Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

February 9, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Hutchinson
Charter Number: 3180

One North Main Street
Hutchinson, Kansas 67504

Office of the Comptroller of the Currency

2959 North Rock Road, Suite 510
Wichita, Kansas 67226

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.

Contents

Overall CRA Rating

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

The Lending Test is rated: Outstanding.
The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on Outstanding performance in the state of Kansas.
- The Community Development (CD) Test rating is based on Outstanding performance in the state of Kansas.
- A more than reasonable loan-to-deposit (LTD) ratio.
- A majority of the bank's loans were made within its assessment areas (AAs).

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was more than reasonable.

The First National Bank of Hutchinson's (FNB) average quarterly LTD ratio from March 31, 2022, through December 31, 2024, was 88.3 percent. Examiners compared FNB to five similarly situated institutions within or near the bank's AAs with asset sizes ranging from $516.2 million to $6.8 billion. FNB's asset size totaled $1.2 billion and ranked fourth largest in comparison with the five institutions. The other institutions LTD ratios averaged 83 percent and ranged from an average low of 59.4 percent to an average high of 100.4 percent.

Lending in Assessment Area

A majority of the bank's loans were inside its AAs.

The bank originated and purchased 75.2 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										**2022 – 2024**
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000s)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Home Mortgage	502	74.93	168	25.07	670	82,103	51.95	75,943	48.05	158,046
Small Business	72	77.42	21	22.58	93	15,314	52.85	13,661	47.15	28,975
Total	**574**	**75.23**	**189**	**24.77**	**763**	**97,417**	**52.09**	**89,604**	**47.91**	**187,021**

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

Description of Institution

FNB is a single-state financial institution headquartered in Hutchinson, Kansas. As of December 31, 2024, FNB had total assets of $1.2 billion and tier 1 capital of $125.4 million. The bank is a wholly owned subsidiary of First Kansas Bancshares, Inc., also located in Hutchinson, Kansas. The bank has no affiliates requiring consideration for CRA activities.

FNB identifies Reno County, Kansas and Sedgwick County, Kansas as their AAs. Reno County is a non-Metropolitan Statistical Area (MSA), and Sedgwick County is part of the Wichita, KS MSA (#48620). Within the AAs, the bank operates the main office and seven branches. Six branches include drive-up facilities. FNB operates nine automated teller machines (ATMs), with four accepting deposits. The bank did not open or close any branch locations during the evaluation period.

FNB offers many products and services for consumers and businesses. The bank offers commercial, agriculture, mortgage, and consumer lending products. Additionally, the bank offers online and mobile banking services to consumer and commercial customers. The bank's website lists specific information on products and services offered. FNB also serves as a correspondent bank to 34 community banks. During the evaluation period, FNB participated in FHLB's Homeownership Set-aside Program (HSP) which provides first-time homebuyers in Kansas with down payment, closing cost, and purchase-related repair assistance. In 2024, FNB participated in FHLB's Homeownership Possibilities Expanded (HOPE) which is similar to HSP but not limited to first-time homebuyers.

Competition among financial institutions in the AAs is high, especially in Sedgwick County. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Reports as of June 30, 2024, FNB ranked first among 11 institutions with 58.5 percent of deposit market share in Reno County. Within Sedgwick County, FNB's deposit market share represented 0.47 percent and was ranked 23rd among 38 institutions.

There are no known legal, financial, or other factors that may impede the institution's ability to meet the credit needs in its AAs. FNB was rated "Satisfactory" in the last published CRA Public Evaluation dated December 19, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated FNB using the Intermediate Small Bank examination procedures, which included a lending test and a CD test. The lending test evaluated FNB's performance from January 1, 2022, through December 31, 2024. Each AA was evaluated based on its primary lending products. The primary products include small loans to businesses by dollar in both AAs and by number for the Reno County AA and home mortgages by number in the Sedgwick County AA.

The CD test included a review of CD loans, qualified investments and donations, and CD services. The CD evaluation period was January 1, 2022, through December 31, 2024.

To assess FNB's lending performance, examiners sampled 58 business loans originated during the evaluation period for the Reno County AA, and 35 business loans originated during the evaluation period for the Sedgwick County AA. Additionally, examiners performed a review of the bank's Home Mortgage Disclosure Act (HMDA) Loan Application Register for home mortgages originated or purchased in 2022, 2023, and 2024.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable 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 a blend of the state ratings, and where applicable, multistate ratings.

Examiners placed greater weight on the Reno County AA performance given the majority of loans were originated or purchased in this AA and the majority of the bank's deposits were in the Reno County AA.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA 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) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Kansas

CRA rating for the State of Kansas: Outstanding
The Lending Test is rated: Outstanding
The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of small loans to businesses in low- and moderate-income (LMI) geographies and to businesses with revenues of $1 million or less in the Reno County AA is excellent.
- The distribution of home mortgage loans by geographic distribution and by borrower income is reasonable.
- CD loans, investments, and donations in Reno County AA represent excellent responsiveness to community needs.

Description of Institution's Operations in Kansas

The state of Kansas represents FNB's only rating area. FNB delineated two AAs within the state of Kansas, the Reno County AA, which received a full scope review, and the Sedgwick County AA, which received a limited-scope review. FNB operates the main bank, seven branches, and nine ATMs, four of which are deposit-taking, in Kansas. Based on the FDIC Deposit Market Share Report as of June 30, 2024, FNB deposits in Kansas totaled $972.9 million, or 0.98 percent of the market share, and was ranked 21st out of 249 financial institutions operating in Kansas. All AAs meet regulatory requirements and do not arbitrarily exclude LMI geographies.

<u>Reno County AA</u>
The Reno County AA consists of all 17 census tracts in Reno County, Kansas. During the evaluation period, there was one low-, two moderate-, thirteen middle-, and one upper-income census tracts. There are no distressed or underserved census tracts within the Reno County AA. FNB operated the main bank, five branches, and seven ATMs, three of which were deposit-taking. According to the FDIC's deposit data as of June 30, 2024, FNB had the largest deposit market share (58.5 percent) of the 11 financial institutions operating in Reno County. After FNB, the top three financial institutions by deposit market share were Peoples Bank and Trust Company (11.3 percent), RCB Bank (10.7 percent), and First Bank Kansas (3.9 percent).

Top industries in the Reno County AA include agriculture (wheat, corn, milo, and soybeans), salt mining, and manufacturing. Major employers in the Reno County AA include Hutchinson Regional Medical Centers, Dillons Companies, Tyson Prepared Foods, and the public school districts.

The December 31, 2024, unemployment rate for Reno County is 3.4 percent which was below the Kansas unemployment rate of 3.8 percent and national unemployment rate of 4.1 percent, based on data from the U.S. Bureau of Labor Statistics. Examiners evaluated the disparity between the median incomes of families with the AA and the cost of housing. Based on the 2024 weighted average median family income of $80,900, low-income families earned less than $40,450, and moderate-income families earned less than $64,720. 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 affordability monthly mortgage payment was $1,011 for a low-income borrower and $1,618 for a moderate-income borrower. Assuming a 30-year mortgage with a six percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly payment for a home in the AA with a median housing value would be $660. Housing was generally affordable for LMI borrowers in the Reno County AA. However, according to the Federal Housing Finance Agency, home prices increased 17.1 percent in the Reno County AA during the evaluation period.

A 2024 Housing Needs Assessment commissioned by the City of Hutchinson, Reno County, and South Hutchinson identified that over 1,000 new housing units are needed by 2035. The study also found the need to invest in new builds and rehab existing homes, increased housing demand across all income levels, and the need for additional housing options for older adults.

In addition, we considered the poverty level across the AA when evaluating 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 Reno County AA, 8.1 percent of families had incomes below the federal poverty level.

Examiners considered feedback from one community contact as part of this performance evaluation. The interview was performed in August 2024 with a self-supporting, nonprofit, public corporation that serves as the primary administrator of federal housing programs for the state of Kansas. The contact serves the entire state of Kansas with a focus on more rural areas. The contact mentioned they are seeing a better job market, but housing remains unstable due to rising costs. Primary needs include better access across the housing spectrum in both new and existing builds, access to financial education, and programs to address workforce housing shortages in rural areas. Opportunities for financial institutions include investment in federal funding programs and seeking tax credit opportunities or incentives to build. There are no Community Development Financial Institutions, no Small Business Development Centers, and no HUD-approved counseling agencies within the AA.

Reno County AA

Assessment Area - Reno County AA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	5.88	11.76	76.47	5.88	0.00
Population by Geography	61,898	4.22	11.66	75.44	8.67	0.00
Housing Units by Geography	28,543	4.94	12.19	76.47	6.40	0.00
Owner-Occupied Housing by Geography	17,465	1.56	9.93	80.14	8.37	0.00
Occupied Rental Units by Geography	7,505	10.54	17.20	69.27	2.98	0.00
Vacant Units by Geography	3,573	9.74	12.71	73.64	3.92	0.00
Businesses by Geography	1,857	14.00	8.45	67.96	9.59	0.00
Farms by Geography	194	2.06	3.09	86.08	8.76	0.00
Family Distribution by Income Level	15,565	17.64	20.31	23.15	38.90	0.00
Household Distribution by Income Level	24,970	21.27	17.55	20.27	40.90	0.00
Unemployment rate (%)	4.35	9.49	3.80	4.01	5.89	0.00
Households Below Poverty Level (%)	12.81	38.66	19.50	10.88	6.52	0.00
Median Family Income (Non-MSAs - KS)		$65,183			Median Housing Value	$110,100
Median Family Income (Non-MSAs - KS) for 2024		$80,900			Median Gross Rent	$735
					Families Below Poverty Level	8.08
FFIEC File - 2020 Census						

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 Kansas

Examiners completed a full-scope review of the Reno County AA. We selected the Reno County AA for a full-scope review as it represented the majority of lending and deposit activity during the evaluation period. The Sedgwick County AA was selected for a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Kansas was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Kansas 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.

FNB demonstrated excellent distribution to borrowers in low-income census tracts by originating 4.04 percent of home mortgage loans in low-income census tracts, which exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans within the Reno County AA at 1.6 percent and 2.6 percent, respectively. FNB demonstrated reasonable distribution to borrowers in moderate-income census tracts by originating 8.4 percent of home mortgage loans in moderate-income census tracts, which was near the percentage of owner-occupied housing units and the aggregate distribution of loans at 9.9 percent and 10.95 percent, respectively.

Small Loans to Businesses

Refer to Table 9 in the state of Kansas 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.

FNB demonstrated excellent distribution of small loans to businesses in LMI census tracts. The bank's percentage of small loans to businesses in low-income geographies totaled 12.5 percent and was near the percentage of businesses in those geographies at 14 percent but exceeded the aggregate distribution of loans at 9.4 percent. The percentage of small loans to businesses in moderate-income geographies totaled 12.5 percent which exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans at 8.5 percent and 8.8 percent, respectively.

Lending Gap Analysis

No lending gaps were identified during this evaluation period.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of Kansas 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.

The bank originated 8.1 percent of home mortgage loans to low-income borrowers, in line with the aggregate distribution of loans at 9.4 percent but below the percentage of low-income families at 17.6 percent. Additionally, the bank originated 20.8 percent of home mortgage loans to moderate-income families, in line with the aggregate distribution of loans at 21.1 percent but exceeded the percentage of moderate-income families at 20.3 percent.

Small Loans to Businesses

Refer to Table 10 in the state of Kansas 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.

The distribution of small loans to businesses with revenues of $1 million or less is excellent. FNB originated 72.5 percent of the sampled small loans to businesses in the Reno County AA to businesses with revenues of $1 million or less, which is near demographic data of 77.8 percent and significantly exceeds the aggregate data of 58.9 percent.

Responses to Complaints

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

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Sedgwick County AA was generally consistent with the bank's overall performance under the Lending Test in the full scope area.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited excellent responsiveness to community development needs in the state 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 AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information 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.

Table 3: Community Development Loans

Assessment Area	Total			
	#	% of Total #	$(000's)	% of Total $
Reno County AA	14	66.7	11,121	90.1
Broader Statewide and Regional Area	7	33.3	1,226	9.9
Total	**21**	**100.0**	**12,347**	**100.0**

Reno County AA

CD loans exhibited excellent responsiveness to CD needs and opportunities in the AA during the evaluation period. FNB originated 14 loans totaling $11.1 million in Reno County. Six loans were for affordable housing, five were for economic development, and three were for an organization providing services to LMI individuals. The following are examples of CD loans the bank originated in the AA:

- Multifamily properties to provide affordable housing for LMI individuals.
- Operating lines of credit for nonprofit organizations providing services and affordable housing for LMI individuals.
- Construction, equipment, and capital loans to finance start-up businesses, which would create permanent jobs for LMI individuals or in LMI geographies.

Broader Statewide and Regional Area

FNB originated seven loans to one small business in the regional area. All loans were for economic development, as the small business is in an expansion phase and has created permanent jobs for LMI individuals.

Number and Amount of Qualified Investments

Table 4: Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Reno County AA	0	0	65	1,056	65	100.0	1,056	100.0	1	102
Total	**0**	**0**	**65**	**1,056**	**65**	**100.0**	**1,056**	**100.0**	**1**	**102**

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

Reno County AA

CD investments exhibited an excellent level of responsiveness to community needs and opportunities in the AA. FNB made capital contributions of $853,825 during the evaluation period to fund an affordable housing project in the AA. This investment has an unfunded commitment of $101,959 remaining. For the remaining donations, a majority of the donations were to non-profit organizations that provided services to LMI individuals, with various other donations going towards economic development and revitalization. The following are examples of qualified investments in the AA:

- Donations to an organization that partnered with local government, non-profit, and private organizations to meet county-wide economic development plans. Strategic focuses of the economic plan include uplifting individuals living below the Asset Limited, Income Constrained, and Employed (ALICE) threshold; issue start-up loans; and incentivize housing development;
- Donations to a non-profit organization that provide enrichment, housing, job training, and other services to LMI individuals with disabilities;
- Donations to a nonprofit organization that provides various services to LMI individuals with the goal of establishing strong foundations in education, financial stability, and health;
- Donations to fund college scholarships for LMI individuals; and
- Various other donations to organizations that provide services to LMIs such as food shelters, emergency support, and youth enrichment programs.

In addition to CD investments, the bank made non-qualifying CD donations to organizations that provide medical financing for cancer patients (medication co-pays, travel expenses, and other related costs); organizations that provide resources and support for victims of assault and abuse; and funding for school renovations. These donations did not have a primary purpose in CD as defined in the regulation and did not impact the rating.

Extent to Which the Bank Provides Community Development Services

Reno County AA

FNB demonstrated excellent responsiveness in providing CD services in the Reno County AA. Eight bank employees provided 1,084 CD service hours to eight qualifying CD organizations during the evaluation period. Examples of CD services provided by bank staff include:

- One bank employee provided services that assisted LMI borrowers obtain first-time homebuyer grants. The employee filled out requests and submitted data for the partnering organizations. By providing this service, five LMI individuals in Reno County were able to obtain first-time homebuyer grants totaling $44,500. Additionally, one non-first-time homebuyer was able to obtain a $12,500 grant through the FHLBs HOPE program.
- Two employees provided technical assistance as board members of a non-profit that provided services to LMI individuals and families to build a strong foundation in education, financial stability, and health.
- Two employees provided technical assistance as board members of a non-profit that provides emergency overnight shelter, transitional housing and job programs, and affordable housing to LMI individuals.
- Two employees provided technical assistance to separate Chambers of Commerce that provide economic development through resources to small businesses.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Sedgwick County AA was weaker than the bank's overall performance under the CD Test in the full scope area.

CD activities in the Sedgwick County AA represent adequate responsiveness given the higher level of competition, and a lower level of branches and employees. CD loans and CD services were weaker than the excellent responsiveness in the full scope area. FNB did not originate or purchase CD loans in the AA, and one employee provided 36 hours of CD services. CD Investments and donation volumes activities were consistent with the bank's excellent responsiveness in the full scope area. FNB made 10 investments totaling $814,865 in the Sedgwick County AA, with two unfunded commitments of $1.2 million for affordable housing projects.

Performance in the limited-scope area did not have a negative impact on the overall CD conclusion, as more weight was placed on the full-scope area based on the level of loans and deposits.

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:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, community development loans, qualified investments, and community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
State of Kansas		
Reno County AA	Full-scope	Reno County, Kansas
Sedgwick County AA	Limited-scope	Sedgwick County, Kansas

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
The First National Bank of Hutchinson	Outstanding	Outstanding	Outstanding
State:			
Kansas	Outstanding	Outstanding	Outstanding

(*) 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 the 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 low- and moderate-income 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): 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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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**.**

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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/AA. 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 7. **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 8. **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/AA. The table also presents aggregate peer data for the years the data is available.

Table 9. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares 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 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 AA.

Table 10. **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 11. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares 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 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 AA.

Table 12. **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 $500,000) 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 13. **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 14. **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/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	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
Reno County AA	322	42,718	64.14	3,552	1.56	4.04	2.62	9.93	8.39	10.95	80.14	75.47	76.77	8.37	12.11	9.66	--	--	--
Sedgwick County AA	180	39,385	35.86	40,700	2.08	2.78	1.74	21.57	26.67	21.33	40.20	36.11	39.29	35.95	34.44	37.41	0.21	--	0.22
Total	**502**	**82,103**	**100.00**	**44,252**	**2.01**	**3.59**	**1.81**	**20.13**	**14.94**	**20.50**	**45.12**	**61.35**	**42.30**	**32.55**	**20.12**	**35.18**	**0.18**	**--**	**0.21**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Reno County AA	322	42,718	64.14	3,552	17.64	8.07	9.40	20.31	20.81	21.09	23.15	14.91	19.54	38.90	37.58	25.03	--	18.63	24.94
Sedgwick County AA	180	39,385	35.86	40,700	20.28	6.67	8.81	18.57	10.00	19.60	21.01	12.22	19.88	40.14	22.22	27.89	--	48.89	23.83
Total	**502**	**82,103**	**100.00**	**44,252**	**19.99**	**7.57**	**8.85**	**18.76**	**16.93**	**19.72**	**21.25**	**13.94**	**19.85**	**40.00**	**32.07**	**27.66**	**--**	**29.48**	**23.92**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																					2022 - 2024
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Reno County AA	40	4,537	57.14	2,467	14.00	12.50	9.40	8.45	12.50	8.76	67.96	55.00	71.54	9.59	20.00	10.30	--	--	--		
Sedgwick County AA	30	6,846	42.86	27,320	2.83	0.00	2.71	24.27	20.00	21.80	32.43	26.67	31.61	37.88	53.33	40.90	2.60	0.00	2.97		
Total	**70**	**11,383**	**100.00**	**29,787**	**3.94**	**7.14**	**3.26**	**22.69**	**15.71**	**20.72**	**35.97**	**42.86**	**34.92**	**35.06**	**34.28**	**38.37**	**2.34**	**0.00**	**2.73**		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Reno County AA	40	4,537	57.14	2,467	77.81	72.50	58.90	7.43	20.00	14.75	7.50
Sedgwick County AA	30	6,846	42.86	27,320	82.92	56.67	51.60	5.57	40.00	11.51	3.33
Total	**70**	**11,383**	**100.00**	**29,787**	**82.41**	**65.72**	**52.21**	**5.75**	**28.57**	**11.83**	**5.71**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%