



PUBLIC DISCLOSURE

September 19, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens National Bank at Brownwood
Charter Number 14273

1 Carnegie St.
Brownwood, TX 76801

Office of the Comptroller of the Currency

225 E. John Carpenter Fwy, Suite 900
Irving, TX 75062-2270

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 **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) is reasonable.
- A majority of the bank's loans are inside the assessment area (AA).
- The geographic distribution of loans is reasonable.
- The distribution of loans to individuals of different income levels and businesses of different sizes is excellent.
- There were no Community Reinvestment Act (CRA) related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The LTD is calculated on a bank-wide basis. The bank's quarterly LTD ratio since the previous evaluation averaged 51.5 percent, with a quarterly high of 64.3 percent and quarterly low of 37.3 percent. We compared the bank's LTD ratio to four similarly situated institutions in the AA ranging in asset size from \$152 million to \$425 million. The quarterly average LTD ratio for banks in this peer group was 55.1 percent with a high ratio of 62.3 percent and a low ratio of 42.3 percent. The following factors were considered when concluding on the reasonableness of the bank's LTD ratio:

- There was a large number of consumer loans originated during the CRA evaluation period. During the review period, CNB originated a total of 2,990 loans. Of the total, 1,661 were consumer, non-real estate loans and 1,026 were commercial/agricultural loans, which included 357 Small Business Administration (SBA) Paycheck Protection Program (PPP) loans originated in 2020 and 2021. Consumer loans represented 63 percent of originated loans by count, when excluding SBA PPP loans. Consumer loans are generally smaller in dollar amount and contribute to a lower LTD ratio.
- During the review period, CNB originated 303 residential mortgages of which 133, totaling \$21,483M, were sold on the secondary market. This contributes to a lower LTD ratio as these loans are not reflected in the LTD ratio.
- CNB experienced significant deposit growth of 56 percent during the review period. This is primarily attributed to the government stimulus money issued to consumers and PPP loan proceeds issued to businesses during the COVID-19 pandemic. Due to the uncertainty of the pandemic, consumer spending declined while deposits are maintained at the bank.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area.

Our analysis relied on a sample of 90 loans consisting of home mortgage, small business, and consumer loans. The bank originated 85.6 percent by number and 78 percent by dollar of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA,

level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	26	86.7	4	13.3	30	3,093	76.5	951	23.5	4,043
Small Business	24	80.0	6	20.0	30	1,102	81.2	256	18.8	1,358
Consumer	27	90.0	3	10.0	30	174	87.0	26	13.0	199
Total	77	85.6	13	14.4	90	4,368	78.0	1,232	22.0	5,601

Description of Institution

Citizens National Bank at Brownwood (CNB or bank) is a full-service community bank located in Brownwood, Texas. CNB is wholly owned by Brownwood Bancshares, Inc. (BBI), a one-bank holding company. The primary mission of the holding company is ownership of CNB. We did not consider the activities of affiliates in this evaluation.

CNB offers a full range of loan and deposit products, as well as online and telephone banking for individuals and businesses. CNB's physical offices are its primary delivery system for retail products and services. In addition to its main office in Brownwood, the bank has one branch office located inside the Brownwood Wal-Mart Store. Both offices are situated in low-income census tracts. Main office lobby hours are Monday through Friday from 9:00 a.m. to 3:00 p.m. The main office also has a drive-up facility with extended weekday hours from 7:30 a.m. to 6:00 p.m. and Saturday hours of 8:30 a.m. to 12:00 p.m. Branch office hours are Monday through Friday from 10:00 a.m. to 6:00 p.m. and Saturday from 10:00 a.m. to 3:00 p.m. The main office and branch each have an ATM. Additionally, there is an ATM at the front entrance of Heartland Mall in Early, TX and one at the Brownwood Regional Medical Center, both with 24-hour access. The ATM at the main office location now accepts cash and check deposits as of September 2022, but all other ATMs are not full-service. CNB did not engage in any merger or acquisition activity during the evaluation period or open or close any branches.

As of December 31, 2021, CNB had total assets of \$308 million, with net loans representing 34.6 percent of total assets and Tier One Capital at \$29 million. CNB's business strategy is primarily focused on commercial and residential lending in its market area. The bank also actively originates consumer loans, including small dollar unsecured loans. Although consumer loans reflect a low volume of total loans by dollar, consumer loans comprised 63 percent of total lending, when excluding SBA PPP loans, during the evaluation period. As such, commercial, home mortgage, and consumer lending will be evaluated as the bank's primary products.

CNB's banking programs and hours allow the bank to deliver needed banking and credit services to low- and moderate-income (LMI) areas and customers as well as small business owners throughout the bank's AA. CNB offers on-line banking through its web site, *cnb-brownwood.com*. Bank customers can utilize on-line banking and the mobile app at no charge. Telephone banking and ATM services are available in both English and Spanish language. The main office and the branch employ staff who are fluent in Spanish. Further, the bank offers start-up and working capital loans for small businesses and

secured and unsecured small dollar personal loans to qualified customers. CNB also participates in government-guaranteed rural development loans as well as origination of residential mortgage loans that are sold into the secondary market.

The previous CRA evaluation, dated October 2, 2017, assigned a “Satisfactory” rating under the Small Bank Performance Standards. There are no legal or financial impediments to CNB’s ability to meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

CNB was evaluated under the Small Bank CRA evaluation procedures, which includes a Lending Test. The objective of our review was to determine the bank’s record of meeting its community’s credit needs, including that of LMI borrowers. Our review included the bank’s performance from January 1, 2019, through December 31, 2021. Home mortgage, commercial, and consumer lending are the bank’s primary loan products and are included as part of this evaluation. To evaluate the bank’s lending performance, we analyzed a sample of 26 home mortgage, 24 small business loans, and 27 consumer loans originated inside the AA during the evaluation period.

Due to its location, the bank is not required to report home loan data pursuant to the Home Mortgage Disclosure Act (HMDA). As such, we relied upon a sample of home mortgage loans to place the bank’s performance in context with aggregate HMDA lending activity in Brown County, TX.

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.

CNB has delineated one AA that includes all of Brown County, Texas, which consists of 12 census tracts. The bank has properly defined its AA in accordance with the technical requirements of the CRA regulation. The AA consists of whole CTs, does not arbitrarily exclude LMI CTs, and includes CTs where the bank offices are located, and the majority of its loans are originated. The AA does not reflect illegal discrimination.

Ratings

The bank’s overall rating is based entirely on the full scope review of the bank’s AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's 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 Texas

CRA rating for the State of Texas¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A majority of the bank's loans, 85.6 percent by number and 78 percent by dollar, were made inside the AA.
- Distribution of loans is reasonable among individuals and small businesses within the low- to moderate-income level of the geography given the bank's AA and performance context.
- Distribution of loans is excellent among individuals and small businesses within the low- to moderate-income level of the borrower given the bank's AA and performance context.

Description of Institution's Operations in Texas

CNB is a \$295 million institution headquartered in Brownwood, Brown County, TX. CNB is an intrastate bank that provides banking services to the public through its main office, one branch location, and four ATMs, all of which are in the Brown County AA. The Brown County AA encompasses all 12 census tracts located in Brown County, TX. Of this total, two census tracts are designated as low-income, two are moderate-income, seven are middle-income, and one is upper income.

The bank encounters competition from a few well-established community banks, credit unions, and agricultural lenders in the AA. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2021, there are 6 banks operating in Brown County, with CNB holding 30 percent of the deposit market share. FNB is ranked second with \$242 million in deposits. Other banks with notable market share include Texas Bank (45 percent), Mcbank (11 percent), and Prosperity Bank (8 percent). There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.

We met with two community contacts within the AA to obtain a community profile and identify opportunities for community development. Although the market experienced some economic impact from COVID-19 lockdowns, local economic conditions are now stable and exhibit some signs of strength. Brown County continues to experience net migration, resulting in issues with low housing inventories. Given minimum new construction starts, a community contact indicated that the demand for loans to renovate existing residential homes is poised to increase. Further, the City of Brownwood is experiencing some revitalization in the downtown area. This involves renovation of store fronts by existing businesses as well as new small business entrants into the market. Community contacts indicated that local financial institutions are doing a good job at providing business financing and contacts did not identify any unmet credit needs for local small businesses.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

The city of Brownwood has a diversified economy, with an emphasis on manufacturing, healthcare, and government/education services. Several companies maintain manufacturing facilities in Brownwood, such as 3-M Company, Kohler, and Superior Essex. Other major employers include Brownwood ISD, the City of Brownwood, Hendricks Medical Center, Excel Health, and Howard Payne University. Many workers commute from neighboring rural areas and towns, such as Early, May, Blanket, and Bangs. Outside of Brownwood, agricultural/livestock operations are the dominant industry.

Brown County Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Brown County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	16.7	16.7	58.3	8.3	0.0
Population by Geography	37,833	10.9	14.2	66.2	8.7	0.0
Housing Units by Geography	18,419	8.9	12.8	71.4	6.9	0.0
Owner-Occupied Units by Geography	9,399	6.2	10.7	73.1	10.0	0.0
Occupied Rental Units by Geography	3,896	20.1	19.7	57.1	3.1	0.0
Vacant Units by Geography	5,124	5.3	11.5	79.1	4.2	0.0
Businesses by Geography	2,339	23.8	11.2	57.4	7.7	0.0
Farms by Geography	122	10.7	6.6	68.9	13.9	0.0
Family Distribution by Income Level	9,208	20.7	18.9	21.7	38.7	0.0
Household Distribution by Income Level	13,295	23.8	17.5	18.4	40.4	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$88,440
			Median Gross Rent			\$666
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Texas

A full-scope review was performed on the bank’s Brown County AA for the evaluation period covering January 1, 2019 to December 31, 2021.

LENDING TEST

The bank’s performance under the Lending Test in Texas is rated Satisfactory.

Conclusions for Brown County AA Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Brown County AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

The percentage of home loans in low-income geographies is somewhat lower than the percentage of owner-occupied housing units in these areas but exceeds performance from other area lenders as reported in the Aggregate Lending (aggregate) data. The percentage of home loans in moderate-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending performance within these tracts.

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

Small Loans to Businesses

The percentage of small business loans located in low-income geographies is somewhat lower than the percentage of businesses and the aggregate lending data in these geographies. Also, the percentage of small business loans located in moderate-income geographies is somewhat lower than the percentage of businesses in these tracts but near to aggregate lending performance.

LMI census tracts within the AA largely comprise downtown Brownwood and adjoining portions of the City of Brownwood. While the downtown has experienced some revitalization and new business development in the past three years, LMI geographies contain many long-standing businesses that do not require ongoing financing. This presents a potential challenge for fully penetrating the businesses demographic within LMI geographies. Further, community contacts indicated that small businesses continue to receive ample support from local financial institutions and did not identify any unmet credit needs for small business owners in Brownwood. Given these factors, less emphasis will be placed on the bank's small business lending performance when assessing overall geographic lending distribution.

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Consumer Loans

The percentage of consumer loans to borrowers located in low-income geographies was somewhat lower than the percentage of households located in low-income census tracts. Conversely, the bank's lending performance within moderate-income census tracts exceeded the demographic benchmark.

Refer to Table U in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Lending Gap Analysis

The bank's loan originations in LMI geographies during the performance evaluation period did not reflect any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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

The percentage of home loans to low-income borrowers was lower than the percentage of families identified as low-income, but exceeded the aggregate lending to low-income borrowers within the AA. One noteworthy challenge is the bank's AA has a 13.8 percent poverty rate, which likely limits the bank's ability to fully penetrate the low-income borrower demographic. Lending to moderate-income borrowers was near to the percentage of families identified as moderate-income and exceeded the aggregate lending to moderate-income borrowers.

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

Small Loans to Businesses

The percentage of loans to businesses with annual revenues of \$1 million or less is equal to the reported percentage of small businesses in the AA and exceeds the aggregate lender performance in the AA.

Refer to Table R in the state of Texas section of 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.

Consumer Loans

The percentage of consumer loans to low-income individuals exceeded the percentage of low-income households in the AA. The bank's consumer lending to moderate-income individuals also exceeded the percentage of moderate-income households in the AA.

Refer to Table V in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Responses to Complaints

CNB and the OCC have not received any complaints regarding CRA over the evaluation period.

Appendix A: Scope of Examination

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”.

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, and consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Texas		
Brown County AA	Full-scope	Entire county consisting of 12 whole census tracts.

Appendix B: Summary of MMSA and State Ratings

RATINGS Citizens National Bank at Brownwood	
Overall Bank:	Lending Test Rating
Citizens National Bank at Brownwood	Satisfactory
MMSA or State:	
Texas	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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 30th 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 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
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	
Brown County AA	26	3,092,630	100.0	913	6.2	3.8	2.5	10.7	11.5	9.4	73.1	73.1	79.1	10.0	11.6	9.0	0.0	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21	
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	
Brown County AA	26	3,092,630	100.0	913	20.7	7.7	2.1	18.9	15.4	10.2	21.7	30.8	17.7	38.7	46.1	39.5	0.0	0.0	30.4	
<i>Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Brown County AA	24	1,102,035	100.0	320	23.8	12.5	18.8	11.2	8.3	8.8	57.4	66.7	65.0	7.7	12.5	7.5	0.0	0.0	0.0
<i>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%</i>																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Brown County AA	24	1,102,035	100.0	320	79.1	79.2	40.3	5.0	20.8	15.9	0.0	
<i>Source: 2020 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%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Brown County AA	27	173,584	100.0	10.3	7.4	13.3	18.5	68.4	70.4	8.0	3.7	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Brown County AA	27	173,584	100.0	23.8	29.7	17.5	33.3	18.4	22.2	40.4	14.8	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														