RiverBank

CRA Public File

Community Reinvestment Act Notice

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination for the next two quarters. This list is available from the Regional Director, Division of Supervision and Consumer Protection (DSC), FDIC San Francisco Regional Office, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco, CA 94105. You may send written comments about our performance in helping to meet community credit needs to Shannon Seesholtz, CRA Officer, 202 E. Spokane Falls Blvd., Suite 400, Spokane, WA 99202, and FDIC Regional Director. You may also submit comments electronically through the FDIC's website at *fdic.gov/regulations/cra*. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of RiverBank Holding Company, a bank holding company. You may request from the Director of Consumer Affairs Examinations, Federal Reserve Bank of San Francisco, PO Box 7702, San Francisco, CA 94120 an announcement of applications covered by the CRA filed by bank holding companies.

1. Public Comments:

RiverBank received no written comments or complaints during the current or the last two years.

April 1, 2026

EQUAL HOUSING LENDER FDIC

RiverBank

2. Branch Office Locations:

Main Office:	202 E Spokane Falls Blvd. Ste 100 Spokane, WA 99202 MSA 44060 State 53 County 63 Census Tract 0145.00 Open Date: May 22, 2006 Hours of Operation: 9 AM to 5 PM Mon-Fri Full Service Branch
Administrative Office:	202 E Spokane Falls Blvd. Ste 100 Spokane, WA 99202 Open Date: May 22, 2006 Hours of Operation: 9 AM to 5 PM Mon-Fri
Mobile Branches	Five mobile locations 202 E Spokane Falls Blvd. Ste 100 Spokane, WA 99202 MSA 44060 State 53 County 63 Census Tract 0145.00 Open Date: November 6, 2006 Hours of Operation: 8 AM to 4:30 PM Mon-Fri All Deposit Services

3. Branch Activity:

RiverBank did not open or close a bank branch in the current year or previous two years.

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4. Products and Services:

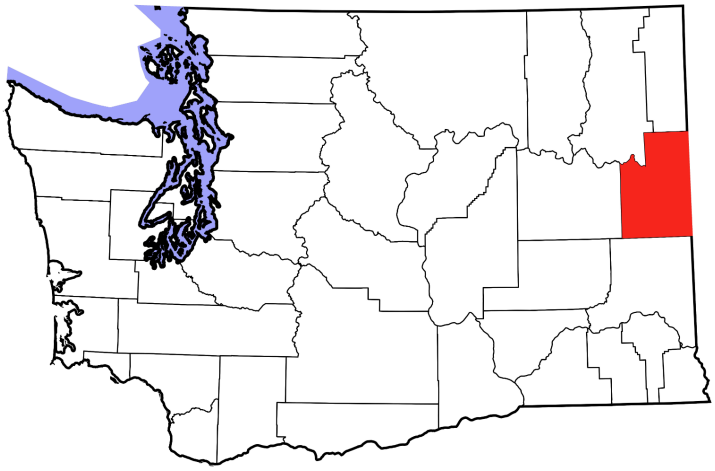
Business Accounts	Checking Accounts IOLTA/IRETA Accounts Savings Accounts Money Market Accounts Certificates of Deposit
Personal Accounts	Checking Accounts Savings Accounts Money Market Accounts Certificates of Deposit IRAs
Lending	Business and Personal Lines of Credit Commercial Loans Real Estate Loans Lines of Credit and Commercial Term Loans Commercial and Residential Construction Loans Agricultural Loans (including USDA Loans) SBA Loans Bridge and Enterprise Loans Home Equity Lines of Credit
Digital Services	Merchant Services ACH Wires Remote Deposit Capture Positive Pay
Digital Banking Features	Mobile App Online Banking Other Account Logins Bill Pay Mobile Check Deposit
Card Services	Personal Credit Card Preferred Points Business Credit Card Standard Business Credit Card Prepaid Solutions Personal and Business Debit Cards
Other Services	Night Drop Mobile Branch Deposit Pick-up IntraFi Network – ICS and CDARS

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5. Communities We Serve:

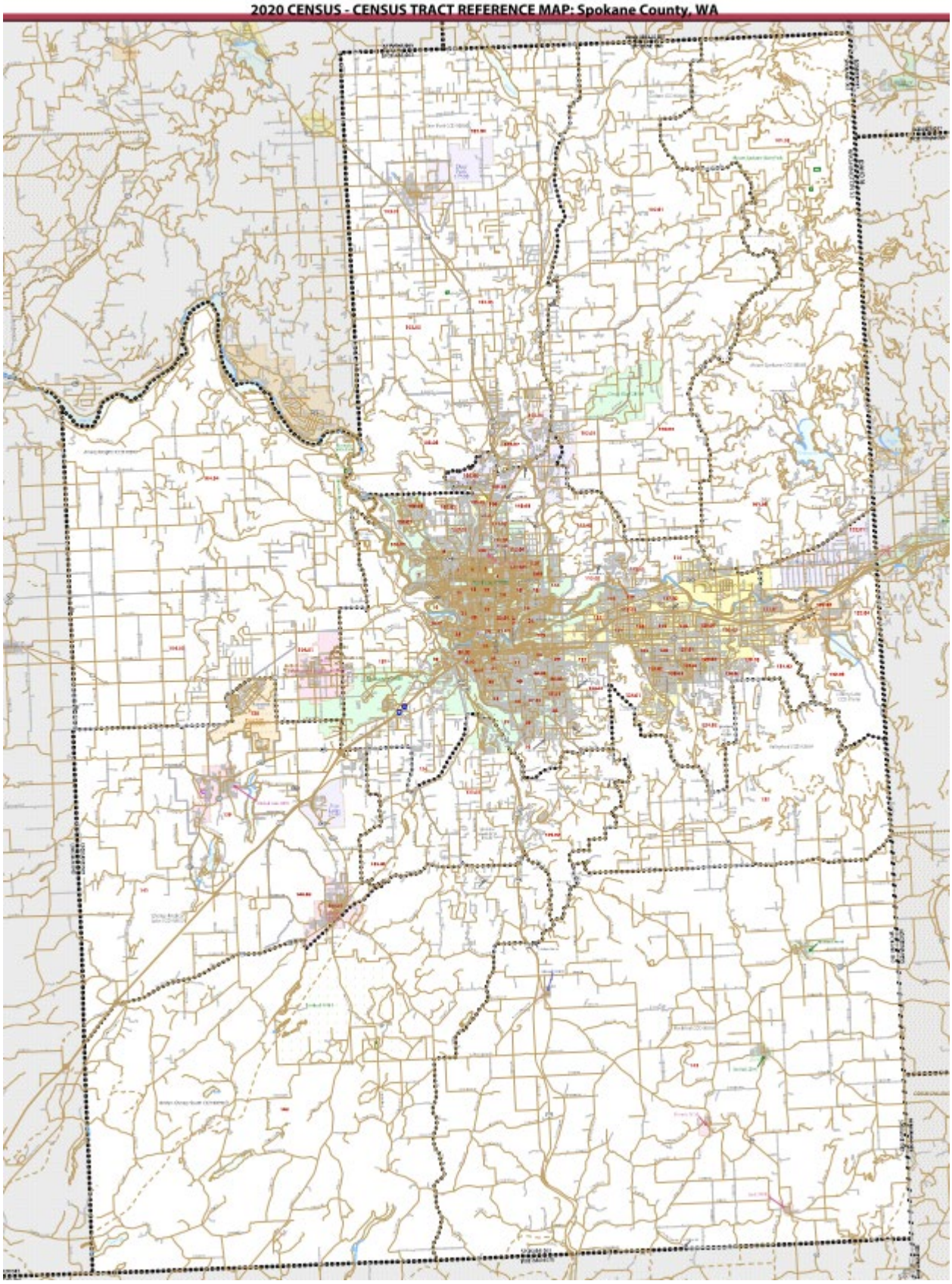
RiverBank's CRA Assessment Area is Spokane County, which includes the cities of Spokane, Spokane Valley, Airway Heights, Millwood, Cheney, and Liberty Lake.



April 1, 2026

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April 1, 2026

EQUAL HOUSING LENDER

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2024 Census Tract Data: Spokane County, Washington

State Code	County Code	Tract Code	Tract Income Level
53	063	0002.01	Low
53	063	0002.02	Moderate
53	063	0003.01	Low
53	063	0003.02	Moderate
53	063	0004.00	Moderate
53	063	0005.00	Moderate
53	063	0006.00	Middle
53	063	0007.00	Middle
53	063	0008.00	Middle
53	063	0009.00	Middle
53	063	0010.00	Middle
53	063	0011.00	Middle
53	063	0012.00	Moderate
53	063	0013.00	Moderate
53	063	0014.00	Moderate
53	063	0015.00	Moderate
53	063	0016.00	Moderate
53	063	0018.00	Middle
53	063	0019.00	Moderate
53	063	0020.00	Low
53	063	0021.00	Middle
53	063	0023.00	Middle
53	063	0024.00	Moderate
53	063	0025.01	Moderate
53	063	0025.02	Moderate

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53	063	0025.03	Unknown
53	063	0026.00	Moderate
53	063	0029.00	Middle
53	063	0030.00	Moderate
53	063	0031.00	Moderate
53	063	0032.00	Moderate
53	063	0035.00	Unknown
53	063	0036.01	Moderate
53	063	0036.02	Moderate
53	063	0038.00	Middle
53	063	0039.00	Middle
53	063	0040.01	Moderate
53	063	0040.02	Moderate
53	063	0041.00	Upper
53	063	0042.00	Upper
53	063	0043.00	Upper
53	063	0044.00	Middle
53	063	0045.00	Upper
53	063	0046.01	Middle
53	063	0046.02	Upper
53	063	0047.01	Middle
53	063	0047.02	Middle
53	063	0048.00	Upper
53	063	0049.00	Upper
53	063	0050.00	Middle
53	063	0101.01	Middle
53	063	0101.02	Upper
53	063	0102.01	Moderate
53	063	0102.03	Upper

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53	063	0102.04	Upper
53	063	0103.01	Middle
53	063	0103.03	Middle
53	063	0103.04	Middle
53	063	0103.05	Upper
53	063	0104.01	Moderate
53	063	0104.03	Upper
53	063	0104.04	Upper
53	063	0105.04	Middle
53	063	0105.05	Upper
53	063	0105.06	Middle
53	063	0105.07	Upper
53	063	0105.08	Upper
53	063	0106.01	Middle
53	063	0106.03	Upper
53	063	0106.04	Upper
53	063	0107.01	Upper
53	063	0107.02	Upper
53	063	0108.00	Middle
53	063	0109.01	Middle
53	063	0109.02	Middle
53	063	0110.00	Middle
53	063	0111.02	Moderate
53	063	0111.03	Moderate
53	063	0111.04	Low
53	063	0112.02	Middle
53	063	0112.03	Moderate
53	063	0112.04	Middle
53	063	0113.01	Upper

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53	063	0113.02	Upper
53	063	0114.00	Middle
53	063	0115.00	Middle
53	063	0116.00	Middle
53	063	0117.01	Middle
53	063	0117.02	Moderate
53	063	0118.00	Moderate
53	063	0119.00	Moderate
53	063	0120.00	Middle
53	063	0121.00	Moderate
53	063	0122.00	Middle
53	063	0123.00	Middle
53	063	0124.01	Upper
53	063	0124.02	Upper
53	063	0125.00	Moderate
53	063	0126.00	Middle
53	063	0127.01	Middle
53	063	0127.02	Middle
53	063	0128.01	Middle
53	063	0128.02	Middle
53	063	0129.01	Middle
53	063	0129.02	Middle
53	063	0130.01	Upper
53	063	0130.02	Moderate
53	063	0130.03	Upper
53	063	0131.01	Middle
53	063	0131.02	Middle
53	063	0132.01	Middle
53	063	0132.03	Middle

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53	063	0132.04	Upper
53	063	0132.05	Upper
53	063	0133.00	Upper
53	063	0134.01	Upper
53	063	0135.01	Upper
53	063	0135.02	Upper
53	063	0135.03	Upper
53	063	0136.00	Middle
53	063	0137.00	Middle
53	063	0138.00	Moderate
53	063	0139.00	Middle
53	063	0140.01	Moderate
53	063	0140.02	Middle
53	063	0141.00	Middle
53	063	0142.00	Upper
53	063	0143.00	Middle
53	063	0144.00	Middle
53	063	0145.00	Moderate

6. Loan to Deposit Ratios:

3/31/2025	6/30/2025	9/30/2025	12/31/2025	Quarterly Average
96.550%	93.630%	94.180%	89.340%	93.425%

EQUAL HOUSING LENDER FDIC

PUBLIC DISCLOSURE

May 30, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

RiverBank
Certificate Number: 58322

202 East Spokane Falls Boulevard, Suite 400
Spokane, Washington 99202

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
San Francisco Regional Office

25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

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 this 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.

TABLE OF CONTENTS

INSTITUTION RATING 1
DESCRIPTION OF INSTITUTION 2
DESCRIPTION OF ASSESSMENT AREA 3
SCOPE OF EVALUATION 5
CONCLUSIONS ON PERFORMANCE CRITERIA 6
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 9
APPENDICES 10
SMALL BANK PERFORMANCE CRITERIA 10
GLOSSARY 11

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The following points summarizes the bank's Lending Test performance.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.

- The institution made a majority of small business and home mortgage loans inside the assessment area.

- The geographic distribution of loans reflects excellent dispersion throughout the assessment area.

- The distribution of borrowers reflects reasonable penetration among business of different sizes given the demographics of the assessment area.

- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

RiverBank (RB) is a commercial bank headquartered in Spokane, Washington. The institution is a wholly-owned subsidiary of RiverBank Holding Company, a one-bank holding company and has no affiliates or subsidiaries. RB did not open or close any branches nor engage in any merger or acquisition activity since the previous CRA evaluation. The institution received a Satisfactory CRA Rating at its previous FDIC Performance Evaluation dated April 10, 2017, using Small Institution Examination Procedures.

RB continues to operate with one full-service branch in Spokane. The institution offers a variety of commercial and real estate loans to small- and medium-sized businesses and credit cards, lines of credit, and bridge loans to consumers. RB also provides deposit services to businesses and consumers, including checking, savings, money market accounts, and certificates of deposit. In addition, alternative banking services include online banking, a mobile app, and a mobile branch, which serves business customers via deposit or payment pick-up, change order delivery, and document delivery or pick-up.

Assets totaled approximately $222.9 million as of March 31, 2023, and included total loans of $183.9 million and total deposits of nearly $193.7 million. The loan portfolio is illustrated in the following table.

Loan Portfolio Distribution as of 3/31/2023		
Loan Category	**$(000s)**	**%**
Construction and Land Development	17,280	13.4
Secured by Farmland	3,265	2.5
1-4 Family Residential	38,512	29.9
Multi-family (5 or more) Residential	21,525	16.7
Commercial Real Estate	76,558	16.6
Total Real Estate Loans	**157,140**	**79.1**
Commercial and Industrial	21,416	16.6
Agricultural	847	0.7
Consumer	570	0.4
Other	4,728	3.7
Less: Unearned Income	(789)	(0.5)
Total Loans	**183,912**	**100.0**
Source: Reports of Income and Condition		

Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREA

RB continues to delineate one assessment area consisting of all 130 census tracts in Spokane County, Washington. Spokane County is one of two counties that comprise the Spokane-Spokane Valley, WA MSA #44060. The assessment area contains whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude any low- or moderate-income geographies.

Economic and Demographic Data

According to the 2020 U.S. Census, the assessment area consists of 4 low-, 35 moderate-, 55 middle-, and 34 upper-income census tracts as well as 2 census tracts without assigned income designations. The following table contains relevant demographic information for the Spokane assessment area.

Demographic Information of the Assessment Area

Assessment Area: Spokane County

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	3.1	26.9	42.3	26.2	1.5
Population by Geography	539,339	2.4	25.8	43.5	27.0	1.3
Housing Units by Geography	219,964	2.7	27.2	43.9	25.2	1.1
Owner-Occupied Units by Geography	130,298	1.9	16.7	48.6	32.7	0.1
Occupied Rental Units by Geography	76,204	3.9	44.2	36.4	13.0	2.5
Vacant Units by Geography	13,462	3.3	31.8	40.7	21.2	2.9
Businesses by Geography	64,266	1.1	24.4	33.6	22.3	18.5
Farms by Geography	1,972	1.0	15.0	43.4	34.6	5.9
Family Distribution by Income Level	129,359	19.3	18.5	21.3	40.9	0.0
Household Distribution by Income Level	206,502	22.9	16.9	18.3	41.9	0.0
Median Family Income MSA - 44060 Spokane-Spokane Valley, WA MSA		$76,280	Median Housing Value			$242,475
			Median Gross Rent			$951
			Families Below Poverty Level			8.0%

Source: 2020 U.S. Census and 2022 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Spokane County is located in the eastern part of the state of Washington bordered by Whitman County to the south, Lincoln and Stevens Counties to the west, Pend Oreille County to the north, and Kootenai, Bonner, and Benewah Counties to the east in Idaho. The city of Spokane is both the largest city and county seat of Spokane County. As part of the larger MSA, Moody's details how the primary economic drivers in the county consist of the defense, logistics, and college industries. Furthermore, positive net migration flows, a low cost of doing business, and stability in the healthcare industry and local student population have resulted in a growing local economy.

However, the following table details how employment in the area presents challenges, with the average unemployment rate for Spokane County exceeding both the state and national rates in each of the most recent three years.

Unemployment Rates			
Area	**2020**	**2021**	**2022**
	%	**%**	**%**
Spokane County	8.6	5.5	4.8
Washington	8.5	5.2	4.2
National Average	8.1	5.3	3.6
Source: Bureau of Labor Statistics			

Competition

RB operates with a high level of competition among other financial institutions. According to FDIC Deposit Market Share data as of June 30, 2022, the institution ranks 10th out of 16 total institutions with a 1.7 percent market share. The top nine institutions in the market hold a combined 93.9 percent market share and are all large, multi-billion dollar regional or national institutions.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit needs of the community. This information helps examiners determine what credit opportunities are potentially available and whether local financial institutions are responsive to those needs.

Examiners conducted two community contacts with organizations located in Spokane County: one economic development organization and one affordable housing organization. The contacts stated that while the local economy has seen growth in recent years, growth is minimal in the city of Spokane and more concentrated in the surrounding areas. Furthermore, the contact explained that financial institutions, businesses, and consumers have struggled in taking on debt at current rates that makes sense financially for all parties involved. However, businesses still seek operating capital and credit for fixtures. One contact also detailed how housing affordability has been declining even though zoning has allowed for denser housing.

Credit Needs

Based on information obtained from bank management, demographic and economic data, and the community contacts, affordable housing and small business credit are the primary credit needs in the assessment area.

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the previous Performance Evaluation dated April 10, 2017, to the current evaluation dated May 30, 2023. Examiners used the Interagency Small Institution Examination Procedures to evaluate the CRA performance of RB. Examiners relied upon the institution's records and reports, publicly available financial and loan information, demographic data, and community contact interviews.

Activities Reviewed

Small business and home mortgage loans represent RB's major product lines based on the institution's business strategy, loan portfolio composition, and the number and dollar volume of loans originated during the evaluation period. No other loan types, such as small farm loans or consumer loans, represented a major product line; therefore, they provided no material support for conclusions and are not presented in this evaluation.

RB does not report HMDA or small business data; therefore, examiners reviewed samples of the most recent full calendar year of residential mortgage loans and small business loans originated or renewed in 2022 as detailed in bank records. The following table provides a summary of the products reviewed.

Loan Products Reviewed				
Loan Category	**Universe**		**Reviewed**	
	#	**$(000s)**	**#**	**$(000s)**
Small Business	86	22,302	41	9,719
Home Mortgage	25	13,158	25	13,158
Source: Bank Data				

Due to the institution's primary focus on commercial lending and its loan portfolio composition, small business lending performance provided more weight in determining overall conclusions than home mortgage lending. Furthermore, home mortgage lending consisted of business purpose loans. RB relied on business revenues and did not consider or collect borrower income information for home mortgage loans. Therefore, the evaluation did not consider home mortgage loans under the Borrower Profile criterion.

Examiners used 2022 D&B business demographic data as the primary standard of comparison for the bank's small business lending performance and 2020 U.S. Census data for the bank's home mortgage lending performance. The analyses do not include direct comparisons to aggregate data since RB did not report its HMDA or small business data. While the evaluation presents the number and dollar volume of loans, examiners focused on performance by number of loans under the Geographic Distribution and Borrower Profile sections because the number of loans is a better indicator of the number of individuals and businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

RB demonstrated reasonable performance under the Lending Test. This conclusion is primarily supported by the institution's performance under the Geographic Distribution and Borrower Profile criteria.

Loan-to-Deposit Ratio

The average net LTD ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. RB's net LTD ratio, calculated from Call Report data, averaged 86.9 percent over the 24 calendar quarters from June 30, 2017, to March 31, 2023. The ratio ranged from a high of 98.8 percent as of December 31, 2017, to a low of 67.1 percent as of September 30, 2022. When compared to the only institution of similar asset size and portfolio mix in the area, RB performed favorably. In addition, RB and the similarly-situated institution trended similarly with higher net LTD ratios at the beginning of the review period and lower net LTD ratios in recent quarters due to deposit growth outpacing loan growth. This trend indicates that RB and the similarly-situated institution accepted deposits and made loans comparably throughout the review period.

LTD Ratio Comparison		
Bank	**Total Assets as of 3/31/2023 ($000s)**	**Average Net LTD Ratio (%)**
RiverBank	**222,910**	**86.9**
Similarly-Situated Institution	215,859	78.3
Source: Reports of Condition and Income 6/30/2017 – 3/31/2023		

Assessment Area Concentration

Overall, RB originated a majority of the sampled loans in its assessment area. More specifically, the institution originated a majority of the sampled 2022 small business loans by number and dollar in its assessment area. Additionally, the institution originated a substantial majority by number and a majority by dollar of the sampled 2022 home mortgage loans in its assessment area. The following table details this performance.

Lending Inside and Outside of the Assessment Area										
Loan Category	**Number of Loans**				**Total**	**Dollar Amount of Loans $(000s)**				**Total**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**	**#**	**$**	**%**	**$**	**%**	**$(000s)**
Small Business	34	82.9	7	17.1	41	7,441	76.6	2,277	23.4	9,718
Home Mortgage	23	92.0	2	8.0	25	9,784	74.4	3,375	25.6	13,159
Source: Bank Data *Due to rounding, totals may not equal 100.0%*										

Geographic Distribution

The geographic distribution of sampled loans reflects excellent dispersion throughout the assessment area. This conclusion is supported by a distribution of small business and home mortgage loans that reflects excellent penetration throughout the assessment area.

Small Business Loans

The geographic distribution of sampled small business loans reflects excellent dispersion throughout the assessment area as detailed in the table below. In 2022, the distribution of small business loans greatly exceeded the percentage of businesses in moderate-income geographies by both number and dollar volume. Although the institution did not originate any loans in low-income geographies, the presence of only 1.1 percent of businesses indicates extremely limited lending opportunities in those areas. Therefore, RB's performance in moderate-income geographies primarily drives this conclusion.

Geographic Distribution of Small Business Loans

Assessment Area: Spokane County

Tract Income Level	% of Businesses	#	%	$(000s)	%
Low					
2022	1.1	0	0.0	0	0.0
Moderate					
2022	24.4	16	47.1	4,195	56.4
Middle					
2022	33.6	10	29.4	1,766	23.7
Upper					
2022	22.3	5	14.7	630	8.5
Not Available					
2022	18.5	3	8.8	850	11.4
Totals					
2022	**100.0**	**34**	**100.0**	**7,441**	**100.0**

Source: 2022 D&B Data; Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The geographic distribution of sampled home mortgage loans reflects excellent dispersion throughout the AA as detailed in the following table. In 2022, the distribution of home mortgage loans greatly exceeded the percentage of owner-occupied housing units in moderate-income geographies by both number and dollar volume. Although the bank did not originate any home mortgage loans in low-income geographies, the presence of only 1.9 percent of businesses indicates

extremely limited lending opportunities in those areas. Therefore, RB's performance in moderate-income geographies primarily drives this conclusion.

Geographic Distribution of Home Mortgage Loans Assessment Area: Spokane County					
Tract Income Level	**% of Owner-Occupied Housing Units**	**#**	**%**	**$(000s)**	**%**
Low					
2022	1.9	0	0.0	0	0.0
Moderate					
2022	16.7	8	34.8	4,188	42.8
Middle					
2022	48.6	9	39.1	3,455	35.3
Upper					
2022	32.7	6	26.1	2,141	21.9
Not Available					
2022	0.1	0	0.0	0	0.0
Totals					
2022	**100.0**	**23**	**100.0**	**9,784**	**100.0**
Source: 2020 U.S. Census; Bank Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*					

Borrower Profile

The distribution of small business borrowers reflects reasonable penetration among businesses of different sizes given the demographics of the assessment area.

Small Business Loans

The distribution of sampled small business loans reflects reasonable penetration among businesses of different revenue sizes. RB's lending performance to small businesses with revenues of $1 million or less trailed demographic data. However, the percentage of businesses in the assessment area that reported revenues of $1 million or less includes all small businesses, not just those businesses seeking traditional commercial financing. Therefore, actual small business lending opportunities also fall below the percentage of businesses. Bank management further noted how cautious smaller businesses have been in taking on additional debt coming out of the pandemic environment of recent years. In light of these factors and high competition, RB's performance reflects reasonable penetration with a majority of its small business loans to businesses with gross annual revenues less than or equal to $1 million.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Spokane County					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000					
2022	91.2	19	55.9	3,544	47.6
>$1,000,000					
2022	2.6	15	44.1	3,897	52.4
Revenue Not Available					
2022	6.2	0	0.0	0	0.0
Totals					
2022	**100.0**	**34**	**100.0**	**7,441**	**100.0**
Source: 2022 D&B Data; Bank Data; "--" data not available. *Due to rounding, totals may not equal 100.0%*					

Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this component was not considered in determining the bank's overall CRA Rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA Rating.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
3) The geographic distribution of the bank's loans;
4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

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.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.
Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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 Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 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.

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.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.