## INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

June 02, 2025

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Murray Bank Charter Number: 715834

405 South 12th Street Murray, Kentucky 42071

Office of the Comptroller of the Currency 10200 Forest Green Boulevard, Suite 501 Louisville, Kentucky 40223

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: Satisfactory** 

The lending test rating: Satisfactory

The community development test rating: Satisfactory

The major factors that support these ratings include:

- The lending test rating is based on an excellent geographic distribution and reasonable distribution of loans to individuals of different income levels and businesses of different sizes in Kentucky.
- A substantial majority of The Murray Bank's (TMB or bank) loans were originated inside its assessment area (AA).
- TMB's loan-to-deposit (LTD) ratio was reasonable given the bank's size, financial condition, and credit needs of its AA.
- The community development (CD) test rating is based on adequate responsiveness to community needs through qualified CD investments and services.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. TMB's quarterly LTD ratio averaged 70.2 percent over the 12-quarter evaluation period, with a quarterly high of 79.2 percent and a quarterly low of 56.2 percent. The average LTD ratio is reasonable compared to four similarly situated banks with averages ranging from 47.5 percent to 75.5 percent.

#### **Lending in Assessment Area**

A substantial majority of the bank's loans were inside its AA. Management originated or purchased 75.0 percent of its total loans by number, and 68.9 percent by dollar, inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA level.

| Table 1: Lending Ir | nside and O | utside of the | Assessme | nt Area |         |       |                                 |       |                   | 2022 - 2024 |  |  |  |
|---------------------|-------------|---------------|----------|---------|---------|-------|---------------------------------|-------|-------------------|-------------|--|--|--|
|                     |             | Number o      | f Loans  |         | Total # | Dol   | Dollar Amount of Loans \$(000s) |       |                   |             |  |  |  |
| Loan Category       | In          | side          | Ou       | tside   |         | Ins   | side                            | Out   | Total<br>\$(000s) |             |  |  |  |
|                     | #           | %             | #        | %       |         | \$    | %                               | \$    | %                 | 1           |  |  |  |
| Home Mortgage       | 15          | 75.0          | 5        | 25.0    | 20      | 1,067 | 50.3                            | 1,054 | 49.7              | 2,121       |  |  |  |
| Small Business      | 15          | 75.0          | 5        | 25.0    | 20      | 2,498 | 81.9                            | 553   | 18.1              | 3,051       |  |  |  |
| Total               | 30          | 75.0          | 10       | 25.0    | 40      | 3,565 | 68.9                            | 1,607 | 31.1              | 5,172       |  |  |  |
| Source: 1/1/2022 -  | 12/21/2024  | Rank Data     | •        | •       | •       | •     |                                 | •     | •                 | •           |  |  |  |

Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%

## **Description of Institution**

TMB is a full-service, intrastate bank headquartered in Murray, Kentucky. The bank is wholly owned by BancKentucky, Inc., a one-bank holding company. The bank operates three branch locations, all with full-service automated teller machines and five stand-alone cash machines located in businesses throughout Calloway County. There have not been any significant changes to TMB's corporate structure, including merger or acquisition activities or opening or closing of branch locations since the last CRA evaluation.

The bank is a full-service lender offering traditional lending and deposit products and services. Retail products offered include personal checking and savings accounts, individual retirement accounts, residential purchase, refinance, and construction loans, auto loans, and unsecured personal loans. Similar products are also offered to business and agricultural customers, including commercial real estate loans, equipment loans, commercial loans, and agricultural and land loans, and commercial lines of credit. Additional services offered include online and mobile banking services, online bill pay, remote deposit capture, and safe deposit boxes.

As of December 31, 2024, TMB had \$513.1 million in total assets with \$472.7 million in total deposits, \$374.8 million in loans, and \$49.4 million in tier 1 capital. Net loans and leases represented 69.1 percent of average assets with one-to-four family home mortgage loans comprising the largest portion of the loan portfolio at 39.8 percent of total loans. Other types of loans representing a significant portion of the portfolio include commercial real estate loans at 24.0 percent of total loans, commercial and industrial loans at 13.6 percent, and agricultural loans at 13.5 percent.

The bank has one AA for CRA purposes that encompasses the entirety of Calloway County. The AA includes all census tracts (CT) within the county, which include one low-income tract, one moderate-income tract, three middle-income tracts, and six upper-income tracts. The AA does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income CTs.

There were no legal or financial factors that impacted the bank's ability to meet the credit needs of the AA during the review period.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

The Office of the Comptroller of the Currency (OCC) assessed TMB's CRA performance using the OCC's Intermediate Small Bank procedures, which include lending and CD tests. The lending test evaluated the bank's record of meeting the credit needs of its AA through its lending activities spanning from January 1, 2022, through December 31, 2024. The CD test evaluated the bank's CD lending, qualified investments, and CD service activities for the same period. Conclusions regarding the bank's lending performance were based on a random sample of the primary lending products.

Examiners used call report data as of December 31, 2024, to calculate the bank's quarterly LTD ratio. The lending test includes an analysis of the bank's primary loan products. Our determination of primary products was based on dollar volume rather than the number of loans originated during the evaluation period.

#### Selection of Areas for Full-Scope Review

The bank's only AA, the entirety of Calloway County, Kentucky, received a full-scope review. Refer to *Appendix A: Scope of Examination* for more information.

#### **Ratings**

The bank's overall rating is based on the state of Kentucky rating. The state rating is based on the full-scope review of TMB's single AA. In assessing performance, examiners placed more weight on the distribution of home mortgage loans by borrower income level than by the income level of the geography. This weighing was due to the fact there was only one low-income and one moderate-income CT within the AA during the evaluation period.

## **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 Kentucky**

**CRA** rating for the state of Kentucky: Satisfactory

The lending test rating: Satisfactory

The community development test rating: Satisfactory

The major factors that support these ratings include:

- The bank's geographic distribution of loans in the state was excellent.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes was reasonable.
- The bank exhibited adequate responsiveness to CD needs in the state through CD qualified investments and CD services, as appropriate, considering the bank's capacity and the needs and availability of such opportunities for CD in the bank's AAs.
- TMB did not receive any CRA-related complaints during the evaluation period.

#### **Description of Institution's Operations in Kentucky**

TMB has one AA in the state of Kentucky. The AA includes the entirety of Calloway County. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate- income CTs. The largest city in the AA is Murray, Kentucky. Refer to *Appendix A* for more details on the AA.

The total population of the AA is 37,103. Calloway County consists of 11 CTs with one low-income tract, one moderate-income tract, three middle-income tracts, and six upper-income tracts. Calloway County was not designated as distressed or underserved for any portion of the evaluation period.

The bank has strong competition within the AA. The June 30, 2024, FDIC Deposit Market Share Report shows 10 financial institutions operating 15 branch locations within the AA, including TMB. Of the financial institutions, TMB ranks first in deposit market share at 38.1 percent. The bank's major competitors in the AA were Community Financial Services Bank with 19.5 percent market share, Truist Bank with 8.9 percent and Regions Bank with 8.9 percent.

The average unemployment rate for Calloway County during the evaluation period was 4.3 percent, below the state employment rate of 4.5 percent. Major industries in the AA include education, manufacturing, and healthcare.

A community contact identified general funding for homebuyers, and job creation as the primary needs of the AA. The community contact organization provides a range of services to senior citizens and low- to moderate-income individuals. Services provided by the organization include emergency food and shelter, utility assistance, and general senior services. Opportunities for

community reinvestment include providing general financial programs, and information technology support in the local area. The contact indicated local banks are active in meeting the community's needs.

The following table shows demographic information covering the TMB's AA of Calloway County.

## Non-MSA AA of Calloway County in Kentucky.

| Table A – Do                                 | emograp | hic Inform | ation of the Asse | ssment Area    |               |            |  |  |  |  |  |  |
|--|---------|------------|-------------------|----------------|---------------|------------|--|--|--|--|--|--|
| Assessment Area: Calloway County in Kentucky |         |            |                   |                |               |            |  |  |  |  |  |  |
| Demographic Characteristics                  | #       | Low % of # | Moderate % of #   | Middle % of #  | Upper % of #  | NA* % of # |  |  |  |  |  |  |
| Geographies (Census Tracts)                  | 11      | 9.09       | 9.09              | 27.27          | 54.55         | 0.00       |  |  |  |  |  |  |
| Population by Geography                      | 37,103  | 7.90       | 6.53              | 24.29          | 61.28         | 0.00       |  |  |  |  |  |  |
| Housing Units by Geography                   | 18,924  | 13.00      | 6.70              | 23.62          | 56.68         | 0.00       |  |  |  |  |  |  |
| Owner-Occupied Housing by Geography          | 9,730   | 2.66       | 3.23              | 21.54          | 72.57         | 0.00       |  |  |  |  |  |  |
| Occupied Rental Units by Geography           | 5,762   | 25.18      | 13.90             | 21.66          | 39.26         | 0.00       |  |  |  |  |  |  |
| Vacant Units by Geography                    | 3,432   | 21.85      | 4.46              | 32.81          | 40.88         | 0.00       |  |  |  |  |  |  |
| Businesses by Geography                      | 1,346   | 6.02       | 18.50             | 31.72          | 43.76         | 0.00       |  |  |  |  |  |  |
| Farms by Geography                           | 155     | 2.58       | 3.23              | 18.71          | 75.48         | 0.00       |  |  |  |  |  |  |
| Family Distribution by Income Level          | 9,046   | 15.86      | 14.11             | 20.63          | 49.40         | 0.00       |  |  |  |  |  |  |
| Household Distribution by Income Level       | 15,492  | 26.14      | 15.68             | 14.94          | 43.24         | 0.00       |  |  |  |  |  |  |
| Unemployment rate (%)                        | 4.26    | 5.83       | 8.04              | 3.47           | 4.00          | 0.00       |  |  |  |  |  |  |
| Households Below Poverty Level (%)           | 21.98   | 58.42      | 35.07             | 21.80          | 13.79         | 0.00       |  |  |  |  |  |  |
| Median Family Income (Non-MSAs - KY)         |         | \$53,778   |                   | Median         | Housing Value | \$125,800  |  |  |  |  |  |  |
| Median Family Income (Non-MSAs - KY) for 2   | 024     | \$66,100   |                   | \$744          |               |            |  |  |  |  |  |  |
|  |         |            |                   | Families Below | Poverty Level | 12.33      |  |  |  |  |  |  |

FFIEC File - 2024 Census

2024 Dun & Bradstreet SBSF Demographics

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification

## Scope of Evaluation in Kentucky

A full-scope review was performed on the bank's performance in Calloway County, Kentucky. Please refer to *Appendix A: Scope of Examination*, for a description of the AA and loan products reviewed. For the assessment of TMB's performance at meeting the credit needs of the AA, equal weight was placed on home mortgage loans and small business loans. More consideration was given to the bank's distribution of loans to borrowers of different income levels and businesses of different sizes than to geographic distribution performance. This consideration was due to the AA only having one low-income and one moderate-income census tracks.

## **Conclusions in Respect to Performance Tests in Kentucky**

## **Lending Test**

The bank's performance under the lending test in Kentucky is **Satisfactory.** 

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

The bank exhibits excellent geographic distribution of loans in Kentucky.

#### Home Mortgage Loans

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

TMB's lending reflects excellent dispersion of home mortgage loans across geographies in the bank's AA. Management originated 12.4 percent of loans in low-income CTs, significantly above both demographic and aggregate comparators, and 2.8 percent of loans in moderate-income CTs slightly lower than both the demographic and aggregate comparators.

#### Small Loans to Businesses

Refer to Table Q in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

TMB's lending reflects reasonable dispersion of small loans to businesses by income level of the geographies. Management originated 8.0 percent of loans in low-income CT, above both the demographic and aggregate comparators, and 16.8 percent of loans in the moderate-income CT, slightly below the demographic, but above the aggregate comparator.

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

The bank exhibits reasonable 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: Tables of Performance Data* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's distribution of loans to borrowers of different income levels was reasonable. Management originated 8.4 percent of loans in low-income CTs, below the demographic comparator, but above the aggregate lending performance. Management originated 14.6 percent of loans in moderate-income CTs, in line with the demographic and aggregate comparators.

#### Small Loans to Businesses

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

The bank's lending to businesses of different sizes is excellent. Management originated 100.0 percent of its loans to businesses with annual gross revenues of less than \$1.0 million.

#### **Responses to Complaints**

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

## **Community Development Test**

The bank's performance under the community development test in the state of Kentucky is **Satisfactory**.

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

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state of Kentucky through CD qualified investments and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

#### **Number and Amount of Qualified Investments**

| Qualified Invest                       | Qualified Investments |            |   |           |    |         |           |       |               |           |  |  |
|--|-----------------------|------------|---|-----------|----|---------|-----------|-------|---------------|-----------|--|--|
|  | Prio                  | or Period* |   | Current   |    | ,       | Unfunded  |       |               |           |  |  |
| Assessment                             |                       |            |   | Period    |    |         |           |       | Commitments** |           |  |  |
| Area                                   | #                     | \$(000's)  | # | \$(000's) | #  | % of    | \$(000's) | % of  | #             | \$(000's) |  |  |
|  |                       |            |   |           |    | Total # |           | Total |               |           |  |  |
|  |                       |            |   |           |    |         |           | \$    |               |           |  |  |
| Non-MSA AA                             | 1                     | 455        | 0 | 0         | 1  | 7.1     | 455       | 11.9  | 0             | 0         |  |  |
| Broader<br>Regional/State<br>wide area | 13                    | 3,366      | 0 | 0         | 13 | 92.9    | 3,366     | 88.1  | 0             | 0         |  |  |

<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

TMB made one qualified investment in its AA totaling \$455,432. The investment was maintained from the prior period, and supported the local public library, which is located in a moderate-income CT. Management also maintained 13 prior period investments totaling \$3.4 million in the broader regional area that also serves the needs of the low- and moderate-income (LMI) population.

In addition to the investments noted above, the bank made \$331,486 in donations to 46 qualified community organizations and non-profit organizations in the local area. These included

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

donations made to Calloway County Schools; Murray Calloway County Parks; United Way; HOPE of Calloway County; Neartown, Inc.; and CASA by the Lakes.

#### **Extent to Which the Bank Provides Community Development Services**

TMB provides CD services within the AA. During the evaluation period, 66 employees gave 1,007 hours of their time across 24 organizations that serve residents within the AA. TMB employees used their financial skills in service as board members and volunteers for local organizations whose purpose or programs support LMI individuals or families in the AA and beyond. Hours were donated to the Junior Achievement program, which promotes financial literacy training, serving students in areas where more than half of the students qualify for free or reduced-price lunches, live in substitute care, or whose families receive public aid. Services also performed at the Reality Store, which teaches financial literacy training to local students. Employees also served on the Leadership Tomorrow program of the Community Education Advisory Council, which provides industry training to students within Calloway County.

## **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 metropolitan and nonmetropolitan areas 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:             | January 1, 2022 to December | 31, 2024                                |  |  |  |  |  |  |  |  |  |
|-----------------------------------|-----------------------------|---|--|--|--|--|--|--|--|--|--|
| Bank Products Reviewed:           | Home mortgage and small bus | siness loans.                           |  |  |  |  |  |  |  |  |  |
|                                   | Community development loan  | s, qualified investments, and community |  |  |  |  |  |  |  |  |  |
|                                   | development services        | development services                    |  |  |  |  |  |  |  |  |  |
| Affiliate(s)                      | Affiliate Relationship      | Products Reviewed                       |  |  |  |  |  |  |  |  |  |
| N/A                               |                             |   |  |  |  |  |  |  |  |  |  |
| List of Assessment Areas and Type | ype of Examination          |   |  |  |  |  |  |  |  |  |  |
| Rating and Assessment Areas       | Type of Exam                | Other Information                       |  |  |  |  |  |  |  |  |  |
| Kentucky                          | Full-scope Calloway County  |   |  |  |  |  |  |  |  |  |  |

# **Appendix B: Summary of MMSA and State Ratings**

|   | RATINGS (BANK NAME) |              |              |  |  |  |  |  |  |  |  |  |
|---|---------------------|--------------|--------------|--|--|--|--|--|--|--|--|--|
| Lending TestCD TestOverall Bank/State/Overall Bank:Rating*RatingMultistate Rating |                     |              |              |  |  |  |  |  |  |  |  |  |
| The Murray Bank   | Satisfactory        | Satisfactory | Satisfactory |  |  |  |  |  |  |  |  |  |
| MMSA or State:  |                     |              |              |  |  |  |  |  |  |  |  |  |
| Kentucky  | Satisfactory        | Satisfactory | Satisfactory |  |  |  |  |  |  |  |  |  |

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating

## **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 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 arrogate 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.

The total loan amount presented in the tables for each assessment may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table O:<br>Geograp |  | sessr | nent          | Area l   | Distr              | ibution   | of Hom   | e Mo               | ortgage   | Loans b  | y In               | come Ca   | ategory  | of th              | e         |  | 2022               | - 2024    |
|---------------------|--|-------|---------------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|
|                     | Total Home Low-Income Tracts Moderate-Income Tracts Middle-Income Tracts Upper-Income Tracts  Mortgage Loans |       |               |  |                    |           |  |                    |           |  |                    | racts     | Not Available-Income Tracts                    |                    |           |  |                    |           |
|                     | #  | \$    | % of<br>Total | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate |
| Calloway<br>County  | 20   | 2,121 | 100.0         | 2.7  | 12.4               | 3.0       | 3.2  | 2.8                | 4.7       | 21.5   | 13.1               | 23.0      | 72.6   | 71.7               | 69.4      | 0.0  | 0.0                | 0.0       |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| Table P<br>Borrow  |  | sses  | smer          | ıt Area          | Dist               | ributio   | n of Ho          | ome M              | ortgage   | Loans            | by In              | come C    | ategor           | y of th            | e         |                  | 2022               | - 2024    |
|--------------------|--|-------|---------------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|
|                    | Total Home Low-Income Borrowers Moderate-Income Borrowers Middle-Income Borrowers Upper-Income Borrowers |       |               |                  |                    |           |                  |                    |           |                  |                    |           | Not Availa       | Borrowers          |           |                  |                    |           |
|                    | #  | \$    | % of<br>Total | % of<br>Families | %<br>Bank<br>Loans | Aggregate |
| Calloway<br>County | 20   | 2,121 | 100.0         | 15.9             | 8.4                | 4.4       | 14.1             | 14.6               | 14.1      | 20.6             | 37.0               | 21.9      | 49.4             | 40.0               | 41.4      | 0.0              | 0.0                | 18.3      |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| Table Q: A   |    |  | ent . | Area D | istribu | tion of         | f Loans            | to Si                | mall B       | usiness            | es by               | Incon           | ne Cate            | gory                            | of   | 2022-2024 |     |     |
|--|----|--|-------|--------|---------|-----------------|--------------------|----------------------|--------------|--------------------|---------------------|-----------------|--------------------|---------------------------------|------|-----------|-----|-----|
| Total Loans to Small Businesses  Assessment  Total Loans to Small Low-Income Tracts  Moderate-Income Tracts  Middle Tracts |    |  |       |        |         |                 |                    | Middle-Income Tracts |              |                    | Upper-Income Tracts |                 |                    | Not Available- Income<br>Tracts |      |           |     |     |
| Area:  | #  | # \$ % of Total Businesses % Bank Loans Aggregate % Bank Loans Aggregate |       |        |         | %<br>Businesses | %<br>Bank<br>Loans | Aggregate            | % Businesses | %<br>Bank<br>Loans | Aggregate           | %<br>Businesses | %<br>Bank<br>Loans | Aggregate                       |      |           |     |     |
| Calloway County  | 20 | 3,050  | 100.0 | 6.0    | 8.0     | 7.5             | 18.5               | 16.8                 | 13.0         | 31.7               | 69.2                | 26.4            | 43.8               | 6.0                             | 53.1 | 0.0       | 0.0 | 0.0 |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| Table R: As<br>Annual Rev       |    |       | Area          | Distribution      | of Loans     | to Small        | Businesse | s by Gross             | S                            |  | 2022 - 2024  |  |
|---------------------------------|----|-------|---------------|-------------------|--------------|-----------------|-----------|------------------------|------------------------------|--|--------------|--|
| Total Loans to Small Businesses |    |       |               |                   | Businesses w | rith Revenues < | <= 1MM    | Businesses with<br>1MI |                              | Businesses with Revenues Not Available |              |  |
| Assessment Area:                | #  | \$    | % of<br>Total | Overall<br>Market | % Businesses | % Bank<br>Loans | Aggregate | % Businesses           | % Businesses % Bank<br>Loans |  | % Bank Loans |  |
| Calloway County                 | 20 | 3,050 | 100.0         | 1,271             | 79.0         | 100.0           | 62.9      | 10.4                   | 0.0                          | 10.7                                   | 0.0          |  |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.