



**PUBLIC DISCLOSURE**

November 17, 2025

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Kleberg Bank, National Association  
Charter Number: 12968

100 East Kleberg Avenue  
Kingsville, TX 78364

Office of the Comptroller of the Currency

San Antonio Office  
10001 Reunion Place, Suite 250  
San Antonio, TX 78216

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

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

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

The major factors that support this rating include:

- The bank’s loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank’s loans are inside its assessment areas (AAs).
- The bank exhibits a reasonable geographic distribution of loans.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and to businesses of different sizes
- The bank exhibits adequate responsiveness to community development (CD) needs within its 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 was reasonable.

Kleberg Bank, National Association’s (KBNA) quarterly average LTD ratio, calculated on a bank-wide basis, for the 12-quarter evaluation period was 65.16 percent. The bank’s LTD ratio ranged from a low of 54.85 percent as of March 31, 2022, to a high of 76.55 percent as of December 31, 2024.

To assess the bank’s performance, we compared its average quarterly LTD ratio to four similarly situated community banks in the local and surrounding areas. The average quarterly LTD ratio for these institutions was 65.81 percent. The quarterly LTD ratios for the other institutions ranged from an average low of 55.52 percent to an average high of 77.64 percent.

### Lending in Assessment Area

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

The bank originated and purchased 58.75 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. The bank does not have any affiliate lending included in this assessment.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	24	60.00	16	40.00	40	5,568	64.03	3,128	35.97	8,696
Consumer	23	57.50	17	42.50	40	933	61.99	572	38.01	1,505
<b>Total</b>	<b>47</b>	<b>58.75</b>	<b>33</b>	<b>41.25</b>	<b>80</b>	<b>6,501</b>	<b>63.73</b>	<b>3,700</b>	<b>36.27</b>	<b>10,201</b>

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

## Description of Institution

KBNA is a full-service intrastate community bank headquartered in Kingsville, Texas. KBNA was chartered in 1926 and is solely owned by Kleberg and Company Bankers, Inc., a one-bank holding company. During the evaluation period, KBNA did not engage in any mergers or acquisitions, nor has the bank opened or closed any branch offices.

KBNA operates four branch locations, one drive-in facility, six image-enabled automated teller machines (ATMs), and one interactive teller machine in the cities of Corpus Christi and Kingsville, all within the state of Texas. As of December 31, 2024, the bank reported total assets of \$700 million, tier one capital of \$67.3 million and a tier one leverage ratio of 9.7 percent. Net loans totaled \$469 million and represented 67 percent of total assets. The loan portfolio is composed of commercial loans (56 percent), residential real estate loans (21 percent), consumer loans (17 percent), agricultural loans (3 percent), and other loans (2 percent).

KBNA offers a variety of consumer, commercial, and deposit products for its customers as well as brokerage services through Kleberg Wealth Management. Consumer products include mortgage loans, auto loans, and secured and unsecured personal loans. Commercial products include construction loans, business term loans, lines of credit, and real estate loans. Deposit products include a free student checking account, low-cost checking and interest earning checking accounts, saving accounts, and time deposits. The bank website provides detailed information on branch operating hours, account fees, account fee waivers, and overdraft protection. Online banking, mobile banking, and 24-hour support through Telephone Banking are available to customers.

KBNA has two AAs in the state of Texas, Kleberg County and the entire Corpus Christi Metropolitan Statistical Area (MSA). Based on the financial condition, size, and product offerings, there are no legal, financial or other factors that inhibit KBNA's ability to help meet the credit needs in its AAs. The prior examination dated October 31, 2022, assigned an overall "Satisfactory" rating to KBNA's CRA performance.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated KBNA's CRA performance using the Intermediate Small Bank (ISB) examination procedures, which includes a lending test and CD test. The bank's primary lending products include commercial lending, residential lending, and non-real estate consumer lending. The evaluation period covered loans originated from January 1, 2022, through December 31, 2024. We tested mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA) from 2022 through 2024 to verify accuracy of reported data and found the data reliable for use in this evaluation.

Based on analysis of lending information and discussions with bank management, commercial loans and consumer loans were determined to be the bank's primary products during the evaluation period. To evaluate lending performance, we selected a random sample of small loans to businesses and consumers. We also evaluated CD loans, investments, and CD services.

For the geographic and borrower distribution analyses, we compared lending performance data to updated 2024 American Community Survey census data and 2024 Dun and Bradstreet commercial business data. Due to changes in AA demographics during the review period, we combined and analyzed 2022 and 2023 data separately from 2024 data.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated 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.

KBNA has two AAs in the state of Texas, Kleberg County and the entire Corpus Christi MSA. We performed a full scope review for both AAs since the bank’s deposits are spread close to evenly between the two AAs with 53 percent of the bank’s deposits in the Corpus Christi MSA and 47 percent in Kleberg County. While the Corpus Christi MSA has more loan volume the bank is still headquartered in Kleberg County and at 53 percent it has the largest share of the local deposit market share compared to other financial institutions within the AA.

### **Ratings**

The bank’s overall rating is based on performance in the State of Texas. The state rating is based equally on performance in the bank’s two AAs. When evaluating the Corpus Christi MSA AA small business lending was weighted heavier when concluding on the lending test due to commercial lending representing a significant portion of the loan portfolio during the evaluation period. When evaluating the Kleberg County AA consumer lending was weighted heavier when concluding on the lending test due to the bank receiving minimal small business loan demand from its customer base within the AA. 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) (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 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 exhibits a reasonable distribution of loans by income level of the geography.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and to businesses of different sizes
- The bank exhibits adequate responsiveness to CD needs within its AAs
- The bank did not receive any CRA related complaints during the evaluation period.

### Description of Institution's Operations in Texas

KBNA has two AAs in the state of Texas, Kleberg County and the entire Corpus Christi MSA. The Corpus Christi MSA is made up of three counties Nueces County with 97 census tracts (CTs), San Patricio County with 16 CTs, and Aransas County with 11 CTs. The Kleberg County AA is not part of an MSA and includes all 10 census tracts within Kleberg County. The bank's head office is in Kingsville, TX, which is located within the Kleberg County AA. The branch locations are in Corpus Christi, TX which is in Nueces County which is located within the bank's Corpus Christi MSA AA. Both AAs form a contiguous banking region, meet the requirements of the regulation, and do not exclude any low- or moderate-income (LMI) geographies.

#### Kleberg County AA

Kleberg County is 881 square miles and located in the Texas Coastal Bend Region directly south of the Corpus Christi metro area. Kleberg County is bordered by Nueces, Jim Wells, Kennedy, and Brooks Counties. Communities included in the Kleberg County AA include Kingsville, Ricardo, and Rivera. The AA consists of four middle-income, three upper-income, two moderate-income, and one tract that has not been assigned an income classification. There is one full-service branch located in the city of Kingsville within a middle-income CT. KBNA also has a drive-in facility located in a moderate-income CT in Kingsville which offers drive-thru services for customers. There are four ATMs within the Kleberg County AA, three located in moderate-income CTs and one located in a middle-income CT. QuickFacts data from the United States Census Bureau (census) shows that Kleberg County had a total population of 30,442 as of July 1, 2024. This was a decline of about two percent from the April 1, 2020, census data shown in the table below. Kingsville, TX is the largest city in the county with an estimated population of 24,884.

Census data from 2023 reported that the AA median household income was \$57,612 (from 2019-2023). The 2023 census data reported a county-wide poverty rate of 22 percent, which significantly exceeded the state-wide and national poverty rates of 14 percent and 13 percent, respectively. The 2019-2023 ACS 5-year census estimate reports that 21 percent of households receive Supplemental Nutrition Assistance Program (SNAP) benefits, with an estimated 57 percent of households that received SNAP

having children under the age of 18. Information from the Texas Education Agency (TEA) provides additional perspective on low- and moderate-income populations in the AA through their reports on local school districts. TEA reports show that during 2023-2024, about 69 percent of the students in the county were economically disadvantaged or eligible for free or reduced lunch programs. This percentage was higher than the 62 percent for the state of Texas.

As reflected in the table below, the median housing value in the AA was \$102,450. More recent data from second quarter 2025 from the National Association of Realtors (NAR) reflects an increase in the median value to \$168,710. The NAR also estimated that due to higher mortgage rates and home prices, the typical mortgage payment is higher by \$19 as compared to second quarter 2024.

The U.S. Bureau of Labor Statistics (BLS) identified the 2024 annual average unemployment rate for Kleberg County as 4.4 percent, which is in line with the state and national unemployment rates of 4.1 and 4 percent, respectively. The largest industries in the AA are retail trade at 17 percent, education services at 15 percent, and health care and social assistance services at 10 percent. Kingsville serves as the county seat for Kleberg County. Major employers in the area include Texas A&M University at Kingsville, the Naval Station, municipal and county government offices, HEB Food Stores, and the school district. Tourism plays a vital role in the economy of Kleberg County and Kingsville. With Kleberg County being near Corpus Christi, Padre Island, and the Gulf of Mexico, fishing and boating are popular activities among tourists.

Kleberg County has a competitive banking environment, including offices of six local and national deposit-taking financial institutions. The FDIC's Deposit Market Share Report as of December 31, 2024, shows KBNA holding the largest share of the deposit market at 53 percent. Wells Fargo Bank, National Association holds the next largest market share at 23 percent. In addition to local, state, and national banks, the bank faces additional competition from credit unions.

To help identify the needs and opportunities in the AA we leveraged recent community contacts completed with local organizations that focus on economic development in the AA. Contacts indicated that housing prices continue to place pressure on the LMI communities. The contact indicated a large need in the community is access to small business lending to help fund new ventures and existing business expansions. As well as continuing to provide or sponsor training for small business owners and entrepreneurs. The contact had favorable opinions on local financial institutions' involvement in the community noting that financial institution representatives are visible in the community and serve on non-profit board

Assessment Area – Kleberg County 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.00	20.00	40.00	30.00	10.00
Population by Geography	31,040	0.00	26.94	40.26	32.79	0.00
Housing Units by Geography	13,310	0.00	24.85	40.92	34.22	0.00
Owner-Occupied Housing by Geography	5,815	0.00	25.11	39.50	35.39	0.00
Occupied Rental Units by Geography	5,325	0.00	23.66	40.06	36.28	0.00
Vacant Units by Geography	2,170	0.00	27.10	46.87	26.04	0.00
Businesses by Geography	714	0.00	36.83	25.35	37.82	0.00
Farms by Geography	33	0.00	6.06	30.30	63.64	0.00
Family Distribution by Income Level	7,175	25.97	16.08	15.11	42.84	0.00
Household Distribution by Income Level	11,140	30.00	12.47	20.30	37.24	0.00
Unemployment rate (%)	5.83	0.00	8.02	7.78	2.51	0.00
Households Below Poverty Level (%)	26.53	0.00	43.71	30.38	10.53	0.00
Median Family Income (Non-MSAs - TX)		\$61,809			Median Housing Value	\$102,450
Median Family Income (Non-MSAs - TX) for 2024		\$75,500			Median Gross Rent	\$873
					Families Below Poverty Level	19.25
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						

## CORPUS CHRISTI MSA AA

The AA consists of all 124 tracts within Nueces, San Patricio, and Aransas Counties, which makes up the Corpus Christi MSA in Southeast Texas. All three branches are within the Corpus Christi city limits which is the county seat of Nueces County. Two of the branches are in low-income CTs and the third is in a low-income CT. There are 3 ATMs within the Corpus Christi MSA, with two located in moderate-income CTs and the third located in a low-income CT.

Nueces County consists of 97 CTs located within the county. The CTs include four low-, 25 moderate-, 36 middle-, 29 upper-, and three tracts that have not been assigned an income classification. The bank operates three full-service branches within the Nueces County AA. Nueces County is 1,166 square miles and is located in the Texas Coastal Bend Region directly north of Kleberg County. Communities included in the Nueces County include Corpus Christi, Port Aransas, Robstown, and Driscoll. The county’s population has remained relatively stable over the review period. QuickFacts data from the United States Census Bureau (census) shows that Nueces County had a total population of 353,125 as of July 1, 2024, compared to 353,357 from the April 1, 2020, census data. Corpus Christi, TX is the largest city in the county with an estimated population of 317,317.

San Patricio County consists of 16 CTs located within the county. The CTs include 5 moderate-, 7 middle-, and 4 upper-income tracts. Prominent cities in San Patricio County include Portland, Ingleside, and Aransas Pass, with Sinton serving as the county seat. QuickFacts data from the United States Census Bureau (census) shows that San Patricio County had a total population of 71,467 as of July 1, 2024. This was an increase of about four percent from the April 1, 2020, census data. Portland, TX is the largest city in the county with an estimated population of 20,275.

Aransas County consists of 11 CTs located within the county. The CTs include 2 moderate-, 3 middle-, 3 upper-, and three tracts that have not been assigned an income classification. Prominent cities in Aransas County include Rockport which serves as the county seat, and Fulton. QuickFacts data from the

United States Census Bureau (census) shows that Aransas County had a total population of 25,595 as of July 1, 2024. This was an increase of about seven percent from the April 1, 2020, census data. Rockport, TX is the largest city in the county with an estimated population of 11,069.

According to Moody's Analytics, the Corpus Christi MSA has an overall favorable economic outlook with the defense, and energy and resources industries being the main economic drivers. Employment in Corpus Christi has been growing steadily in recent months, in contrast with the weakness nationally. Most industries have been outperforming their respective national totals, especially goods-producing and professional services. The unemployment rate has fluctuated around 4.3 percent, close to the national rate, and labor force participation has been rising in contrast with the national decline. Housing market indicators have been mixed.

Corpus Christi will outperform the nation over the coming year as various infrastructure projects support gains in its distribution industry. Longer term, however, population decline, and other structural factors such as the water supply issue will constrain growth. Positive economic factors for the AA include the Port of Corpus Christi expansions which will lead to growth in exports as the port's strategic gulf location is ideal for trade and exports. The rising demand for LNG boosts the distribution industry. Lastly the low cost of living and coastal location attract retirees and tourists. Weaknesses that can impact long-term growth include the lack of well-paying jobs which accelerates out-migration as residents relocate to larger metro areas. Low educational attainment and relative geographical isolation reduce the attractiveness to prospective employers. The heavy reliance on international trade adds cyclical to the outlook. Lastly uncertainty surrounding oil prices causes oil companies to hold back on investment.

The most common employment sectors are Health Care & Social Assistance, Retail Trade, and Construction. Major employers in the area include the Naval Air Station Corpus Christi, Corpus Christi Army Depot, Christus Spohn Hospital, Driscoll Children's Hospital, Corpus Christi Medical Center, Kiewit Offshore Services, Bay Ltd., Del Mar College, Texas A&M University at Corpus Christi, municipal and county government offices, various oil and energy refineries, shipping companies, and the various school districts in the region. Tourism plays a vital role in the local economy as several of the coastal cities are popular spring break and summer vacation destinations due to the beaches and proximity to the Gulf of Mexico and Padre Island Seashore.

The Corpus Christi MSA has a very competitive banking environment, including offices of 17 local and national deposit-taking financial institutions. The FDIC's 2024 Deposit Market Share Report shows KBNA ranking seventh in deposit market share at 4 percent. Frost Bank holds the largest market share at 23 percent. In addition to local, state, and national banks, KBNA also faces competition from credit unions, mortgage companies, and non-bank lenders.

To help identify the needs and opportunities in the AA we completed two community contacts which focused on economic development and small business development in the county. Both contacts indicated extensive shortfall in affordable housing for LMI individuals and an inability for builders to meet the demand for affordable housing. The other contact indicated that there are many finance opportunities in the AA for small business lending. Both contacts had favorable opinions on local financial institutions' involvement in the community noting that financial institution representatives are visible in the community and serve on non-profit boards.

Assessment Area - Corpus Christi MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	3.23	25.81	37.10	29.03	4.84
Population by Geography	445,763	3.69	23.99	37.94	32.88	1.50
Housing Units by Geography	195,034	3.82	23.70	38.43	32.23	1.83
Owner-Occupied Housing by Geography	100,554	2.48	23.66	36.04	35.82	1.99
Occupied Rental Units by Geography	63,267	6.55	24.97	43.10	24.90	0.48
Vacant Units by Geography	31,213	2.61	21.24	36.62	35.49	4.04
Businesses by Geography	16,177	3.34	18.92	35.98	40.06	1.71
Farms by Geography	606	2.48	15.02	31.85	48.68	1.98
Family Distribution by Income Level	111,473	23.27	16.31	18.30	42.12	0.00
Household Distribution by Income Level	163,821	25.15	15.32	17.14	42.39	0.00
Unemployment rate (%)	5.80	6.88	7.92	5.32	3.81	22.73
Households Below Poverty Level (%)	16.52	37.27	24.94	16.01	7.76	22.70
Median Family Income (18580 - Corpus Christi, TX MSA)		\$67,020			Median Housing Value	\$133,050
Median Family Income (18580 - Corpus Christi, TX MSA) for 2024		\$81,100			Median Gross Rent	\$1,048
					Families Below Poverty Level	12.43
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 Texas

The bank has two designated AAs, the Kleberg County AA, and the Corpus Christi MSA AA. Due to the opportunities for lending and community development, and the volume of loans and deposits in both AAs, we selected both areas for full-scope reviews during the evaluation period. We evaluated performance in each AA equally.

## 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-scope reviews, the bank’s lending performance in the state of Texas was reasonable.

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

The bank exhibited reasonable geographic distribution of loans in the state of Texas.

#### *Small Loans to Businesses*

Refer to Table 9 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.

Kleberg County AA

In 2022-2023, the geographic distribution of small loans to businesses was poor. The AA does not include any low-income geographies. The percentage of small loans to small businesses in moderate-income geographies is lower than both the percentage of businesses located in moderate-income geographies and the aggregate lending performance of other small business lenders in the area.

In 2024, the bank originated nine small loans to businesses in the Kleberg County AA which is too small for meaningful analysis to be performed. This had neither a positive nor negative impact on the overall rating received.

Corpus Christi MSA AA

In 2022-2023, the geographic distribution of small loans to businesses was reasonable. The bank did not originate any small loans to businesses in low-income geographies; however, the percentage of businesses located in low-income geographies was minimal at 3.43 percent and aggregate lending performance of other small business lenders in low-income geographies was also minimal at 2.75 percent. The percentage of bank loans in moderate-income geographies exceeded both the percentage of businesses located in moderate-income geographies and the aggregate lending performance of other small business lenders in the area.

In 2024, the geographic distribution of small loans to businesses was excellent. The percentage of bank loans in low- and moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate lending performance of other small business lenders in the area.

***Consumer Loans***

Refer to Table 13 in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Kleberg County AA

In 2022-2023, the geographic distribution of consumer loans was excellent. The AA does not have any low-income census tracts. The percentage of consumer loans in moderate-income census tracts exceeded the percentage of households located within these CTs.

In 2024, the geographic distribution of consumer loans was excellent. The AA does not have any low-income census tracts. The percentage of consumer loans in moderate-income census tracts exceeded the percentage of households located within these CTs.

Corpus Christi MSA AA

In 2022-2023, the geographic distribution of consumer loans was excellent. The percentage of consumer loans in low-income CTs and moderate-income CTs both exceeded the percentage of households located within these CTs.

In 2024, the geographic distribution of consumer loans was reasonable. No consumer loans in the sample data were originated in low-income CTs while 4.06 percent of households are located in these CTs. The percentage of consumer loans in moderate-income CTs is somewhat lower than the percentage

of households within these CTs. Given the demographic data, examiners placed emphasis on the bank's performance in the moderate-income census tracts.

### ***Lending Gap Analysis***

We reviewed geographic distribution reports for small loans to businesses and consumer loans in the AAs and did not identify any unexplained conspicuous gaps in lending activity.

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

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

### ***Small Loans to Businesses***

Refer to Table 10 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.

#### **Kleberg County AA**

In 2022-2023, the distribution of small loans to small businesses was reasonable. The percentage of small loans to small businesses was somewhat lower than the percentage of businesses identified as having revenue less than or equal to \$1 million within the AA and near to the percentage of aggregate lending to these businesses reported by financial institutions.

In 2024, the bank originated nine small loans to businesses in the Kleberg County AA which is too small for meaningful analysis to be performed. This had neither a positive nor negative impact on the overall rating received.

#### **Corpus Christi MSA AA**

In 2022-2023, the distribution of small loans to small businesses was reasonable. The percentage of small loans to small businesses was near to the percentage of businesses identified as having revenue less than or equal to \$1 million within the AA and exceeded the percentage of aggregate lending to these businesses reported by financial institutions.

In 2024, the distribution of small loans to small businesses was reasonable. The percentage of small loans to small businesses was near to the percentage of businesses identified as having revenue less than or equal to \$1 million within the AA.

## ***Consumer Loans***

Refer to Table 14 in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

### Kleberg County AA

In 2022-2023, the distribution of consumer loans to borrowers of different income levels was reasonable. The percentage of loans to low-income borrowers was lower than the percentage of low-income households in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households in the AA. The lower penetration to low-income borrowers can be attributed to higher levels of poverty and unemployment in the AA.

In 2024, The distribution of consumer loans to borrowers of different income levels was reasonable. The percentage of loans to low-income borrowers was lower than the percentage of low-income households in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households in the AA. The lower penetration to low-income borrowers in this AA can be attributed to higher levels of poverty and unemployment as 19.3 percent of families in the Kleberg County AA have incomes below the poverty level which impact their ability to qualify for loans.

### Corpus Christi MSA AA

In 2022-2023, the distribution of consumer loans to borrowers of different income levels was reasonable. The percentage of loans to low-income borrowers was somewhat lower than the percentage of low-income households in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households in the AA.

In 2024, the distribution of consumer loans to borrowers of different income levels was reasonable. The bank did not originate any consumer loans in low-income geographies in the AA. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households in the AA. The lower penetration to low-income borrowers in this AA can be attributed to higher levels of poverty and unemployment as 12.4 percent of families in the Corpus Christi MSA AA have incomes below the poverty level which impact their ability to qualify for loans.

## **Responses to Complaints**

There were no consumer complaints regarding the bank's CRA performance or complaints indicating illegal or discriminatory lending practices during the evaluation period.

## 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 full-scope reviews the bank exhibited adequate 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 AAs.

### 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.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Kleberg County AA	2	66.67	580	30.85
Corpus Christi MSA	1	33.33	1,300	69.15
<b>Total</b>	<b>3</b>	<b>100.00</b>	<b>1,880</b>	<b>100.00</b>

The following are CD loans the bank originated or purchased during the evaluation period:

- In the Kleberg County AA, responsiveness to AA needs through CD lending was adequate. Two qualified loans in the AA were originated totaling \$580 thousand to provide affordable housing in underserved or distressed tracts in the AA.
- In the Corpus Christi MSA AA, responsiveness to AA needs through CD lending was adequate. One qualifying loan totaling \$1.3 million was originated to fund the construction of a new veterinary clinic located in the Corpus Christi MSA. The business provides a need to the AA as the wider Coastal Bend region is affected by the nationwide shortage of veterinarians and it promote business growth and job creation.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kleberg County AA	0	0	8	32	8	20.51	32	5.44	0	0
Corpus Christi MSA	1	358	24	92	25	64.10	450	76.53	0	0
Broader Statewide or Regional Area	0	0	6	106	6	15.38	106	18.03	0	0
<b>Total</b>	<b>1</b>	<b>358</b>	<b>38</b>	<b>230</b>	<b>39</b>	<b>100.00</b>	<b>588</b>	<b>100.00</b>	<b>0</b>	<b>0</b>

*Due to rounding, totals may not equal 100.00%*

During the evaluation period, the bank's responsiveness to community development needs through qualified investments was adequate in both the Kleberg County AA and Corpus Christi MSA AA. The bank made eight qualified donations totaling \$32 thousand in the Kleberg County AA. In the Corpus Christi MSA AA, the bank made 24 qualified donations totaling \$92 thousand during the current period and one prior period investment with a book value of \$358 thousand. The donations in the Corpus Christi MSA AA provided funding for LMI services including youth programs, small business finance, and scholarships that target LMI individuals. The prior period investment was a local municipal bond to improve city-wide facilities that provide benefit to all residents, including LMI residents. The bank also made six qualified investments and donations totaling \$106 thousand in the broader/statewide area which had a positive impact on the overall CD rating.

Examples of qualified investments and donations include:

- \$19,500 to the Dream Come True Foundation. The foundation assists people in poverty in South Texas with education, mentoring, and financial support.
- \$10 thousand to Del Mar College Foundation, Inc, which is part of a \$50 thousand commitment to create a need-based scholarship fund at a local college.
- \$10 thousand to fund college scholarships for GED recipients, most of which have low- and moderate-incomes. Scholarship funds are matched by local colleges.
- \$9 thousand to United Way of the Coastal Bend which assists people in poverty in South Texas with education, mentoring, and financial support.
- \$3,250 to a local Boys & Girls Club to fund afterschool programs which provide financial skills and management courses to LMI youth
- \$103,043 to an Independent Bankers Capital Funds which are part of a government-sponsored investment fund to provide capital to small businesses. Investments into these funds are matched 2 to 1 by the SBA.

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

The bank's volume of CD services demonstrates excellent responsiveness to its AA needs. For the Kleberg County AA, bank employees provided 1,286 CD services hours to the community through volunteer efforts at community organizations or events. Activities included providing leadership and technical expertise through board and committee memberships. For the Corpus Christi MSA AA, bank employees provided 837 CD service hours through volunteer efforts including providing leadership and

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

technical expertise through board and committee memberships as well as providing financial literacy presentations.

KBNA's physical locations and online services are reasonably accessible to the entire community, including LMI individuals. Two branches are in low-income CTs, one in a moderate-income CT, and one in a middle-income CT. Five ATMs are in moderate-income CTs, one ATM is in low-income CT, and one ATM is in a middle-income CT.

Examples of CD services conducted during the evaluation period include:

- Kiwanis Club of Kingsville – One employee serves as treasurer and uses their financial skills to assist with budgeting and disbursement of funds. The club serves the needs of local children, fighting hunger, and improving literacy.
- Kingsville Education Foundation – One employee serves as treasurer. The fundraising committee provides grants to teachers for computers, books, and other classroom necessities in schools where the majority of students are economically disadvantaged.
- Dream Come True Foundation of South Texas – One employee is president and a founding member of the program. The employee also sits on the investment committee and uses her financial skills to help with budgeting and disbursement of funds. The foundation assists people in poverty in South Texas with education, mentoring, and financial support.
- United Way of the Coastal Bend – One employee serves as Secretary and Chair of the investment committee. The organization is a non-profit which focuses on education, health, and financial stability, primarily for LMI individuals and families.
- Kiwanis Club of CC Bay – One employee serves on the board taking part in the financial planning of the allocation of funds to help under-privileged children in the area. The club serves the needs of local children, fighting hunger and improving literacy.
- Workforce Solutions – One employee serves on the board of directors and is responsible for monitoring all activities associated with the delivery of programs through the business and career centers. The organization provides adult education, literacy, workforce relevant educational training for youth, and disability employment services.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Small business and consumer loans Qualified loans, investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Texas</b>		
Kleberg County AA	Full-Scope	Includes all CTs within the county
Corpus Christi MSA	Full-Scope	Includes all three counties within the MSA, Nueces County, San Patricio County, and Aransas County

## Appendix B: Summary of State Ratings

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RATINGS: Kleberg Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Kleberg Bank, National Association	Satisfactory	Satisfactory	Satisfactory
State:			
Texas	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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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

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### 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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 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 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 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 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023		
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		
Corpus Christi MSA 2022-2023	204,765	54.05	15,365	3.43	0.00	2.75	19.68	45.00	18.36	37.73	20.00	35.28	38.95	35.00	43.57	0.22	0.00	0.04			
Kleberg County AA 2022-2023	173,055	45.95	715	--	0.00	--	37.20	11.76	33.01	26.78	41.18	33.71	36.02	47.06	33.29	--	0.00	--			
<b>Total</b>	<b>377,820</b>	<b>100.00</b>	<b>16,080</b>	<b>3.25</b>	<b>0.00</b>	<b>2.62</b>	<b>20.58</b>	<b>29.73</b>	<b>19.01</b>	<b>37.16</b>	<b>29.73</b>	<b>35.21</b>	<b>38.80</b>	<b>40.54</b>	<b>43.12</b>	<b>0.21</b>	<b>0.00</b>	<b>0.04</b>			

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA 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																			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		
Corpus Christi MSA 2024	202,409	68.97	--	3.34	5.00	--	18.92	45.00	--	35.98	15.00	--	40.06	35.00	--	1.71	0.00	--			
Kleberg County AA 2024	9,625	31.03	--	--	0.00	--	36.83	0.00	--	25.35	88.89	--	37.82	11.11	--	--	0.00	--			
<b>Total</b>	<b>293,034</b>	<b>100.00</b>	<b>--</b>	<b>3.20</b>	<b>3.45</b>	<b>--</b>	<b>19.67</b>	<b>31.03</b>	<b>--</b>	<b>35.53</b>	<b>37.93</b>	<b>--</b>	<b>39.96</b>	<b>27.59</b>	<b>--</b>	<b>1.63</b>	<b>0.00</b>	<b>--</b>			

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- 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 - 2023
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
Corpus Christi MSA 2022-2023	20	4,765	54.05	15,365	83.35	75.00	47.85	3.87	20.00	12.78	5.00
Kleberg County AA 2022-2023	17	3,055	45.95	715	79.27	47.06	57.90	2.73	35.29	18.01	17.65
<b>Total</b>	<b>37</b>	<b>7,820</b>	<b>100.00</b>	<b>16,080</b>	<b>83.14</b>	<b>62.16</b>	<b>48.30</b>	<b>3.81</b>	<b>27.03</b>	<b>13.05</b>	<b>10.81</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 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											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
Corpus Christi MSA 2024	20	2,409	68.97	--	82.75	75.00	--	3.72	25.00	13.53	0.00
Kleberg County AA 2024	9	625	31.03	--	79.69	44.44	--	2.80	55.56	17.51	0.00
<b>Total</b>	<b>29</b>	<b>3,034</b>	<b>100.00</b>	<b>--</b>	<b>82.62</b>	<b>65.52</b>	<b>--</b>	<b>3.68</b>	<b>34.48</b>	<b>13.69</b>	<b>0.00</b>

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

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2022 - 2023
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Corpus Christi MSA 2022-2023	20	619	50.00	4.32	15.00	24.40	60.00	40.46	25.00	30.82	0.00	--	0.00	
Kleberg County AA 2022-2023	20	791	50.00	--	0.00	24.42	30.00	39.77	50.00	35.82	20.00	--	0.00	
<b>Total</b>	<b>40</b>	<b>1,410</b>	<b>100.00</b>	<b>4.02</b>	<b>7.50</b>	<b>24.40</b>	<b>45.00</b>	<b>40.42</b>	<b>37.50</b>	<b>31.15</b>	<b>10.00</b>	<b>--</b>	<b>0.00</b>	

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

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2024
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Corpus Christi MSA 2024	20	790	50.00	4.06	0.00	24.17	15.00	38.77	45.00	31.61	35.00	1.40	5.00	
Kleberg County AA 2024	20	775	50.00	--	0.00	24.42	30.00	39.77	50.00	35.82	20.00	--	0.00	
<b>Total</b>	<b>40</b>	<b>1,565</b>	<b>100.00</b>	<b>3.80</b>	<b>0.00</b>	<b>24.18</b>	<b>22.50</b>	<b>38.83</b>	<b>47.50</b>	<b>31.87</b>	<b>27.50</b>	<b>1.31</b>	<b>2.50</b>	

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

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2023	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Corpus Christi MSA 2022-2023	20	619	50.00	25.16	20.00	15.32	25.00	17.29	25.00	42.23	30.00	--	0.00	
Kleberg County AA 2022-2023	20	791	50.00	29.94	5.00	12.46	25.00	20.32	35.00	37.28	35.00	--	0.00	
<b>Total</b>	<b>40</b>	<b>1,410</b>	<b>100.00</b>	<b>25.48</b>	<b>12.50</b>	<b>15.12</b>	<b>25.00</b>	<b>17.50</b>	<b>30.00</b>	<b>41.90</b>	<b>32.50</b>	<b>--</b>	<b>0.00</b>	

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

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2024	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Corpus Christi MSA 2024	20	790	50.00	25.15	0.00	15.32	20.00	17.14	25.00	42.39	55.00	--	0.00	
Kleberg County AA 2024	20	775	50.00	30.00	5.00	12.47	25.00	20.30	20.00	37.24	50.00	--	0.00	
<b>Total</b>	<b>40</b>	<b>1,565</b>	<b>100.00</b>	<b>25.46</b>	<b>2.50</b>	<b>15.14</b>	<b>22.50</b>	<b>17.34</b>	<b>22.50</b>	<b>42.06</b>	<b>52.50</b>	<b>--</b>	<b>0.00</b>	

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