

MEMBER FDIC



FELICIANA BANK
AND TRUST COMPANY SINCE 1904

Community Reinvestment Act (CRA) Public File

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**FELICIANA BANK AND TRUST COMPANY
BRANCH INFORMATION**

BRANCH LOCATION	CENSUS TRACT	LOBBY HOURS	DRIVE IN HOURS	ALTERNATIVE DELIVERY SYSTEMS	DESCRIPTION OF DIFFERENCES IN SERVICES
MAIN OFFICE 10926 Plank Road Clinton, LA 70722	9516.00	Monday – Thursday 9 a.m. – 4 p.m. Friday 9 a.m. – 5:30 p.m. Saturday -Lobby Closed	Monday – Friday 9 a.m. – 5:30 p.m. Saturday 9 a.m. – 12 p.m.	ATM NIGHT DROP	NONE- Full Service
NORWOOD OFFICE 13411 Main Street Norwood, LA 70761	9513.00	Monday – Thursday 9 a.m. – 4 p.m. Friday 9 a.m. – 5:30 p.m. Saturday - Closed	Monday – Thursday 9 a.m. – 4 p.m. Friday 9 a.m. – 5:30 p.m. Saturday - Closed	ATM NIGHT DROP	NONE- Full Service
BLUFF CRREK OFFICE 503 Highway 37 Clinton, LA 70722	9516.00	Monday – Thursday 9 a.m. – 4 p.m. Friday 9 a.m. – 5:30 p.m. Saturday - Closed	Monday – Thursday 9 a.m. – 4 p.m. Friday 9 a.m. – 5:30 p.m. Saturday - Closed	ATM NIGHT DROP	NONE- Full Service

Revised: 01/2024

FELICIANA BANK & TRUST COMPANY

BRANCHES OPENED AND CLOSED

FOR CURRENT YEAR 2024 & PRIOR YEARS 2022 & 2023

LOCATION	CENSUS TRACT	DATE OPENED OR CLOSED
NONE	NA	NA

Revised: 01/2024

FELICIANA BANK & TRUST COMPANY

DEPOSIT ACCOUNT PRODUCTS OFFERED

Consumer Accounts	Commercial Accounts
Regular Checking	Commercial Checking
Interest Bearing Checking Personal	Interest Bearing Checking Commercial
Personal Money Market	Commercial Money Market
Regular Savings	Regular Savings
Christmas Club	Certificate of Deposit (various terms)
Individual Retirement Account (IRA)	
Certificate of Deposit (various terms)	
Non-Profit Accounts	Public Funds
Non Profit Checking	Public Funds Checking
Interest Bearing Checking Non Profit	Interest Bearing Checking Public Funds
Non-Profit Savings	Certificate of Deposit (various terms)
Certificate of Deposit (various terms)	

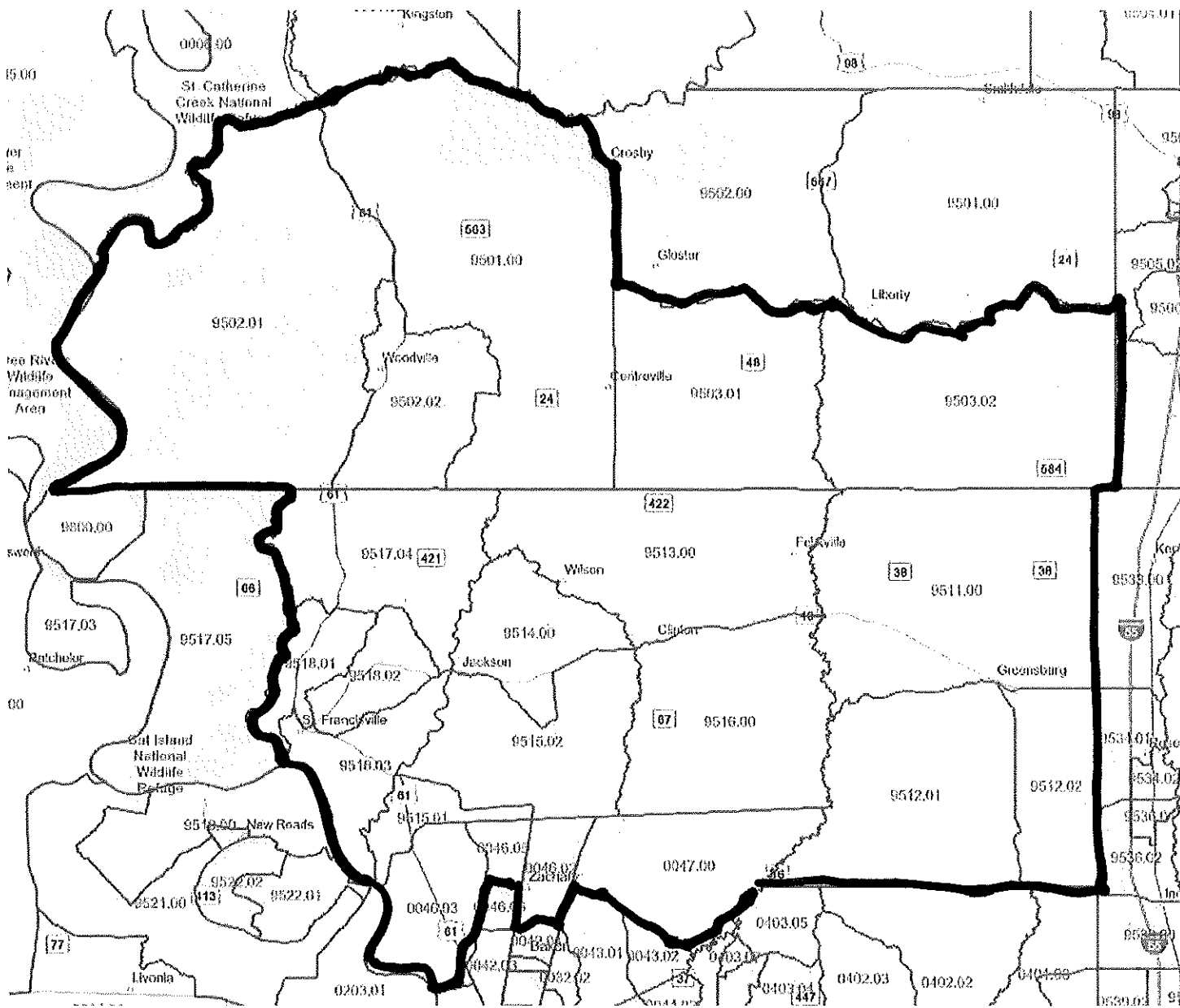
LOAN PRODUCTS OFFERED

Consumer –Term, Draw Down and Balloon Loans	Agricultural and Commercial – Revolving, Term, Draw Down and Balloon Loans
Unsecured	Unsecured
Motor Vehicle	Motor Vehicle
Secured	Secured
Deposit Account Secured	Deposit Account Secured
Real Estate Mortgage – Residential Properties	Real Estate Mortgage – Residential and Commercial Properties
Real Estate Mortgage - Construction	Real Estate Mortgage - Construction and Land Development
Real Estate Mortgage – Lots, Land and Acreage	Real Estate Mortgage – Lots, Land and Acreage
Small Dollar Loan	

FELICIANA BANK & TRUST COMPANY

PRODUCTS AND SERVICES OFFERED

Cashier's Checks	Online Banking
Safe Deposit Box Rental	Online Bill Payment
VISA Debit Card	Mobile Banking
e-Statement	Mobile Deposit
Remote Deposit Capture	Telephone Banking
Direct Deposit	Wire Transfer
Night Depository	Cash Advances
Automated Teller Machine (ATM) at Clinton Branch (Main Office)	Overdraft Protection – Automatic Transfer
Automated Teller Machine (ATM) at Norwood Branch	Merchant Services
Automated Teller Machine (ATM) at Bluff Creek Branch	



MAP OF FELICIANA BANK & TRUST COMPANY ASSESSMENT AREA

FELICIANA BANK AND TRUST COMPANY ASSESSMENT AREA

LA - E. Feliciana Parish Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
9513.00	Middle	No	98.82	\$82,900	\$81,922	\$77,031	2670	52.36	1398	1119	1719
9514.00	Moderate	No	71.24	\$82,900	\$59,058	\$55,536	3462	52.31	1811	863	1452
9515.01	Middle	No	82.05	\$82,900	\$68,019	\$63,958	1220	25.57	312	591	764
9515.02	Middle	No	86.71	\$82,900	\$71,883	\$67,595	7109	36.87	2621	1352	2028
9516.00	Upper	No	129.35	\$82,900	\$107,231	\$100,833	5078	39.11	1986	1690	2363

LA - W. Feliciana Parish Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
9517.04	Middle	No	104.79	\$82,900	\$86,871	\$81,684	1332	32.51	433	578	1026
9517.05	Moderate	No	65.92	\$82,900	\$54,648	\$51,389	1560	58.72	916	657	1278
9518.01	Moderate	No	69.5	\$82,900	\$57,616	\$54,175	2023	39.69	803	343	622
9518.02	Middle	No	113.85	\$82,900	\$94,382	\$88,750	1364	29.62	404	546	672
9518.03	Upper	No	169.58	\$82,900	\$140,582	\$132,188	3403	23.33	794	920	1433

LA - E. Baton Rouge Parish Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
0046.02	Middle	No	86.68	\$82,900	\$71,858	\$67,568	6500	60.06	3904	1509	2382
0046.03	Middle	No	100.67	\$82,900	\$83,455	\$78,472	6383	62.85	4012	1029	1503
0046.05	Upper	No	129.18	\$82,900	\$107,090	\$100,700	7286	44.1	3213	2042	2415
0047.00	Middle	No	90.60	\$82,900	\$75,107	\$70,625	5448	33.7	1836	1540	2368

LA - St. Helena Parish Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
9511.00	Middle	No	100.86	\$82,900	\$83,613	\$78,620	3816	53.04	2024	1275	2040
9512.01	Moderate	No	77.84	\$82,900	\$64,529	\$60,679	4279	60.27	2579	1127	2124
9512.02	Low	No	48.87	\$82,900	\$40,513	\$38,095	2825	64.53	1823	619	1065

MS - Amite County Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
9503.01	Middle	Yes*	89.96	\$64,200	\$57,754	\$47,686	2064	48.84	1008	838	1093
9503.02	Moderate	No	56.24	\$64,200	\$36,106	\$29,813	2378	51.64	1228	723	1173

MS - Wilkinson County Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
9501.00	Moderate	No	77.89	\$64,200	\$50,005	\$41,287	3350	61.91	2074	1104	1968
9502.01	Low	No	41.21	\$64,200	\$26,457	\$21,847	2056	77.24	1588	770	1827
9502.02	Middle	Yes*	91.00	\$64,200	\$58,422	\$48,235	3181	75.45	2400	742	1216

FELICIANA BANK & TRUST COMPANY

LOAN TO DEPOSIT RATIOS

FOR PRIOR YEAR 2023

December 31, 2023	90.90%
September 30, 2023	86.03%
June 30, 2023	87.11%
March 31, 2023	85.23%

FELICIANA BANK & TRUST COMPANY

RECORD OF WRITTEN COMMENTS

FOR CURRENT YEAR 2024 & PRIOR YEARS 2022 & 2023

DATE RECEIVED	NAME & ADDRESS OF COMMENTOR	NATURE OF COMMENT	BANK'S RESPONSE OR ACTION TAKEN (INCLUDE DATE)

Record of written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs.

Written comments and bank response are attached unless they contain statements that reflect adversely on the good name or reputation of any persons or if publication would violate law.

Revised: 01/2024

HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about our loan approvals and denials.

These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda).

HMDA data for many other financial institutions are also available at this Web site.

PUBLIC DISCLOSURE

December 6, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Feliciano Bank & Trust Company
Certificate Number: 1380

10926 Plank Road
Clinton, Louisiana 70722

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

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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.

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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 (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The loan-to-deposit (LTD) ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and AA's credit needs.
- A majority of loans are in the institution's AA.
- The geographic distribution of loans reflects excellent dispersion throughout the AA.
- The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different incomes and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the institution's rating.

DESCRIPTION OF INSTITUTION

Background

Feliciana Bank & Trust Company (FB), headquartered in Clinton, Louisiana, began operations in 1904. Feliciana Bancshares, Inc., Clinton, Louisiana, a one-bank holding company, wholly owns the bank. FB received a "Satisfactory" rating at its previous FDIC CRA Performance Evaluation, dated August 10, 2015, based on Small Institution Examination Procedures.

Operations

FB functions as a retail bank from its three full-service offices in Louisiana. The institution offers various loan products including commercial, home mortgage, agriculture, and consumer loans, primarily focusing on commercial and home mortgage lending. Bank management worked with the Small Business Administration to offer loans in conjunction with the Paycheck Protection Program (PPP) in response to the COVID-19 pandemic. FB originated 490 PPP loans totaling \$7.8 million during the evaluation period. The bank offers a variety of deposit services including personal checking and savings accounts, money market deposit accounts, and certificates of deposit accounts. Alternative banking systems include internet and mobile banking, electronic bill pay, and two automated teller machines (ATMs). FB did not open or close any offices, and no merger or acquisition activities occurred since the previous evaluation.

Based on Call Report data as of September 30, 2021, total assets equaled \$149.6 million, net loans equaled \$89.5 million, and total deposits equaled \$124.3 million. Since the previous evaluation, on

average per year, total assets increased by 5.2 percent, net loans increased by 2.1 percent, and total deposits increased 4.1 percent. The following table represents the outstanding loan portfolio as of September 30, 2021.

Loan Portfolio Distribution as of 9/30/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	14,554	16.0
Secured by Farmland	8,697	9.6
Secured by 1-4 Family Residential Properties	35,423	39.0
Secured by Multi-Family (5 or more) Residential Properties	449	0.5
Secured by Non-Farm Non-Residential Properties	16,665	18.3
Total Real Estate Loans	75,788	83.4
Commercial and Industrial Loans	10,471	11.5
Agricultural Production and Other Loans to Farmers	1,998	2.2
Consumer Loans	2,678	2.9
Total Loans	90,935	100.0
<i>Source: Reports of Condition and Income.</i>		

Examiners did not identify any financial, legal, or other impediments that limit the institution’s ability to meet the credit needs of its AA.

DESCRIPTION OF ASSESSMENT AREA

Since the previous evaluation, the bank expanded its AA by adding portions of East Baton Rouge Parish, portions of West Feliciana Parish, and the entirety of St. Helena Parish in Louisiana, as well as portions of Amite County and portions of Wilkinson County in Mississippi.

The bank now designates a single AA consisting of 15 census tracts from a portion of the Baton Rouge, Louisiana, Metropolitan Statistical Area (Baton Rouge MSA) and a portion of the Mississippi Non-Metropolitan Statistical Area (MS Non-MSA). The AA includes East Baton Rouge Parish (4 of 92 census tracts), East Feliciana Parish (all 5 census tracts), St. Helena Parish (all 2 census tracts), and West Feliciana Parish (2 of 3 census tracts) in the Baton Rouge MSA, Amite County (1 of 3 census tracts) and Wilkinson County (1 of 2 census tracts) in the MS Non-MSA.

Since the bank does not operate offices in Mississippi, examiners concluded the contiguous census tracts in Amite and Wilkinson Counties in the MS Non-MSA do not extend substantially across the state boundaries and are included in the bank’s Baton Rouge MSA AA. The AA conforms to technical CRA regulatory requirements.

Economic and Demographic Data

According to 2015 American Community Survey (ACS) data, the AA includes six moderate-, six middle-, and three upper-income census tracts. The bank’s main office and two branch offices operate in moderate-income census tracts. The following table provides additional demographic data for the AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	40.0	40.0	20.0	0.0
Population by Geography	81,307	0.0	31.4	37.9	30.7	0.0
Housing Units by Geography	33,004	0.0	38.2	35.1	26.7	0.0
Owner-Occupied Units by Geography	22,487	0.0	36.1	36.1	27.8	0.0
Occupied Rental Units by Geography	5,396	0.0	33.1	37.1	29.8	0.0
Vacant Units by Geography	5,121	0.0	52.8	28.6	18.6	0.0
Businesses by Geography	5,469	0.0	27.6	35.7	36.7	0.0
Farms by Geography	247	0.0	30.0	39.7	30.4	0.0
Family Distribution by Income Level	20,370	25.4	17.1	16.8	40.6	0.0
Household Distribution by Income Level	27,883	27.5	14.1	15.6	42.7	0.0
Median Family Income MSA - 12940 Baton Rouge, LA MSA		\$65,593	Median Housing Value			\$135,048
Median Family Income Non-MSAs - MS		\$43,897	Median Gross Rent			\$774
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS Data and 2020 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.</i>						

The middle-income tract in Amite County received a distressed designation due to poverty since the last evaluation. The middle-income tract in Wilkinson County received distressed and underserved designations since the last evaluation; this was due to higher poverty and unemployment levels, as well as its remote location. The AA received 13 major disaster declarations during the review period from the Federal Emergency Management Agency (FEMA) as a result of multiple natural disasters.

According to the City and Parish websites, major employers in the AA include Louisiana State Government, Louisiana State Penitentiary, Entergy Operations Inc., and Parish Public Schools. The economic outlook and unemployment levels changed significantly in April 2020 due to the national state of emergency related to the COVID-19 pandemic. According to the Bureau of Labor Statistics, unemployment levels increased sharply at the onset of the pandemic, declined gradually during the year, and remained well above levels posted in 2019 as seen in the following table.

Year-End Unemployment Rates			
Area	2018	2019	2020
East Baton Rouge Parish (LA)	4.3	4.3	7.8
East Feliciana Parish (LA)	4.6	4.5	6.7
St. Helena Parish (LA)	6.5	5.9	11.5
West Feliciana Parish (LA)	3.8	3.9	5.4
Amite County (MS)	6.4	7.1	8.4
Wilkinson County (MS)	8.9	10.3	13.4
State of Louisiana	4.8	4.7	8.3
State of Mississippi	5.0	5.5	8.1
Nationwide	3.9	3.7	8.1

Source: Bureau of Labor Statistics

Examiners used the applicable FFIEC-updated median family income levels to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle-, and upper-income ranges based on the 2020 FFIEC-updated median family income of \$73,800 for the Baton Rouge MSA and \$49,800 for the MS Non-MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Baton Rouge, LA MSA Median Family Income (12940)				
2020 (\$73,800)	<\$36,900	\$36,900 to <\$59,040	\$59,040 to <\$88,560	≥\$88,560
Nonmetropolitan MS Median Family Income (99999)				
2020 (\$49,800)	<\$24,900	\$24,900 to <\$39,840	\$39,840 to <\$59,760	≥\$59,760

Source: FFIEC

Competition

The area reflects a high level of competition for financial services. According to FDIC Deposit Market Share data as of June 30, 2021, 34 financial institutions operate 134 full-service offices within the AA. Of these institutions, FB ranked 16th with 0.6 percent deposit market share.

Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community needs. This information helps determine financial institutions' responsiveness to these needs and indicates available credit opportunities.

Examiners performed one community contact with a representative of an economic development organization located in the AA. The contact described the area's current economic condition in need of affordable housing and small business lending due to numerous closings from the COVID-19 pandemic. The contact also specified a need for financial literacy and education. Overall, the

contact felt that financial institutions demonstrate community involvement and responsiveness to the credit needs of the area.

Credit Needs

Considering information obtained from the community contact, demographic data, and bank management, examiners determined that residential and commercial loans represent the primary credit needs of the AA. Small business loans, particularly those for retail businesses, remain in high demand due to the negative economic impact of the COVID-19 pandemic.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated August 10, 2015, to the current evaluation dated December 6, 2021. To evaluate performance, examiners applied Small Institution Procedures, which include the Lending Test. The appendix lists the evaluation criteria for these procedures.

Activities Reviewed

Small Institution Procedures require examiners to determine the bank’s major product lines for review. Examiners may select from among the same loan categories used for Large Bank CRA evaluations, including home mortgage, small business, small farm, and consumer loans. The following table shows the bank’s originations and purchases over the most recent completed calendar year by loan type.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	5,886	25.3	32	10.3
Secured by Farmland	902	3.9	5	1.6
Secured by 1-4 Family Residential Properties	10,080	43.4	69	22.1
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	1,690	7.3	7	2.2
Commercial and Industrial Loans	3,293	14.2	111	35.6
Agricultural Loans	427	1.8	8	2.6
Consumer Loans	942	4.1	80	25.6
Other Loans	0	0.0	0	0.0
Total Loans	23,220	100.0	312	100.0

Source: 2020 Bank Data.

Considering the dollar volume and number of loans originated, as well as management’s stated business strategy, examiners determined that the bank’s major product lines consist of residential loans and commercial loans. Since the other categories typically reviewed for CRA, including small farm and consumer loans, do not represent major product lines and thus would not materially

affect any conclusions or ratings, this evaluation does not include a review of them. Bank records indicate that the lending focus and product mix remained generally consistent throughout the evaluation period.

Although FB was subject to reporting home mortgage loans under the Home Mortgage Disclosure Act (HMDA) through 2019, HMDA reporting requirements no longer apply to the bank. As a result, examiners reviewed home mortgage loans originated in 2020 as listed on FB’s loan trial. Examiners considered the home mortgage universe for assessing assessment area concentration and geographic distribution. For borrower profile, examiners analyzed a random sample of 36 home mortgage loans totaling over \$4.3 million from the universe of 69 such loans totaling over \$10.0 million originated in 2020. Examiners compared the bank’s home mortgage lending to 2015 American Community Survey (ACS) data.

Additionally, examiners considered the small business universe for assessing assessment area concentration and geographic distribution. For borrower profile, examiners analyzed a random sample of 47 small business loans totaling over \$1.5 million from the universe of 118 such loans totaling over \$4.9 million originated in 2020. D&B data for 2020 provided a standard comparison for small business loans.

As reflected in the following table, examiners considered the universes by dollar volume and number of loans, as well as management’s stated business strategy to determine the weighting applied to the loan categories reviewed, when arriving at applicable conclusions. Based on the bank’s lending focus and recent lending activity for home mortgage and small business loans, examiners applied equal weight to home mortgage and small business loans when arriving at overall conclusions.

Loan Products Reviewed				
Loan Category	Universe			
	#	%	\$(000s)	%
Home Mortgage	69	36.9	10,080	66.9
Small Business	118	63.1	4,983	33.1
Total Loans	187	100.0	15,063	100.0
<i>Source: 2020 Bank Data.</i>				

While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans since the number of loans better indicates the number of individuals and businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

FB demonstrated satisfactory performance regarding the Lending Test. An excellent record regarding geographic distribution, a reasonable LTD ratio, a majority of loans originated inside the AA, and reasonable borrower profile support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and AA's credit needs. The LTD ratio, calculated from Call Report data, averaged 86.3 percent over the past 25 calendar quarters from September 30, 2015, to September 30, 2021, representing an increase from the 72.6 percent average net LTD ratio noted at the previous evaluation. The ratio ranged from a low of 72.0 percent as of September 30, 2021, to a high of 95.4 percent as of December 31, 2019.

Examiners identified and listed in the following table two comparable institutions operating within the bank's AA and reporting similar asset sizes and lending emphases. As seen in the table, the bank's average net LTD ratio reflects similar performance to comparable institutions.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 9/30/2021 (\$000s)	Average Net LTD Ratio (%)
Feliciana Bank & Trust, Clinton, LA	149,560	86.3
Landmark Bank, Clinton, LA	163,135	76.5
Bank of St. Francisville, Saint Francisville, LA	209,958	82.1
<i>Source: Reports of Condition and Income 9/30/2015 - 9/30/2021.</i>		

Assessment Area Concentration

A majority of loans are in the institution's AA. As seen in the following table, a majority of home mortgage and small business loans, by number and dollar volume, originated inside the AA supports this conclusion.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	48	69.6	21	30.4	69	5,698	56.5	4,382	43.5	10,080
Small Business	96	81.4	22	18.6	118	3,256	65.3	1,727	34.7	4,983
<i>Source: 2020 Bank Data.</i>										

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the AA. Excellent performance regarding home mortgage and small business lending supports this conclusion. Examiners focused on the percentage by number of loans in moderate-income census tracts in the AA when arriving at conclusions for this criterion since the AA does not contain any low-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the AA. The following table shows that the bank's level of lending in moderate-income geographies notably exceeds demographic data by 34.7 percentage points, evidencing excellent performance.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	0.0	0	0.0	0	0.0
Moderate	36.1	34	70.8	3,795	66.6
Middle	36.1	8	16.7	991	17.4
Upper	27.8	6	12.5	912	16.0
Total	100.0	48	100.0	5,698	100.0

Source: 2015 ACS Data; 2020 Bank Data.

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the AA. The following table shows that the bank's level of lending in moderate-income geographies surpasses demographic data by 39.1 percentage points, reflecting excellent performance.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	0.0	0	0.0	0	0.0
Moderate	27.6	64	66.7	2,087	64.1
Middle	35.7	17	17.7	520	16.0
Upper	36.7	15	15.6	649	19.9
Total	100.0	96	100.0	3,256	100.0

Source: 2020 D&B Data; 2020 Bank Data.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels and businesses of different sizes. Reasonable records regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. Examiners focused on the percentage by number of loans to borrowers in the AA with low- and moderate-income levels when arriving at conclusions for this performance factor.

As reflected in the following table, the bank’s level of lending to low-income borrowers falls slightly below demographic data by 5.9 percentage points, reflecting reasonable performance. The table further shows that to moderate-income borrowers the bank’s percentage of lending exceeded demographic data by 7.8 percentage points, which reflects reasonable performance.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	25.4	7	19.5	552	12.8
Moderate	17.2	9	25.0	1,110	25.7
Middle	16.8	3	8.3	438	10.1
Upper	40.6	17	47.2	2,219	51.4
Not Available	0.0	0	0.0	0	0.0
Total	100.0	36	100.0	4,319	100.0

Source: 2015 ACS; 2020 Bank Data

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. Examiners focused on the percentage by number of loans to businesses in the AA with gross annual revenue (GAR) of \$1 million or less when arriving at conclusions for this performance factor.

The following table shows that the bank originated a majority of its small business loans to businesses with GAR of \$1 million or less. FB granted more than eight out of every ten small business loans to businesses with gross annual revenue of \$1 million or less, reflecting reasonable performance. Furthermore, the bank originated the greatest percentage of small business loans to businesses in the lowest gross annual revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	56.0	17	36.2	490	31.9
\$100,000 - \$249,999	27.4	7	14.9	83	5.4
\$250,000 - \$499,999	4.3	8	17.0	228	14.8
\$500,000 - \$1,000,000	2.2	6	12.8	307	20.0
Subtotal ≤ \$1,000,000	89.9	38	80.9	1,108	72.1
> \$1,000,000	2.6	4	8.5	390	25.4
Revenue Not Available	7.5	5	10.6	39	2.5
Total	100.0	47	100.0	1,537	100.0

Source: 2020 D&B Data; 2020 Bank Data.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the bank's compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

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.