



## **PUBLIC DISCLOSURE**

April 18, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Bradford National Bank of Greenville  
Charter Number 9734

100 East College Avenue  
Greenville, IL 62246

Office of the Comptroller of the Currency  
500 N. Broadway, Suite 1700  
Saint Louis, MO 63102

**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, and should not 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.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**

**The Lending Test is rated: Outstanding**

The Lending Test rating is based on The Bradford National Bank of Greenville's (BNB or bank) performance in the state of Illinois. The major factors that support this rating include:

- BNB's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its assessment area (AA).
- The bank has an excellent distribution of loans to individuals of different income levels and businesses of different sizes throughout its AA.
- The bank has an excellent distribution of loans across geographies of different income levels throughout its AA.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, BNB's loan-to-deposit ratio is reasonable. The average LTD ratio over the sixteen quarters since the last CRA evaluation is 50.9 percent. Over this period, the LTD ratio ranged from a low of 45.3 percent to a high of 58 percent.

To assess the bank's performance, we analyzed the LTD ratio of comparable institutions. We used a peer group of four institutions of comparable asset size, location, and lending opportunity. Over the evaluation period, the average LTD ratio for the comparable institutions was 70.8 percent. BNB ranked third out of five when comparing average LTD. See table below for further detail.

Institution	Average Quarterly LTD Ratio	Total Assets (\$000s) as of December 31, 2021
Collinsville B & LA	98.3%	\$136,450
FCB Banks	88.2%	\$2,026,686
<b>The Bradford National Bank of Greenville</b>	<b>50.9%</b>	<b>\$494,320</b>
State Bank of St. Jacob	48.8%	\$86,689
Guardian Savings Bank	48.1%	\$35,851
<i>Source: Quarterly Call Reports from January 1, 2018 to December 31, 2021</i>		

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 71.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	652	71.6	259	28.4	911	104,062	68.9	47,068	31.1	151,130
Small Business	14	70.0	6	30.0	20	1,136	53.6	982	46.4	2,118
<b>Total</b>	<b>666</b>	<b>71.5</b>	<b>265</b>	<b>28.5</b>	<b>931</b>	<b>105,198</b>	<b>68.2</b>	<b>48,050</b>	<b>31.2</b>	<b>154,229</b>

Source: Evaluation Period 1/1/2019 – 12/31/2021 Bank Data  
Due to rounding, totals may not equal 100.0%

## Description of Institution

BNB is an intrastate financial institution headquartered in Greenville, Illinois. The bank operates as a wholly owned subsidiary of Bradford Bancorp, Inc., also located in Greenville. As of December 31, 2021, holding company assets totaled approximately \$67.6 million. There were no affiliate or subsidiary activities considered in this evaluation.

BNB operates three full-service branches in addition to the main bank location, and five cash-dispensing proprietary automated teller machines (ATM). All locations offer a wide range of banking products to its customers. This includes traditional deposit products (checking, savings, money market, and certificates of deposit), individual retirement accounts (IRA), and health savings accounts (HSA). Lending products include agriculture, commercial, consumer, and home mortgage loans. The bank offers Rural Development Loans and offers assistance in the form of the Downpayment Plus program, through the Federal Home Loan Bank (FHLB) of Chicago for income-eligible homebuyers. The bank's services also include debit-check cards, internet and mobile banking (both include bill pay), overdraft protection, remote deposit capture, and telephone banking. Since the last evaluation the bank has not opened or closed any branches and there have been no major changes in the bank's corporate structure, including merger or acquisition activities.

As of December 31, 2021, the bank had total assets of \$494 million, total deposits of \$350 million, and common equity tier 1 capital of \$53 million or 15.7 percent of total risk-weighted assets. The bank's total loans were \$176 million or 35.6 percent of total assets. Loan portfolio composition includes the following:

<b>Loan Type</b>	<b>Dollars \$(000s)</b>	<b>Percentage of Loan Portfolio</b>
Commercial Loans	\$18,480	10.5%
Residential Loans	\$138,821	79.1%
Agricultural Loans	\$7,865	4.5%
Consumer Loans	\$9,383	5.3%
Other Loans	\$970	0.5%
<b>Total Loans</b>	<b>\$175,519</b>	<b>100%</b>

Source: 12/31/2021 FFIEC Call Report

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA. BNBs last CRA performance evaluation was on April 29, 2019. Utilizing Small Bank CRA examination procedures, the OCC concluded that BNBs performance was "Outstanding."

For CRA purposes, the bank has identified one AA that includes portions of the St. Louis, MO-IL Metropolitan Statistical Area (MSA) #41180. The AA conforms to regulatory requirements and does not arbitrarily exclude any low- and moderate-income geographies.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of the bank under the Small Bank performance criteria, which consists of the Lending Test. This test evaluates the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period for the Lending Test is January 1, 2019 through December 31, 2021.

Based on our review of all loans originated and purchased during the evaluation period, we determined the bank's primary loan products to be home mortgage loans and business loans. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

<b>Loan Originations/Purchases by Loan Type from January 1, 2019 to December 31, 2021</b>				
<b>Loan Category</b>	<b>Number of Loans</b>	<b>% of Number of Loans</b>	<b>Dollars \$(000s)</b>	<b>% of Dollars</b>
Home Mortgage Loans	1,010	34.0%	\$138,245,905	56.0%
Business Loans	722	24.0%	\$77,859,654	31.0%
Consumer Loans	835	28.0%	\$15,169,361	6.0%
Farm Loans	427	14.0%	\$17,075,454	7.0%
<b>Total</b>	<b>2,994</b>	<b>100%</b>	<b>\$248,350,374</b>	<b>100%</b>
<i>Source: Bank Records January 1, 2019- December 31, 2021</i>				
<i>Due to rounding, totals may not equal 100%</i>				

Examiners relied on Home Mortgage Disclosure Act (HMDA) data to complete an analysis of home mortgage loans. We compared home mortgage loans originated or purchased during the evaluation period to 2015 American Community Survey (ACS) U.S. Census and 2020 CRA aggregate peer data.

In February 2022, we tested the accuracy of the bank's HMDA data as reported on the Loan Application Register. We concluded that BNB's HMDA data is reliable as a source for analysis and conclusions set forth in this CRA performance evaluation.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## Ratings

BNB's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's performance under the CRA Small Bank Lending Test as well as related performance context information from the bank's AA. Except for the bank's LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary products of home mortgage loans and business loans.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Illinois

#### CRA rating for the State of Illinois: Outstanding

#### The Lending Test is rated: Outstanding

The major factors that support this rating include:

- BNB's LTD is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its AA.
- The bank has an excellent distribution of loans to individuals of different income levels and businesses of different sizes throughout its AA.
- The bank has an excellent distribution of loans across geographies of different income levels throughout its AA.

### Description of Institution's Operations in Illinois

BNB's operations in the state of Illinois are located within its St. Louis MO-IL MSA. The AA includes all of Bond County (CTs 9512-9515) and the eastern portion of Madison County (CTs 4036.01, 4036.03-4036.04, 4037.01-4037.02, and 4038.02). The bank operates four branches and six cash-dispensing ATMs in the AA. Two branches, including the main office, are in Greenville. The bank operates one branch in each of the following towns: Highland and Marine. The AA includes 10 CTs, of which none are designated as low income, one is designated as moderate income, six are designated as middle income, and three are designated as upper income.

#### Competition

Competition for deposits in the AA is high. As of June 30, 2021, the bank reported \$327.6 million in deposits in the AA representing 100 percent of the bank's total deposits as of that date. According to the FDIC market share information, the bank ranked seventh in deposit market share in the AA at 4.7 percent. The AA has a total of 27 deposit-taking institutions operating 90 branches. Competitors in the AA include many local community banks and credit unions, numerous regional banks, and three large national banks (U.S. Bank, Bank of America, and PNC Bank). The top three institutions in deposit market share (Busey Bank, FCB Banks, and First Mid Bank & Trust, NA) make up nearly 45 percent of the overall market share.

Market competition for home mortgage loans is high within the AA. According to the 2020 Peer Mortgage Market Share Data, the bank competed with 178 other lenders ranking first. The bank has 10.9 percent of the market share based on number of mortgage loans and 10.2 percent of market share based on dollar volume of loans. Based on the number of mortgage loans, FCB Banks and Busey Bank are the next two top lenders at 8.1 percent, and 4.4 percent of market share respectively.

Demographics

The following table provides a summary of the demographics, including housing and family information, for the St. Louis MSA AA.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Bradford NB MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	10	0.0	10.0	60.0	30.0	0.0
Population by Geography	45,596	0.0	14.9	54.1	31.0	0.0
Housing Units by Geography	18,515	0.0	12.7	58.3	29.0	0.0
Owner-Occupied Units by Geography	13,164	0.0	8.7	57.1	34.1	0.0
Occupied Rental Units by Geography	3,664	0.0	22.6	62.8	14.6	0.0
Vacant Units by Geography	1,687	0.0	22.1	58.3	19.6	0.0
Businesses by Geography	2,921	0.0	13.9	54.4	31.8	0.0
Farms by Geography	369	0.0	2.4	62.1	35.5	0.0
Family Distribution by Income Level	12,198	16.5	18.2	21.3	44.0	0.0
Household Distribution by Income Level	16,828	21.0	16.1	16.7	46.2	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$149,371
			Median Gross Rent			\$690
			Families Below Poverty Level			6.4%

*Source: 2015 ACS and 2021 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.

Family Distribution by Income Level

According to the 2015 ACS Census data, there were 12,198 families in the bank's AA. Approximately 2,016 (16.5 percent) of those families were low-income families, 2,220 (18.2 percent) were moderate-income families, 2,595 (21.3 percent) were middle-income families, and 5,367 (44.0 percent) were upper-income families. The percentage of families living below the poverty level was 6.4 percent.

Housing Characteristics and Home Affordability

The 2015 ACS Census data reported 18,515 total housing units in the banks AA. Of these housing units, 13,164 (71.1 percent) were owner-occupied, 3,664 (19.8 percent) were occupied rental units, and 1,687 (9.1 percent) were vacant. The median age of housing stock is 43 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals. The median housing value for the AA was \$149,361 in 2020.

Based on information in the table below, low-income families earned less than \$40,600 (2019) and up to \$42,350 (2021), and moderate-income families earned from \$40,600 (2019) up to \$67,760 (2021).

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>St. Louis, MO-IL MSA Median Family Income (41180)</b>				
2019 (\$81,200)	<\$40,600	\$40,600 to <\$64,960	\$64,960 to <\$97,440	≥\$97,440
2020 (\$82,600)	<\$41,300	\$41,300 to <\$66,080	\$66,080 to <\$99,120	≥\$99,120
2021 (\$84,700)	<\$42,350	\$42,350 to <\$67,760	\$67,760 to <\$101,640	≥\$101,640
<i>Source: FFIEC</i>				

### Employment Factors and Economic Conditions

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate for this area saw a significant increase in 2020, likely as a result of the COVID-19 pandemic. In 2021, unemployment rates in both Bond and Madison counties decreased and are below the state of Illinois and national annual unemployment rates.

<b>Annual Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Bond County	3.7	6.8	4.5
Madison County	3.0	6.0	3.3
State of Illinois	4.0	9.2	6.1
National	3.7	8.1	5.4
<i>Source: US Department of Labor; Bureau of Labor Statistic. Rates are not seasonally adjusted.</i>			

### Community Contacts

We contacted a community development agency during this evaluation. Our contact identified affordable housing, rental assistance, and assistance to re-house families as the primary needs in the local community.

## **Scope of Evaluation in Illinois**

We performed a full-scope review of the bank's only AA. Refer to Appendix A for more information.

## **LENDING TEST**

The bank's performance under the Lending Test in Illinois is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the state of Illinois is excellent.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the state of Illinois.

### ***Home Mortgage Loans***

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The percentage of home loans originated or purchased in moderate-income geographies far exceeds the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to business loans.

The geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in moderate-income geographies far exceed the percentage of businesses located in moderate-income geographies and aggregate percentage of all reporting lenders.

### ***Lending Gap Analysis***

We reviewed summary reports and maps and analyzed BNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels in the AA is reasonable. The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of low-income families in the AA, but higher than the aggregate percentage of all reporting lenders. The percentage of home loan mortgages originated or purchased to moderate-income borrowers was in line with the percentage of moderate-income families and higher than the aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of BNB's loans to small businesses is excellent. The bank originated 95 percent of its business loans to small businesses. This significantly exceeds the percentage of small businesses (84.2 percent) in the AA and the CRA aggregate data for business lending to small businesses in the same AA (47.8 percent).

### **Responses to Complaints**

The bank did not receive any CRA related complaints during the evaluation period.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage loans and small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not applicable	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Illinois</b>		
St. Louis-IL MSA	Full-scope	All of Bond County - CTs 9512-9515 and the Eastern portion of Madison county - 4306.01, 4036.03, 4036.04, 4037.01, 4307.02, and 4038.02.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS      The Bradford National Bank of Greenville	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
The Bradford National Bank of Greenville	Outstanding
<b>State:</b>	
Illinois	Outstanding

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

**Full-Scope Review:** Performance 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 that conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance 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:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 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.

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

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

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** 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, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
St. Louis MO-IL MSA	652	104,062	100.0	2,610	0.0	0.0	0.0	8.7	23.2	6.5	57.1	54.4	48.0	34.1	22.4	45.5	0.0	0.0	0.0		
<b>Total</b>	<b>652</b>	<b>104,062</b>	<b>100.0</b>	<b>2,610</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.7</b>	<b>23.2</b>	<b>6.5</b>	<b>57.1</b>	<b>54.4</b>	<b>48.0</b>	<b>34.1</b>	<b>22.4</b>	<b>45.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
St. Louis MO-IL MSA	652	104,062	100.0	2,610	16.5	9.8	6.8	18.2	18.3	15.6	21.3	25.0	21.2	44.0	39.7	38.6	0.0	7.2	17.9		
<b>Total</b>	<b>652</b>	<b>104,062</b>	<b>100.0</b>	<b>2,610</b>	<b>16.5</b>	<b>9.8</b>	<b>6.8</b>	<b>18.2</b>	<b>18.3</b>	<b>15.6</b>	<b>21.3</b>	<b>25.0</b>	<b>21.2</b>	<b>44.0</b>	<b>39.7</b>	<b>38.6</b>	<b>0.0</b>	<b>7.2</b>	<b>17.9</b>		

*Source: 2015 ACS Census ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2019-21</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$ (00)</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
St. Louis MO-IL MSA	20	3,295	100	848	0	0	0.0	13.9	58.4	4.7	54.4	40.1	57.2	31.8	1.5	38.1	0.0	0	0.0	
<b>Total</b>	<b>20</b>	<b>3,295</b>	<b>100</b>	<b>848</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>13.9</b>	<b>58.4</b>	<b>4.7</b>	<b>54.4</b>	<b>40.1</b>	<b>57.2</b>	<b>31.8</b>	<b>1.5</b>	<b>38.1</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2019-21</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>		
St. Louis MO-IL MSA	20	3,295	100	848	84.2	95	47.8	4.6	5	11.2	0		
<b>Total</b>	<b>20</b>	<b>3,295</b>	<b>100</b>	<b>848</b>	<b>84.2</b>	<b>95</b>	<b>47.8</b>	<b>4.6</b>	<b>5</b>	<b>11.2</b>	<b>0</b>		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*