	18.4%	21.5%	39.6%	100.0%

As shown in the table above, 41.6 percent of the families within the AA were considered LMI, which is above the LMI family percentage for both the Jefferson City MSA (36.9 percent) and the state of Missouri (38.9 percent). The percentage of families living below the poverty level in the AA (8.4 percent) is in line with the state of Missouri (8.9 percent) while slightly higher than the entire MSA (7.3 percent). Considering these factors, the AA income levels appear to be less affluent than the MSA and the state.

Housing Demographics

Based on the housing values, income levels, and rental costs, housing in the AA appears to be less affordable than in the Jefferson City MSA while more closely aligned to the overall state figures.

Housing Cost Burden (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	72.8	31.4	33.4	58.2	35.8	16.6
Jefferson City MSA	67.3	15.4	30.8	54.5	26.2	13.5
Missouri	74.0	30.3	39.6	58.6	26.5	16.1
<i>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</i>						

According to the table above, a greater percentage of LMI renters are cost burdened in the AA and the state than in the Jefferson City MSA. A greater percentage of LMI homeowners in the AA are cost burdened when compared to LMI homeowners in the MSA. Further, the AA experiences a

higher median rent payment (\$719/month) compared to the MSA (\$685/month). This supports the need for more affordable housing, which was noted by the community contact.

Industry and Employment Demographics

According to U.S. Department of Labor Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages data, there are 14,686 paid employees in the AA (including 3,386 government employees). By percentage of non-government employees, the three largest job categories are manufacturing (21.0 percent), followed by retail trade (11.1 percent) and health care and social assistance (8.8 percent). The following table details BLS unemployment data (not seasonally adjusted) for the AA, Jefferson City MSA, and Missouri.

Unemployment Levels (%)			
Dataset	Time Period (Annual Average)		
	2022	2023	2024
Assessment Area	2.4	2.9	3.3
Jefferson City MSA	2.2	2.7	3.1
Missouri	2.6	3.1	3.7

As shown in the preceding table, the AA unemployment levels were similar to the MSA and the state, with all three reflecting a slight upward trend over the past three years.

Community Contact Information

Information from one community contact, who works in community support and development, was used to help shape the performance context in which the bank's activities in the AA were evaluated. The community contact described the economy as stable overall, noting that there are well-established employers in the area and good job opportunities. Additionally, there has been a large influx of small businesses in the past several years. Further, the community contact mentioned the need for additional affordable housing, especially for starter homes as opposed to custom-built homes. Finally, the community contact indicated that there is a sufficient number of banks in the area to meet the credit needs of the AA, with good community involvement.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CALLAWAY COUNTY ASSESSMENT AREA

LENDING TEST

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

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from both loan categories reviewed, with the bank's HMDA loan distribution by borrower's profile considered reasonable and performance under the small business category considered excellent. As previously mentioned, greater significance is placed on performance in the HMDA loan category given the bank's emphasis on HMDA lending.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$88,800 for the Jefferson City MSA as of 2023). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the AA. Additionally, 2023 aggregate data for the AA is displayed.

Borrower Distribution of HMDA Loans Assessment Area: Callaway County								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	5.6	8.7	173	2.5	4.8	19.5
	Moderate	8	22.2	18.6	884	12.7	15.3	22.1
	Middle	8	22.2	22.7	2,107	30.3	22.9	25.5
	Upper	11	30.6	23.5	2,887	41.5	31.6	33.0
	Unknown	7	19.4	26.6	907	13.0	25.4	0.0
	TOTAL	36	100.0	100.0	6,958	100.0	100.0	100.0
Refinance	Low	3	30.0	10.5	151	20.0	6.3	19.5
	Moderate	3	30.0	27.5	359	47.5	24.9	22.1
	Middle	1	10.0	25.0	50	6.6	28.2	25.5
	Upper	1	10.0	24.0	94	12.4	25.7	33.0
	Unknown	2	20.0	13.0	102	13.5	14.9	0.0
	TOTAL	10	100.0	100.0	756	100.0	100.0	100.0
Home Improvement	Low	0	0.0	16.3	0	0.0	15.1	19.5
	Moderate	0	0.0	26.5	0	0.0	23.8	22.1
	Middle	1	33.3	26.5	31	19.5	25.2	25.5
	Upper	1	33.3	22.4	57	35.8	23.5	33.0
	Unknown	1	33.3	8.2	71	44.7	12.3	0.0
	TOTAL	3	100.0	100.0	159	100.0	100.0	100.0
Multifamily	Low	0	0.0	10.0	0	0.0	3.6	N/A
	Moderate	0	0.0	0.0	0	0.0	0.0	N/A
	Middle	0	0.0	0.0	0	0.0	0.0	N/A
	Upper	0	0.0	30.0	0	0.0	17.3	N/A
	Unknown	0	0.0	60.0	0	0.0	79.1	N/A
	TOTAL	0	0.0	100.0	0	0.0	100.0	N/A
HMDA TOTALS	Low	5	10.2	9.5	324	4.1	5.2	19.5
	Moderate	11	22.4	20.8	1,243	15.8	16.6	22.1
	Middle	10	20.4	23.1	2,188	27.8	22.9	25.5
	Upper	13	26.5	23.5	3,038	38.6	29.8	33.0
	Unknown	10	20.4	23.1	1,080	13.7	25.5	0.0
	TOTAL	49	100.0	100.0	7,873	100.0	100.0	100.0

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (10.2 percent) is below the low-income family population figure (19.5 percent) but similar to the 2023 HMDA aggregate lending level to low-income borrowers (9.5 percent), reflecting reasonable performance. The bank's level of lending to moderate-income borrowers (22.4 percent) is in line

with the moderate-income family population percentage (22.1 percent) and slightly above the HMDA aggregate lending level to moderate-income borrowers (20.8 percent), reflecting reasonable performance. Therefore, considering performance in both income categories, the bank's overall distribution of HMDA loans by borrower's profile is reasonable.

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

Small Business Loans by Revenue and Loan Size Assessment Area: Callaway County								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total
		Bank		Aggregate	Bank		Aggregate	Businesses
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	13	100.0	57.6	1,885	100.0	41.6	92.4
	Over \$1 Million/Unknown	0	0.0	42.4	0	0.0	58.4	7.6
	TOTAL	13	100.0	100.0	1,885	100.0	100.0	100.0
Loan Size	\$100,000 or Less	8	61.5	90.0	242	12.8	31.8	
	\$100,001–\$250,000	4	30.8	5.5	643	34.1	18.4	
	\$250,001–\$1 Million	1	7.7	4.5	1,000	53.1	49.8	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	13	100.0	100.0	1,885	100.0	100.0	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	8	61.5		242	12.8		
	\$100,001–\$250,000	4	30.8		643	34.1		
	\$250,001–\$1 Million	1	7.7		1,000	53.1		
	Over \$1 Million	0	0.0		0	0.0		
	TOTAL	13	100.0		1,885	100.0		

The bank's level of lending to small businesses is excellent. The bank originated all of its small business loans (100.0 percent) to businesses with revenues of \$1 million or less, which exceeds the aggregate lending level of 57.6 percent and the demographic estimate of businesses in the AA with annual revenues of \$1 million or less (92.4 percent).

Geographic Distribution of Loans

As noted previously, the AA includes no low-income and two moderate-income census tracts, representing 18.2 percent of all AA census tracts. Overall, the bank's geographic distribution of loans in this AA reflects excellent penetration throughout these moderate-income census tracts, based on the HMDA and small business loan categories. Furthermore, based on reviews from both loan categories, the bank had loan activity in 80.0 percent of all AA census tracts and 66.7 percent

of LMI geographies, and there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank's overall geographic distribution of loans is excellent.

The following table displays the geographic distribution of 2023 HMDA loans compared to owner-occupied housing demographics and HMDA aggregate lending performance for the AA.

Geographic Distribution of HMDA Loans Assessment Area: Callaway County								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	9	25.0	18.6	1,774	25.5	17.1	13.4
	Middle	27	75.0	81.4	5,184	74.5	82.9	86.6
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	36	100.0	100.0	6,958	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	2	20.0	14.5	119	15.7	13.1	13.4
	Middle	8	80.0	85.5	637	84.3	86.9	86.6
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	10	100.0	100.0	756	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	33.3	8.2	31	19.5	12.0	13.4
	Middle	2	66.7	91.8	128	80.5	88.0	86.6
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	3	100.0	100.0	159	100.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	13.7	61.5
	Middle	0	0.0	80.0	0	0.0	86.3	38.5
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
HMDA TOTALS	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	12	24.5	17.2	1,924	24.4	16.1	13.4
	Middle	37	75.5	82.8	5,949	75.6	83.9	86.6
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	49	100.0	100.0	7,873	100.0	100.0	100.0

The analysis of HMDA loans revealed excellent lending performance to borrowers residing in moderate-income census tracts. The bank's penetration of HMDA lending in moderate-income geographies (24.5 percent) exceeds the demographic (13.4 percent) and the 2023 aggregate lending

levels (17.2 percent). Considering the performance in the moderate-income census tracts, the bank's overall geographic HMDA lending performance is excellent.

Second, the bank's geographic distribution of small business loans was reviewed. The following table displays 2023 small business loan activity by geography income level compared to the location of businesses throughout the bank's AA and small business CRA aggregate lending data.

Geographic Distribution of Small Business Loans Assessment Area: Callaway County							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	38.5	19.0	1,136	60.3	25.8	24.0
Middle	8	61.5	79.5	749	39.7	74.1	76.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	1.5	0	0.0	0.2	0.0
TOTAL	13	100.0	100.0	1,885	100.0	100.0	100.0

The bank's level of lending in moderate-income census tracts (38.5 percent) is well above the aggregate lending percentage (19.0 percent) and the percentage of small businesses in those census tracts (24.0 percent), representing excellent performance. Therefore, the bank's overall geographic distribution of small business loans is excellent.

COMMUNITY DEVELOPMENT TEST

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

During the review period, the bank extended 24 community development loans totaling \$5.3 million in the Callaway County AA. Of these loans, 15 totaling \$3.8 million were made to small businesses for the purpose of economic development. The economic development loans, nine of which were for businesses located in moderate-income census tracts, assisted with start-up costs for small businesses. The bank made nine loans totaling \$1.6 million for the purpose of community services, eight of which were located in moderate-income census tracts. Further, three of the nine loans also qualified as revitalization and stabilization, and another three loans also qualified as affordable housing.

At the time of the evaluation, the bank had a total of approximately \$6.5 million in outstanding investments that qualified for community development credit. This amount included \$3.1 million from prior-period investments that remain in the bank's portfolio, plus \$3.4 million made in the

current review period. Four of the bonds, totaling \$4.0 million, were for construction of a new justice center and expansion of the Callaway County Law Enforcement Center in a moderate-income census tract, with a community development purpose of revitalization and stabilization. In addition to the investments previously noted, the bank made 25 donations totaling approximately \$70,400 to 11 different community organizations benefiting LMI individuals or geographies. Finally, 11 bank employees utilized their financial expertise to provide 3,563 service hours to 16 organizations in this AA.

COLUMBIA, MISSOURI METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

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

This AA comprises the entirety of Boone County located in the Columbia, Missouri MSA. The bank operates three offices in this AA and closed one branch during the review period. The tables below detail key demographics relating to this AA.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	7,492	7,776	8,598	17,278	41,144
	18.2%	18.9%	20.9%	42.0%	100.0%
Household Population	17,493	11,518	12,380	30,528	71,919
	24.3%	16.0%	17.2%	42.5%	100.0%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	4	11	15	9	1	40
	10.0%	27.5%	37.5%	22.5%	2.5%	100.0%
Family Population	962	8,902	17,831	13,085	364	41,144
	2.3%	21.6%	43.3%	31.8%	0.9%	100.0%
Household Population	5,042	19,485	26,698	18,745	1,949	71,919
	7.0%	27.1%	37.1%	26.1%	2.7%	100.0%
Business Institutions	878	1,893	2,544	1,795	192	7,302
	12.0%	25.9%	34.8%	24.6%	2.6%	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOONE COUNTY ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in this AA is consistent with the bank's Lending Test performance in the AA, also located in the state of Missouri, 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

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this AA is consistent with the bank's Community Development Test performance in the AA that was reviewed using full-scope procedures.

During the review period, the bank made ten community development loans totaling \$11.6 million, eight of which were for the purpose of economic development. These loans were made to small businesses that create and retain jobs for LMI individuals. Of the remaining two loans, one was for a community service to assist with donated transportation, and one was for affordable housing in a low-income census tract. The bank also made 19 donations totaling approximately \$56,000, and five members of bank staff provided 347 service hours to seven different organizations in this AA.

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

Boone County Assessment Area

Borrower Distribution of HMDA Loans Assessment Area: Boone County								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	4.0	7.6	157	1.5	4.1	18.2
	Moderate	9	18.0	19.4	1,537	14.8	14.9	18.9
	Middle	10	20.0	19.4	2,512	24.2	18.9	20.9
	Upper	11	22.0	27.7	3,027	29.1	39.3	42.0
	Unknown	18	36.0	25.9	3,153	30.4	22.8	0.0
	TOTAL	50	100.0	100.0	10,386	100.0	100.0	100.0
Refinance	Low	0	0.0	12.4	0	0.0	6.9	18.2
	Moderate	1	25.0	17.5	162	28.9	12.6	18.9
	Middle	0	0.0	24.5	0	0.0	22.2	20.9
	Upper	1	25.0	28.2	219	39.0	37.1	42.0
	Unknown	2	50.0	17.3	180	32.1	21.2	0.0
	TOTAL	4	100.0	100.0	561	100.0	100.0	100.0
Home Improvement	Low	0	0.0	9.5	0	0.0	3.6	18.2
	Moderate	1	50.0	18.0	156	74.6	12.5	18.9
	Middle	1	50.0	25.7	53	25.4	20.1	20.9
	Upper	0	0.0	41.2	0	0.0	58.7	42.0
	Unknown	0	0.0	5.6	0	0.0	5.1	0.0
	TOTAL	2	100.0	100.0	209	100.0	100.0	100.0
Multifamily	Low	0	0.0	2.6	0	0.0	1.3	N/A
	Moderate	0	0.0	2.6	0	0.0	0.3	N/A
	Middle	1	100.0	2.6	396	100.0	0.6	N/A
	Upper	0	0.0	2.6	0	0.0	0.4	N/A
	Unknown	0	0.0	89.7	0	0.0	97.3	N/A
	TOTAL	1	100.0	100.0	396	100.0	100.0	N/A
HMDA TOTALS	Low	2	3.5	8.4	157	1.4	4.2	18.2
	Moderate	11	19.3	18.8	1,855	16.1	13.6	18.9
	Middle	12	21.1	20.4	2,961	25.6	18.0	20.9
	Upper	12	21.1	28.5	3,246	28.1	36.8	42.0
	Unknown	20	35.1	23.8	3,333	28.9	27.5	0.0
	TOTAL	57	100.0	100.0	11,552	100.0	100.0	100.0

Small Business Loans by Revenue and Loan Size Assessment Area: Boone County								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	34	100.0	53.1	3,873	100.0	39.0	92.1
	Over \$1 Million/ Unknown	0	0.0	46.9	0	0.0	61.0	7.9
	TOTAL	34	100.0	100.0	3,873	100.0	100.0	100.0
Loan Size	\$100,000 or Less	22	64.7	90.4	828	21.4	33.7	
	\$100,001– \$250,000	8	23.5	5.2	1,581	40.8	19.1	
	\$250,001– \$1 Million	4	11.8	4.4	1,464	37.8	47.3	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	34	100.0	100.0	3,873	100.0	100.0	
Loan Size	Revenue \$1 Million or Less	22	64.7		828	21.4		
	\$100,001– \$250,000	8	23.5		1,581	40.8		
	\$250,001– \$1 Million	4	11.8		1,464	37.8		
	Over \$1 Million	0	0.0		0	0.0		
	TOTAL	34	100.0		3,873	100.0		

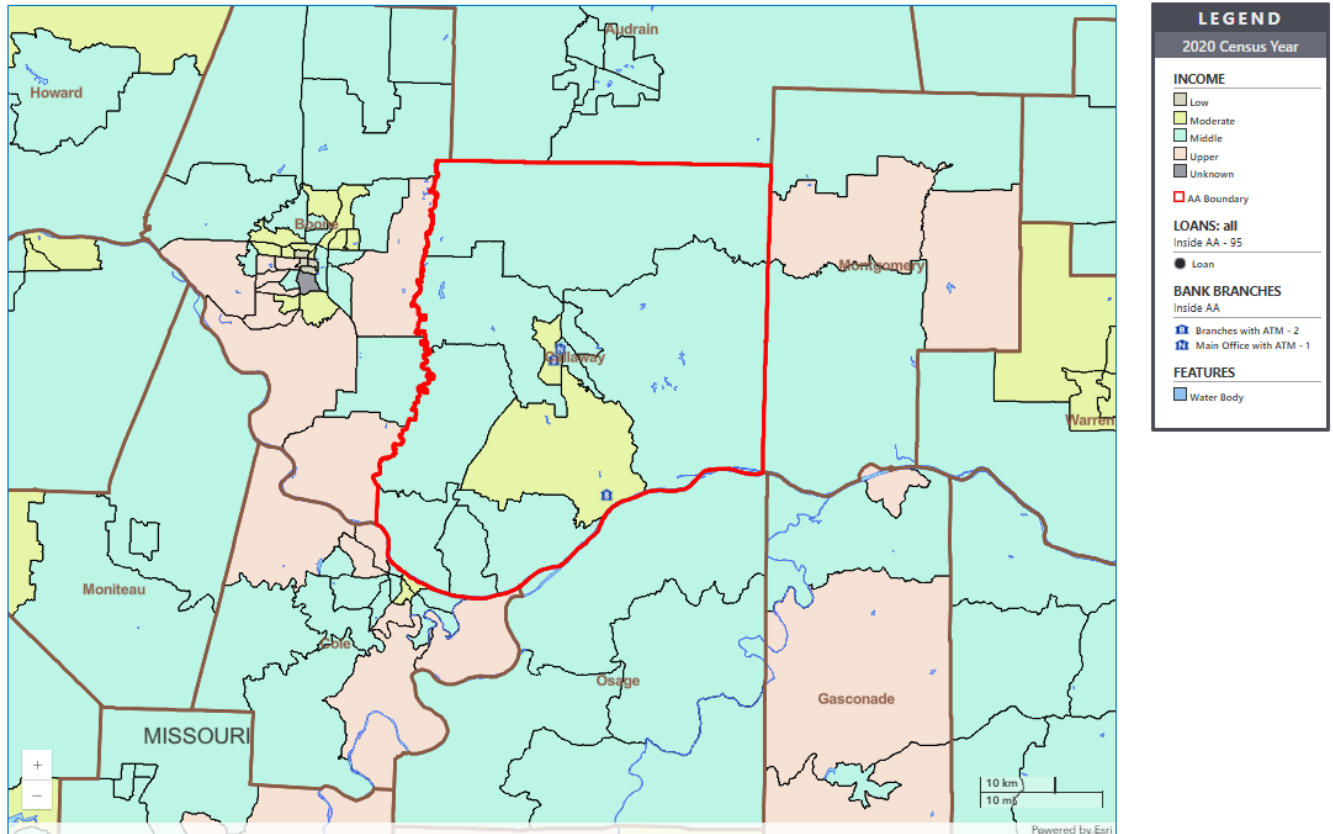
Geographic Distribution of HMDA Loans Assessment Area: Boone County								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner- Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	1	2.0	1.1	73	0.7	0.8	1.1
	Moderate	14	28.0	23.7	2,199	21.2	18.1	19.5
	Middle	20	40.0	43.7	4,273	41.1	39.6	43.6
	Upper	14	28.0	31.2	3,677	35.4	41.2	35.3
	Unknown	1	2.0	0.4	164	1.6	0.3	0.5
	TOTAL	50	100.0	100.0	10,386	100.0	100.0	100.0
Refinance	Low	0	0.0	0.9	0	0.0	1.1	1.1
	Moderate	0	0.0	19.0	0	0.0	13.9	19.5
	Middle	4	100.0	44.1	561	100.0	41.7	43.6
	Upper	0	0.0	35.8	0	0.0	43.3	35.3
	Unknown	0	0.0	0.2	0	0.0	0.1	0.5
	TOTAL	4	100.0	100.0	561	100.0	100.0	100.0
Home Improvement	Low	1	50.0	1.8	53	25.4	1.3	1.1
	Moderate	0	0.0	16.9	0	0.0	17.1	19.5
	Middle	0	0.0	43.7	0	0.0	37.8	43.6
	Upper	1	50.0	37.7	156	74.6	43.8	35.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.5
	TOTAL	2	100.0	100.0	209	100.0	100.0	100.0
Multifamily	Low	1	100.0	10.3	396	100.0	2.3	22.1
	Moderate	0	0.0	38.5	0	0.0	38.3	37.5
	Middle	0	0.0	33.3	0	0.0	33.0	20.1
	Upper	0	0.0	15.4	0	0.0	25.5	11.4
	Unknown	0	0.0	2.6	0	0.0	0.9	8.9
	TOTAL	1	100.0	100.0	396	100.0	100.0	100.0
HMDA TOTALS	Low	3	5.3	1.2	522	4.5	0.9	1.1
	Moderate	14	24.6	22.6	2,199	19.0	19.1	19.5
	Middle	24	42.1	43.6	4,834	41.8	39.3	43.6
	Upper	15	26.3	32.2	3,833	33.2	40.4	35.3
	Unknown	1	1.8	0.3	164	1.4	0.3	0.5
	TOTAL	57	100.0	100.0	11,552	100.0	100.0	100.0

Geographic Distribution of Small Business Loans Assessment Area: Boone County							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	2	5.9	6.5	216	5.6	9.4	12.0
Moderate	7	20.6	25.9	1,415	36.5	28.2	25.9
Middle	16	47.1	32.6	1,235	31.9	31.4	34.8
Upper	8	23.5	32.1	967	25.0	29.2	24.6
Unknown	1	2.9	2.9	40	1.0	1.9	2.6
TOTAL	34	100.0	100.0	3,873	100.0	100.0	100.0

APPENDIX B – MAPS OF ASSESSMENT AREAS

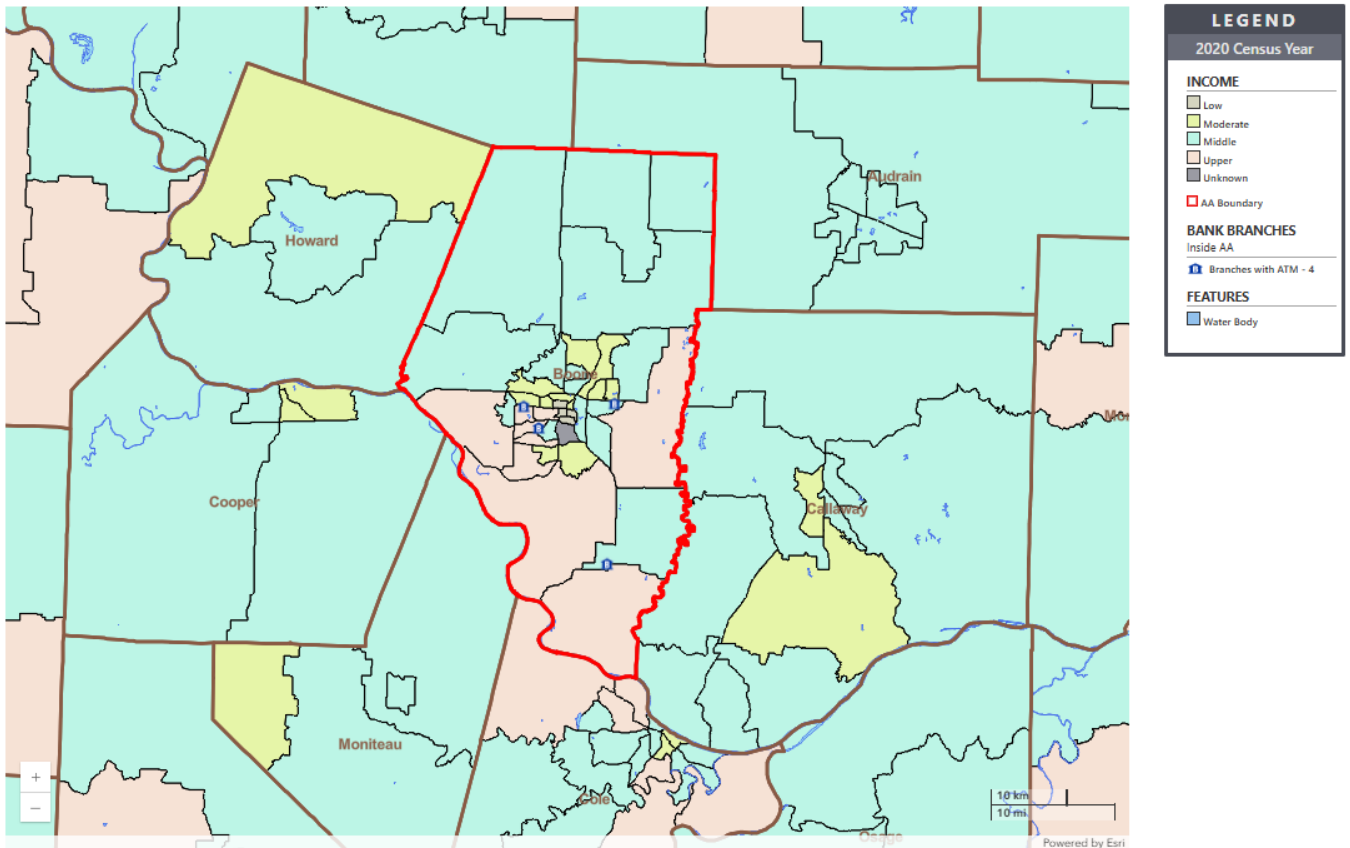
Callaway County Assessment Area

Callaway Bank - Fulton, MO 2025
Callaway County, MO



Boone County Assessment Area

Callaway Bank - Fulton, MO 2025
Boone County, MO



APPENDIX C – GLOSSARY

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

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

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

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

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

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

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

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the

following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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