



PUBLIC DISCLOSURE

July 22, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Classic Bank, National Association
Charter Number 13731

102 N. Houston
Cameron, TX 76520

Office of the Comptroller of the Currency

225 E John Carpenter Fwy
Irving, TX 75062

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.

Table of Contents

Overall CRA Rating.....2
Description of Institution.....3
Scope of the Evaluation.....4
Discriminatory or Other Illegal Credit Practices Review.....5
State Rating.....6
 State of Texas.....6
Community Development Test17
Appendix A: Scope of Examination.....A-1
Appendix B: Summary of MMSA and State Ratings.....B-1
Appendix C: Definitions and Common Abbreviations.....C-1
Appendix D: Tables of Performance Data.....D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are inside its assessment areas (AAs).
- The bank exhibits reasonable geographic distribution of home mortgage loans, small loans to businesses, and small loans to farms.
- The bank exhibits reasonable borrower distribution of small loans to businesses, and small loans to farms.
- The bank exhibits reasonable responsiveness to community development (CD) needs, considering the bank's capacity and the need and availability of CD opportunities in the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is more than reasonable.

The bank's quarterly average LTD ratio calculated on a bank-wide basis for the 12-quarter evaluation period was 89.7 percent. Over the same timeframe, the LTD ratio ranged from a low of 85.7 percent to a high of 92.4 percent. The bank's average quarterly ratio has increased from the 86.3 percent reported during the prior evaluation period.

The bank's average LTD ratio ranked the second highest of nine similarly situated institutions with total assets ranging from \$48 million to \$1 Million. The overall average LTD of the bank's peer group is 60.6 percent, with an average low of 16.6 percent to a high of 90.2 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment areas (AAs).

The bank originated and purchased 68.1 percent of its total loans by number and 60.0 percent by dollar volume inside the bank's AAs 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.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	A#	%	#	%		\$	%	\$	%	
Home Mortgage	297	68.9	134	31.1	431	\$88,910	58.6	62,828	41.4	\$151,738
Small Business	36	60.0	24	40.0	60	\$7,497	64.3	\$4,169	35.7	\$11,666
Small Farm	42	70.0	18	30.0	60	\$13,012	67.7	\$6,212	32.3	\$19,224
Total	375	68.1	176	31.9	551	\$109,419	60.0	\$73,209	40.0	\$182,628

Source: Bank Data
Due to rounding, totals may not equal 100.0%
Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.

Description of Institution

Classic Bank, National Association (Classic) is a minority-owned intrastate bank chartered in 1889, and headquartered in Cameron, Texas. The bank is wholly owned by Cameron Financial Corporation, which is a single bank holding company. The bank is a single-state institution and does not have affiliates or subsidiaries. There were no merger or acquisition activities during the review period.

As of December 31, 2023, Classic had total assets of \$720 million, total deposits of \$633 million, and tier 1 capital of \$61.6 million. Total loans were \$584.5 million, which represented 81.2 percent of total assets. The loan portfolio consisted of commercial real estate loans totaling \$197.4 million or 33.8 percent of total loans, residential real estate loans totaling \$191.8 million or 32.8 percent of total loans, farm loans totaling \$168.8 or 28.4 percent. The remaining 5.0 percent of loans is comprised of consumer and other loan types.

Classic's main office is located 75 miles northeast of Austin, Texas with a standalone drive-through facility located a few blocks from the main office. In addition to the main office, the bank has a network of seven branches in the cities of Bastrop (Bastrop County), Giddings (Lee County), Liberty Hill (Williamson County), Rockdale (Milam County), Thorndale (Milam County), and Rosebud, Texas (Falls County). The bank also operates a total of six automated teller machines (ATMs) with 24-hour access and drive-through banking services. Alternative delivery channels include 24 hour "Bank-By-Phone," online banking with bill pay, mobile banking with remote check deposit, online loan application acceptance, and four ATMs with deposit-taking capabilities in the cities of Cameron, Rosebud, Rockdale, and Giddings. In 2023, the Liberty Hill and Bastrop ATMs began accepting deposits as well. Also that year, the bank opened a branch in Milam County located in an upper-income census tract.

Classic is a full-service lender offering traditional and digital banking products and services. This includes long-term fixed rate residential mortgages, small business and agricultural loans, and free reward and cash-back checking account products. Until August 2023, Classic offered a "SafeLink" checking account that had no minimum balance requirement, no overdraft privileges, and a monthly service charge. These checking accounts were converted to Classic Free Checking accounts in September 2023.

Classic has three AAs. We combined Bastrop County and Williamson County into the Bastrop and Williamson Counties AA because both counties are in the Austin-Round Rock-Georgetown Metropolitan Statistical Area (MSA). The AA includes all census tracts in each county. We combined Lee County and Milam County into the Lee and Milam Counties AA, because these counties are adjacent and not included in an MSA. The Falls County AA includes seven census tracts and is part of the Waco MSA. We performed full-scope reviews for the Bastrop and Williamson Counties AA and the Lee and Milam Counties AA and a limited scope review for the Falls County AA.

The main office and branches have employees who speak Spanish. In addition, customers can readily access the automated call number to update internet banking passwords or report lost or stolen debit cards. ATM services are available in English and Spanish.

There is significant competition from other financial institutions, particularly among the AAs within an MSA. The June 30, 2023, Federal Deposit Insurance Corporation data showed that the bank had a total deposit market share of 3.8 percent across all three AAs.

In response to the Coronavirus Aid, Relief, and Economic Security Act or CARES Act established in 2020, Classic participated in the Small Business Administrations' Paycheck Protection Program (PPP). These loans were designed to provide a direct incentive for small businesses to keep their workers on payroll during the COVID pandemic. The bank originated 664 PPP loans totaling \$10.5 million in 2021.

Based on the financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit Classic's ability to help meet credit needs in its AAs. The prior performance evaluation dated July 6, 2021, assigned an overall "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the intermediate small bank procedures, which includes a lending test and a CD test. The lending test evaluates the bank's record of meeting the credit needs of its AAs through its primary lending products in home mortgage, small loans to businesses, and farmland and agricultural lending. The CD test evaluates the bank's responsiveness to CD needs in its AAs through CD lending, qualified investments, and services.

The evaluation period for both the lending and CD test was January 1, 2021, through December 31, 2023.

Due to census data changes, we analyzed data in two periods. We evaluated 2021 based on 2015 American Community Survey (ACS) census data, and we evaluated 2022 and 2023 combined based on 2020 US census data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be

evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is based on performance in the State of Texas. The state rating is based on performance in all bank AAs with the most weight placed on performance in the full-scope AAs. We placed more weight on the home mortgage and small business activities, as Classic originated a significant number and dollar volume of these loans during the evaluation period. Refer to the “Scope” section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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 Texas: Satisfactory

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank demonstrated reasonable geographic distribution of home mortgage loans, small loans to businesses, and small loans to farms.
- The bank exhibited reasonable borrower distribution of small loans to farms and small loans to businesses.
- The bank exhibited reasonable responsiveness to CD needs, considering the bank's capacity and the availability of CD opportunities in the AAs.

Description of Institution's Operations in Texas

Classic operates eight banking centers which includes a network of seven branches and the main office in the state of Texas. Classic's AAs include five counties, with each AA containing at least one branch. We completed full-scope reviews of the Bastrop and Williamson Counties AA and the Lee and Milam Counties AA. We performed a limited-scope review of the Falls County AA.

Bastrop and Williamson Counties AA

Classic had \$93.3 million deposits in the Bastrop and Williamson Counties AA, representing 16.2 percent of bank deposits. The AA has two branches and two ATMs, representing 25 percent of total branches. According to June 30, 2023, FDIC deposit-market share data, there are 40 FDIC-insured institutions operating in the AA. Classic ranked 25th in deposit share, with 0.68 percent. The top three banks with 44 percent of the deposit market share were JPMorgan Chase Bank National Bank (NA), Wells Fargo Bank NA, and Bank of America NA. In addition to FDIC-insured institutions, this area is served by numerous credit unions and mortgage companies.

Demographics

The following tables provide a summary of the demographics, including housing, business, and economic information for the Bastrop and Williamson Counties AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bastrop and Williamson Counties AA						
2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	99	2.0	18.2	51.5	28.3	0.0
Population by Geography	550,540	1.0	16.0	54.1	28.9	0.0
Housing Units by Geography	201,635	1.0	17.2	54.7	27.1	0.0
Owner-Occupied Units by Geography	130,669	0.6	11.8	55.6	32.0	0.0
Occupied Rental Units by Geography	56,578	1.7	27.7	52.8	17.8	0.0
Vacant Units by Geography	14,388	1.5	24.1	54.5	19.8	0.0
Businesses by Geography	63,937	1.2	13.3	54.5	31.0	0.0
Farms by Geography	1,712	0.8	15.4	60.5	23.3	0.0
Family Distribution by Income Level	135,735	17.7	17.6	22.5	42.2	0.0
Household Distribution by Income Level	187,247	18.2	16.0	19.3	46.6	0.0
Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$187,560
			Median Gross Rent			\$1,053
			Families Below Poverty Level			6.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the weighted average median family income for the Bastrop and Williamson Counties AA was \$78,997. Therefore, low-income families earned less than \$39,499, and moderate-income families earned less than \$63,198. The median housing value in the AA was \$187,560. One method to determine housing affordability, assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum monthly mortgage payment was \$987 for a low-income borrower and \$1,580 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,007. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bastrop and Williamson Counties AA						
2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	1.9	25.0	46.8	26.3	0.0
Population by Geography	706,233	1.4	21.6	48.1	29.0	0.0
Housing Units by Geography	229,496	1.8	23.9	49.3	24.9	0.0
Owner-Occupied Units by Geography	148,797	0.6	18.0	50.1	31.3	0.0
Occupied Rental Units by Geography	65,489	4.2	34.4	48.2	13.2	0.0
Vacant Units by Geography	15,210	3.5	36.7	47.0	12.8	0.0
Businesses by Geography	131,582	1.9	13.9	62.9	21.4	0.0
Farms by Geography	3,051	0.8	19.1	60.0	20.2	0.0
Family Distribution by Income Level	155,300	18.7	18.0	23.0	40.3	0.0
Household Distribution by Income Level	214,286	18.8	16.6	19.3	45.2	0.0
Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA		\$100,215	Median Housing Value			\$269,500
			Median Gross Rent			\$1,352
			Families Below Poverty Level			4.7%
Source: 2020 U.S. Census and 2023 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.						

Based on the 2020 US Census Data, the OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income was \$100,215. Therefore, low-income families earned less than \$50,108, and moderate-income families earned less than \$80,172. The median housing value in the AA was \$269,500. One method to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,253 for a low-income borrower and \$2,004 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,447. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Bastrop and Williamson Counties AA, the overall household poverty level was 4.7 percent as of the 2020 census data, which had declined from 6.0 percent as of the 2015 data.

Economic Data

The Bastrop and Williamson Counties AA is included in the greater Austin-Round Rock-Georgetown, TX MSA (Austin-Round Rock). According to Moody's Analytics as of May 2024, data show that total

job gains in Austin-Round Rock have been steady in recent months, matching the national pace but below the metro area's customary performance. Growth in private-sector payrolls has decelerated; in particular, core professional services have been flat over the past year. In contrast, local government hiring has risen strongly, as higher-paying job opportunities in the private sector have waned. The unemployment rate has been flat at 3.3%, and the labor force has continued to rise despite the slower hiring. In the housing market, prices are still trending down, but new permits are rising, albeit slowly.

Community Contacts

To help identify needs and opportunities in the AA, the OCC reviewed three recent regulatory agency contacts with organizations that focus on economic development, community service, and housing programs in the AA. The contacts stated the economy continues to grow, and the primary need in the AA is affordable housing. Local banks are active in the communities and offer various special purpose programs.

Lee and Milam Counties AA

Classic had \$407.6 million in deposits in the Lee and Milam Counties AA, representing 70.6 percent of the bank's total deposits as of June 30, 2023. As of December 31, 2023, the bank operated five branches (including the main bank) and three ATMs, all of which were deposit taking. AA branches represented 62.5 percent of total branches. According to FDIC deposit-market share data, as of June 30, 2023, there were six FDIC-insured institutions operating 19 branches in the AA. Classic ranked first in deposit share, with 31.9 percent. Including Classic, the top three banks by deposit market share were Citizens National Bank and First National Bank of Giddings with 73.5 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and money service businesses.

Demographics

The following tables provide a summary of the demographics, including housing, business, and economic information for the Bastrop and Williamson AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lee and Milam Counties						
2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	9.1	54.5	36.4	0.0
Population by Geography	41,008	0.0	8.0	58.6	33.4	0.0
Housing Units by Geography	18,893	0.0	8.5	56.9	34.6	0.0
Owner-Occupied Units by Geography	10,620	0.0	7.0	55.2	37.9	0.0
Occupied Rental Units by Geography	4,722	0.0	10.9	61.5	27.6	0.0
Vacant Units by Geography	3,551	0.0	9.8	56.2	34.0	0.0
Businesses by Geography	2,960	0.0	10.1	59.2	30.7	0.0
Farms by Geography	247	0.0	6.1	57.5	36.4	0.0
Family Distribution by Income Level	10,303	18.5	16.5	19.1	45.9	0.0
Household Distribution by Income Level	15,342	24.8	14.9	14.9	45.4	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$95,081
			Median Gross Rent			\$670
			Families Below Poverty Level			12.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the weighted average median family income for the Lee and Milam Counties AA was \$52,198. Therefore, low-income families earned less than \$26,099, and moderate-income families earned less than \$41,758. The median housing value in the AA was \$95,081. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$652 for a low-income borrower and \$1,044 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$510.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lee and Milam Counties						
2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	72.7	9.1	0.0
Population by Geography	42,232	0.0	19.7	73.2	7.2	0.0
Housing Units by Geography	19,276	0.0	19.2	73.8	6.9	0.0
Owner-Occupied Units by Geography	11,930	0.0	16.2	75.9	7.9	0.0
Occupied Rental Units by Geography	3,697	0.0	26.7	66.0	7.3	0.0
Vacant Units by Geography	3,649	0.0	21.5	75.0	3.5	0.0
Businesses by Geography	4,283	0.0	23.2	69.6	7.2	0.0
Farms by Geography	327	0.0	22.0	68.2	9.8	0.0
Family Distribution by Income Level	11,004	20.2	18.6	20.3	40.9	0.0
Household Distribution by Income Level	15,627	23.9	15.8	17.0	43.3	0.0
Median Family Income Non-MSAs - TX		\$61,785	Median Housing Value			\$136,071
			Median Gross Rent			\$760
			Families Below Poverty Level			11.8%
Source: 2020 U.S. Census and 2023 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.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2020 US Census Data, the weighted average median family income for the Bastrop and Williamson Counties AA was \$61,785. Therefore, low-income families earned less than \$30,893, and moderate-income families earned less than \$49,428. The median housing value in the AA was \$136,071. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$772 for a low-income borrower and \$1,236 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$730.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Lee and Milam Counties AA, the overall household poverty level was 11.8 percent as of the 2020 census data, which had declined from 12.6 percent as of the 2015 data.

Economic Data

The Lee and Milam Counties AA is adjacent to the Waco MSA. According to Moody's Analytics as of May 2024, data show that the economy is trending in the right direction. Job growth has slowed after an impressive end to 2023 but continues to track well ahead of the state on a year-ago basis. Local

government and professional and business services have posted strong job gains, while manufacturing and retail trade have been weaker. The jobless rate is near a cycle low even as the labor force expands, suggesting new entrants are being absorbed into the workforce. House prices are increasing, consistent to the appreciation taking place across most of Texas.

Community Contacts

To help identify needs and opportunities in the AA, the OCC reviewed three recent regulatory agency contacts with organizations that focus on economic development, community service, and housing programs in the AA. The contacts stated the economy continues to grow, and the primary need in the AA is affordable housing. There is also a need for single family mortgages, consumer loans, and small business loans. Local banks are active in the communities and offer various special purpose programs.

Scope of Evaluation in Texas

We selected the Bastrop and Williamson Counties AA and the Lee and Milam Counties AA for full-scope reviews because they accounted for a majority of originations and deposits during the evaluation period. We performed a limited-scope review of the Falls County AA because of the low market share and lending activity. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full- and limited-scope reviews, the bank's lending performance in the state of Texas is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state. Our analysis considered the following performance context factors when evaluating geographic distribution across the bank's full scope AAs:

- For the Bastrop and Williamson Counties AA, we placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.
- We did not review small loans to farms in the Bastrop and Williamson Counties AA as there were not enough farm loans in this AA to conduct a meaningful analysis in the 2021 and 2022-2023 period and management had a greater focus on agricultural lending within the other remaining AAs.

- The Lee and Milam Counties AA did not have any low-income geographies during the evaluation period, so all weight was placed on the bank's performance in the moderate-income geographies.

Home Mortgage Loans

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.

Bastrop and Williamson Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

2021

The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied homes in those geographies as well as the aggregate distribution of loans. Although the bank did not lend in low-income geographies, opportunities were limited as less than one percent of owner-occupied housing units are in these geographies and the aggregate distribution of lending in low-income geographies was negligible at 0.2 percent.

2022-2023

The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied homes in those geographies as well as the aggregate distribution of loans. The bank did not lend in low-income geographies. However, we acknowledge the limited opportunities within low-income geographies in this AA given that less than one percent of owner-occupied housing units were situated in these geographies and the aggregate distribution of lending was negligible at 0.4 percent.

Lee and Milam Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is reasonable.

2021

The bank's percentage of home mortgages in moderate-income geographies was below both the percentage of owner-occupied housing units and the aggregate lending distribution.

2022-2023

The bank's percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied homes in those geographies as well as the aggregate distribution of loans.

Small Loans to Businesses

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.

Bastrop and Williamson Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was reasonable.

2021

The bank did not originate any small loans to businesses located in low-income geographies, which was below the percentage of businesses in those geographies and the aggregate distribution of lending. However, the bank's percentage of small loans to businesses in moderate-income census tracts exceeded the percentage of businesses in those geographies and the aggregate distribution of lending.

2022-2023

The bank did not originate any small loans to businesses located in low-income geographies, which was below the percentage of businesses in those geographies and the aggregate distribution of lending. However, the bank's percentage of small loans to businesses in moderate-income census tracts exceeded the percentage of businesses in those geographies and the aggregate distribution of lending.

Lee and Milam Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was reasonable.

2021

The bank did not originate any small loans to businesses located in moderate-income geographies, which compares poorly to the percentage of small businesses in those geographies and the aggregate distribution of lending.

2022-2023

The bank's percentage of loans in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of lending.

Small Loans to Farms

Refer to Table S 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 farms.

Lee and Milam Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was reasonable.

2021

The bank's percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies as well as the aggregate distribution of lending.

2022-2023

The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies, but near to the aggregate distribution of lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Our analysis considered the following performance context factors when evaluating income distribution across the bank's full-scope AAs:

- We acknowledged emerging home loan affordability issues within the bank's markets due to rising mortgage interest rates and rising housing costs. These considerations coupled with the intensity of competition from national and super-regional financial institutions within the Bastrop and Williamson markets were all taken into account when assessing the bank's distribution of home lending performance and its impact on the overall conclusions for distribution of lending by income level of the borrower.
- We did not review small loans to farms for the Bastrop and Williamson Counties AA. There were not enough small loans to farm in this market for the 2021 and 2022-2023 periods to conduct a meaningful analysis.

Home Mortgage Loans

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.

Bastrop and Williamson Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is poor.

2021

The bank's percentage of mortgage lending to low-income borrowers was below the percentage of low-income families in the AA but exceeded the aggregate distribution of loans. The percentage of mortgage lending to moderate-income borrowers was below the percentage of moderate-income families and somewhat below the aggregate distribution of loans.

2022-2023

The bank's percentage of mortgage lending to low-income borrowers was below both the percentage of low-income families and the aggregate lending performance. Similarly, the bank's percentage of mortgage lending to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate lending performance.

Lee and Milam Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans is poor.

2021

The bank's percentage of home mortgage lending to low-income borrowers was significantly below the percentage of low-income families but approximated the aggregate distribution of loans. The percentage of moderate-income borrowers was below the percentage of moderate-income families in the AA. The bank's home lending to moderate-income borrowers was somewhat below the aggregate distribution of lending.

2022-2023

The bank did not originate any home mortgage loans to low-income borrowers, which compared poorly to the percentage of low-income families in the AA and the aggregate lending performance. Also, the bank's percentage of home mortgage lending to moderate-income borrowers was below the percentage of moderate-income families and the aggregate lending performance.

Small Loans to Businesses

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.

Bastrop and Williamson Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses is excellent.

2021

The percentage of the bank's small loans to businesses with revenue less than or equal to \$1 million was near to the percentage of businesses identified as having revenue less than or equal to \$1 million and exceeded the aggregate lending to these businesses.

2022-2023

The percentage of the bank's small loans to businesses with revenues less than or equal to \$1 million was somewhat below the percentage of businesses identified as having revenue less than or equal to \$1 million but exceeded the aggregate lending to these businesses.

Lee and Milam Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses is excellent.

2021

The percentage of the bank's small loans to businesses with revenue less than or equal to \$1 million was near to the percentage of businesses identified as having revenue less than or equal to \$1 million and exceeded the aggregate lending to these businesses.

2022-2023

The percentage of the bank's small loans to businesses with revenues less than or equal to \$1 million was somewhat below the percentage of businesses identified as having revenue less than or equal to \$1 million but exceeded the aggregate lending to these businesses.

Small Loans to Farms

Refer to Table T 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 farms.

Lee and Milam Counties AA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses is excellent.

2021

The bank's small loans to farms with revenues less than or equal to \$1 million was somewhat below the percentage of farms identified as having revenues less than or equal to \$1 million in the AA but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The bank's loans to farms with revenues less than or equal to \$1 million was near to the percentage of farms identified as having revenues less than or equal to \$1 million and exceeded the aggregate percentage of all reporting lenders.

Responses to Complaints

Classic did not receive any complaints related to CRA or fair lending performance during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on limited-scope review, the bank's performance under the Lending Test in the Falls County AA is consistent with the bank's overall performance under the Lending Test in the full-scope AAs.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Texas is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state of Texas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

Number and Amount of Community Development Loans

Classic had an adequate level of CD lending in the AA. The bank made three CD loans totaling nearly \$5.5 million, which represented 8.9 percent of the tier 1 capital. CD loans primarily supported local revitalization and stabilization and economic development efforts. By dollar volume, 56.5 percent funded revitalization and stabilization efforts and 43.5 percent benefited economic development initiatives.

Examples of CD loans include:

- One loan totaling \$135,000 supporting economic development in Falls County, Texas.
- One loan totaling \$2 million to renovate a local health facility that provides services to low- and moderate-income individuals in Milam County, Texas.
- One loan totaling \$3.2 million to fund infrastructure improvements benefiting a moderate-income tract in Giddings, Texas.

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Bastrop and Williamson Counties AA	0	0.0	0	0.0
Lee and Milam Counties AA	3	75.0	5,350	97.5
Falls County AA	1	25.0	135	2.5
Total	4	100.0	5,485	100.0
Source: Bank Data 01/01/2021 to 12/31/2023				

Additionally, Classic was responsive to community credit needs through the origination of PPP loans in 2021. This included 369 loans totaling \$6.1 million in the Lee and Milam Counties AA, 56 loans totaling \$834,263 in the Bastrop and Williamson Counties AA, and 111 loans totaling \$1.6 million in the Falls County AA.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Bastrop and Williamson Counties AA	0.0	0.0	18	18	18	23.7	18	28.1	0.0	0.0
Lee and Milam Counties AA	0.0	0.0	56	43	56	73.7	43	67.2	0.0	0.0
Falls County AA	0.0	0.0	2	3	2	2.6	3	4.7	0.0	0.0
Total	0.0	0.0	76	64	76	100.0	64	100.0	0.0	0.0

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

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

Bastrop and Williamson Counties AA

CD investments and donations support economic development and community services to low- and moderate-income individuals and families. The bank made 18 donations and investments totaling nearly \$18,000 during the evaluation period. This is an improvement compared to the previous examination total of \$7,000.

- A donation of \$3,000 was made to an organization committed to the preservation based economic development and community revitalization.

- Donations totaling \$2,600 were made to an organization that supports low- and moderate-income children and families involved in the child welfare system.
- Donations of nearly \$5,300 supported programs that benefit low- and moderate-income families.

Milam and Lee Counties AA

CD activities support economic development and community services to low- and moderate-income individuals and families. The bank made 56 donations totaling nearly \$43,000 during the evaluation period. This is an improvement compared to the previous examination total of \$17,000.

- Donations totaling \$17,500 were made for the purpose of community revitalization in a moderate-income census tract in Lee County.
- Donations totaling \$2,940 were made to organizations that supports low- and moderate-income children and families in Lee County.
- Donations totaling \$2,000 promoted economic development in a moderate-income census tract in Milam County.
- Donations totaling nearly \$7,000 were made to organizations supporting low- and moderate-income children and families in Milam County.

Extent to Which the Bank Provides Community Development Services

The bank's overall level of CD services demonstrates adequate responsiveness to local CD needs.

Bastrop and Williamson Counties AA

During the evaluation period, three employees provided 91 hours of service to six organizations. Qualified services were primarily for community service purposes with the majority benefiting an organization that supports children from low- and moderate-income families.

Lee and Milam Counties AA

During the evaluation period, eight employees provided 1,316 hours of service to 13 organizations. Employees served as board members for the various organizations. The services provided ranged from economic development and community service. Examples of services include community service to food pantries, serving as members to programs awarding scholarships to low- and moderate-income students, and serving as board members for organizations that support low- and moderate-income individuals. The bank partners with local economic development corporations and activities include providing workforce development and technical assistance support for small businesses.

Other Community Development Services

Additionally, the bank participates in the following community development service activities that have special features that are of particular benefit to low- and moderate-income individuals:

The bank participates in the Interest on Lawyers' Trust Accounts (IOLTA) Texas Access to Justice Foundation ("Foundation"), which is a joint program of the Texas State Bar Association. The IOLTA Foundation consists of financial institutions that pay premium rates on IOLTA accounts. Revenue generated from the IOLTA Foundation program is used to make grants to nonprofit organizations providing legal services to low-income persons in Texas. Between the period of January 1, 2021,

through December 31, 2023, the bank held 11 IOLTA accounts and remitted \$1,029.94 IOLTA funds to the Foundation.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Falls County AA is weaker than the bank's overall performance under the CD Test in the full scope areas. The reason for the weaker performance is due to the volume of CD loans, investments, and services. However, this performance had a neutral impact on the overall rating due to the lower volume of bank deposits in this market.

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 MSA(s) and non-MSA(s) 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:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage, small business, small farm loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Texas		
Bastrop and Williamson Counties AA	Full-scope	Part of Austin-Round Rock-Georgetown MSA (12420). Includes all 21 census tracts in Bastrop County and all 135 census tracts in Williamson County.
Lee and Milam Counties AA	Full-scope	Non-MSA; includes all 4 census tracts in Lee County and all 7 census tracts in Milam County.
Falls County AA	Limited-scope	Part of Waco MSA (47380). Includes all 6 census tracts in Falls County.

Appendix B: Summary of MMSA and State Ratings

RATINGS		Classic Bank, NA	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Classic Bank, NA	Satisfactory	Satisfactory	Satisfactory
Texas	Satisfactory	Satisfactory	Satisfactory

(*) 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 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.

The total loan amount presented in the tables for each assessment area 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 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.

The total loan amount presented in the tables for each assessment area 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: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
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
Bastrop and Williamson Counties	30	13,221,319	26.8	61,149	0.6	0.0	0.2	11.8	33.3	6.3	55.6	60.0	55.5	32.0	6.7	38.1	0.0	0.0	0.0
Lee and Milam Counties	66	13,688,499	58.9	1,039	0.0	0.0	0.0	7.0	1.5	4.3	55.2	71.2	55.3	37.9	27.3	40.3	0.0	0.0	0.0
Falls County	16	4,610,876	14.3	300	0.0	0.0	0.0	27.7	0.0	21.7	57.4	56.3	57.7	14.9	43.8	20.7	0.0	0.0	0.0
Total	112	31,520,694	100.0	62,488	0.5	0.0	0.2	11.9	9.8	6.3	55.6	66.1	55.5	32.0	24.1	38.1	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA 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 area 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: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-23	
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		
Bastrop and Williamson Counties	45	19,561,894	24.3	26,346	0.6	0.0	0.4	18.0	33.3	16.8	50.1	46.7	49.3	31.3	20.0	33.5	0.0	0.0	0.0		
Lee and Milam Counties	120	32,714,332	64.9	645	0.0	0.0	0.0	16.2	20.0	17.1	75.9	69.2	75.0	7.9	10.8	7.9	0.0	0.0	0.0		
Falls County	20	5,113,201	10.8	221	27.0	0.0	20.4	18.2	60.0	16.3	39.1	15.0	45.7	15.7	25.0	17.6	0.0	0.0	0.0		
Total	185	57,389,427	100.0	27,212	1.3	0.0	0.5	17.9	27.6	16.8	51.7	57.8	49.9	29.2	14.6	32.8	0.0	0.0	0.0		

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA 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 area 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
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
Bastrop and Williamson Counties	30	13,221,319	26.8	61,149	17.7	6.7	3.4	17.6	10.0	13.6	22.5	20.0	19.6	42.2	46.7	40.9	0.0	16.7	22.4
Lee and Milam Counties	66	13,688,499	58.9	1,039	18.5	1.5	1.6	16.5	7.6	9.7	19.1	19.7	18.6	45.9	65.2	49.0	0.0	6.1	21.1
Falls County	16	4,610,876	14.3	300	24.5	0.0	3.0	20.0	0.0	12.0	19.6	6.3	20.3	35.9	93.8	45.7	0.0	0.0	19.0
Total	112	31,520,694	100.0	62,488	17.9	2.7	3.4	17.6	7.1	13.5	22.2	17.9	19.6	42.3	64.3	41.1	0.0	8.0	22.4

Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA 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 area 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Bastrop and Williamson Counties	45	19,561,894	24.3	26,346	18.7	2.2	3.5	18.0	4.4	14.4	23.1	26.7	22.3	40.3	51.1	33.8	0.0	15.6	26.0	
Lee and Milam Counties	120	32,714,332	64.9	645	20.2	0.0	1.9	18.6	6.7	10.2	20.3	13.3	19.1	40.9	72.5	49.3	0.0	7.5	19.5	
Falls County	20	5,113,201	10.8	221	33.0	0.0	5.4	16.5	10.0	14.0	17.0	30.0	23.1	33.5	60.0	37.1	0.0	0.0	20.4	
Total	185	57,389,427	100.0	27,212	19.1	0.5	3.5	18.0	6.5	14.3	22.7	18.4	22.3	40.2	65.9	34.2	0.0	8.6	25.8	

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA 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 area 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
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
Bastrop and Williamson Counties AA	20	4,262,554	39.2	19,419	1.2	0.0	1.3	13.3	35.0	12.8	54.5	60.0	51.5	31.0	5.0	34.5	0.0	0.0	0.0
Lee and Milam Counties	17	2,382,301	33.3	694	0.0	0.0	0.0	10.1	0.0	6.1	59.2	76.5	59.9	30.7	23.5	34.0	0.0	0.0	0.0
Falls County	14	1,109,471	27.5	215	0.0	0.0	0.0	34.1	28.6	26.5	52.4	64.3	59.1	13.5	7.1	14.4	0.0	0.0	0.0
Total	51	7,754,326	100.0	20,328	1.2	0.0	1.2	13.5	21.5	12.7	54.7	66.7	51.9	30.7	11.8	34.3	0.0	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

The total loan amount presented in the tables for each assessment area 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-23	
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	
Bastrop and Williamson Counties	20	5,554,050	33.3	21,870	1.9	0.0	2.2	13.9	20.0	19.0	62.9	40.0	47.7	21.4	40.0	31.1	0.0	0.0	0.0	
Lee and Milam Counties	20	2,298,982	33.3	772	0.0	0.0	0.0	23.2	20.0	19.4	69.6	75.0	71.5	7.2	5.0	9.1	0.0	0.0	0.0	
Falls County	20	3,612,168	33.3	246	29.9	15.0	29.7	15.6	45.0	14.6	39.3	5.0	42.3	15.1	35.0	13.4	0.0	0.0	0.0	
Total	60	11,465,200	100.0	22,888	2.1	5.0	2.4	14.2	28.3	19.0	62.9	40.0	48.4	20.9	26.7	30.2	0.0	0.0	0.0	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

The total loan amount presented in the tables for each assessment area 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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
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	
Bastrop and Williamson Counties	20	4,262,554	39.2	19,419	91.1	75.0	45.4	2.2	25.0	6.7	0.0	
Lee and Milam Counties	17	2,382,301	33.3	694	84.9	76.5	39.3	3.8	23.5	11.4	0.0	
Falls County	14	1,109,471	27.5	215	83.3	28.6	50.7	3.4	71.4	13.3	0.0	
Total	51	7,754,326	100.0	20,328	90.7	62.7	45.3	2.3	37.3	7.0	0.0	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 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												2022-23
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	
Bastrop and Williamson Counties	20	5,554,050	33.3	21,870	95.1	70.0	49.8	1.1	30.0	3.7	0.0	
Lee and Milam Counties	20	2,298,982	33.3	772	88.9	60.0	47.3	2.7	40.0	8.3	0.0	
Falls County	20	3,612,168	33.3	246	88.9	75.0	51.6	2.1	25.0	9.1	0.0	
Total	60	11,465,200	100.0	22,888	94.9	68.3	49.7	1.2	31.7	3.9	0.0	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

The total loan amount presented in the tables for each assessment area 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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bastrop and Williamson Counties	10	1,861,889	20.0	213	0.8	0.0	0.9	15.4	30.0	29.6	60.5	50.0	58.7	23.3	20.0	10.8	0.0	0.0	0.0
Lee and Milam Counties	20	2,964,324	40.0	97	0.0	0.0	0.0	6.1	10.0	2.1	57.5	75.0	62.9	36.4	15.0	35.1	0.0	0.0	0.0
Falls County	20	5,760,535	40.0	91	0.0	0.0	0.0	7.5	0.0	5.5	74.5	45.0	76.9	17.9	55.0	17.6	0.0	0.0	0.0
Total	50	10,586,748	100.0	401	0.7	0.0	0.5	13.9	10.0	17.5	60.8	58.0	63.8	24.6	32.0	18.2	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 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 area 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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-23	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Bastrop and Williamson Counties	15	1,780,995	28.4	174	0.8	0.0	0.0	19.1	46.7	28.2	60.0	33.3	55.2	20.2	20.0	16.7	0.0	0.0	0.0	
Lee and Milam Counties	19	2,350,542	35.8	86	0.0	0.0	0.0	22.0	15.8	17.4	68.2	73.7	75.6	9.8	10.5	7.0	0.0	0.0	0.0	
Falls County	19	3,219,605	35.8	95	7.6	0.0	7.4	15.3	47.4	23.2	56.9	10.5	56.8	20.1	42.1	12.6	0.0	0.0	0.0	
Total	53	7,351,142	100.0	355	1.0	0.0	2.0	19.2	35.8	24.2	60.6	39.7	60.6	19.2	24.5	13.2	0.0	0.0	0.0	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

The total loan amount presented in the tables for each assessment area 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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bastrop and Williamson Counties	10	1,861,889	20.0	213	97.3	80.0	51.2	1.5	20.0	1.3	0.0
Lee and Milam Counties	20	2,964,324	40.0	97	99.2	75.0	50.5	0.4	25.0	0.4	0.0
Falls County	20	5,760,535	40.0	91	99.1	70.0	28.6	0.0	30.0	0.9	0.0
Total	50	10,586,748	100.0	401	97.6	74.0	45.9	1.3	26.0	1.2	0.0
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-23
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bastrop and Williamson Counties	15	1,780,995	28.4	174	98.2	86.7	55.2	0.9	13.3	0.9	0.0
Lee and Milam Counties	19	2,350,542	35.8	86	98.8	89.5	50.0	0.3	10.5	0.9	0.0
Falls County	19	3,219,605	35.8	95	98.6	78.9	31.6	0.0	15.8	1.4	5.3
Total	53	7,351,142	100.0	355	98.2	84.9	47.6	0.8	13.2	0.9	1.9
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

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