



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

March 23, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Constitution Bank, National Association
Charter Number: 14510

230 South Main
Hillsboro, IL 62049

Office of the Comptroller of the Currency

500 N. Broadway
Suite 1700
ST. Louis, MO 63102

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 Lending Test and Community Development (CD) Tests are based on the bank's performance in the state of Illinois.
- The bank's quarterly average loan-to-deposit (LTD) ratio is reasonable during the evaluation period.
- A majority of loans were originated or purchased inside the bank's assessment areas (AAs).
- The distribution of loans among different income geographies is reasonable.
- The distribution of loans among borrowers of different income levels reflects reasonable penetration.
- The bank demonstrates adequate responsiveness to the community development needs of its AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was reasonable. The bank's quarterly LTD ratio averaged 69.7 percent over the 12-quarter period since the prior CRA evaluation ending December 31, 2021. Over the same period, the LTD ratio ranged from a low of 57.3 percent to a high of 77.7 percent.

To assess the bank's performance, examiners compared the bank's average LTD ratio to similarly situated Federal Deposit Insurance Corporation (FDIC) insured financial institutions based on a combination of their size, location, and lending opportunities, which included seven banks with branches in the AAs. The seven banks had total assets ranging from \$355 million to \$1.6 billion, with a combined quarterly average LTD ratio of 62.8 percent over the same 12-quarter period. The lowest individual quarterly average ratio was 49.7 percent, while the highest individual average was 74.3 percent. Constitution Bank ranked third out of eight when comparing the average ratios.

Loan-to-Deposit Ratio		2022-2024
Institution	Average Quarterly LTD Ratio	Total Assets (\$000s) as of December 31, 2024
Bank & Trust Company	74.3%	\$633,157
Dieterich Bank	70.2%	\$1,568,158
Constitution Bank, N.A.	69.7%	\$659,873
Germantown Trust & Savings Bank	66.2%	\$510,030
Washington Savings Bank	65.6%	\$586,243
The FNB Community Bank	57.9%	\$493,982
Teutopolis State Bank	56.0%	\$354,961
The Bradford National Bank of Greenville	49.7%	\$655,588
<i>Source: Quarterly FFIEC Call Reports 01/01/2022 – 12/31/2024</i>		

Lending in Assessment Area

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

The bank originated and purchased 81.9 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										
2022	193	88.13	26	11.87	219	23,244	69.73	10,091	30.27	33,334
2023-2024	283	82.51	60	17.49	343	42,214	61.40	26,543	38.60	68,757
Subtotal	476	84.70	86	15.30	562	65,458	64.12	36,634	35.88	102,091
Small Business										
2022	24	60.00	16	40.00	40	7,210	22.41	24,966	77.59	32,175
2023-2024	26	65.00	14	35.00	40	24,664	57.30	18,376	42.70	43,040
Subtotal	50	62.50	30	37.50	80	31,874	42.38	43,342	57.62	75,216
Total	526	81.93	116	18.07	642	97,332	54.89	79,976	45.11	177,307
Source: 01/01/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

Constitution Bank, N.A., formerly known as Bank of Hillsboro, N.A., is an intrastate, federally chartered financial institution headquartered in Hillsboro, Illinois. The bank is a wholly owned subsidiary of Country Bancorp, Inc., also located in Hillsboro. The board changed the bank's name effective September 2, 2025, in efforts to expand its presence beyond the Hillsboro, Illinois area.

As of December 31, 2024, Constitution Bank operated 11 full-service branches within the state of Illinois. In addition, the bank operated 11 automated teller machines (ATM), one at each branch location, with no standalone ATMs. None of the bank's ATMs have deposit-taking capabilities.

Since the prior performance evaluation, the bank opened four branches (Glen Carbon, Hamel, Mt. Olive, and Troy), relocated one branch (Edwardsville), and closed three branches (Altamont, Keyesport, and Pana). Given the timing of branch changes, the performance of the Altamont location (closed November 2024) was assessed for the entire three-year evaluation period, the performance of the Pana location (closed May 2023) was only assessed for 2022, the Mt. Olive location (opened October 2022) was only assessed for 2023 and 2024, the performance of the Hamel location (opened February 2024) was only assessed for 2024, and the performance of the Keyesport location (closed June 2022) was not considered during this review. Given the Glen Carbon and Troy locations were opened after the current CRA evaluation period, we did not assess lending performance from those branches. After the recent branch adjustments, the bank currently operates in 13 locations. There were no affiliate or subsidiary activities considered in this evaluation.

As of December 31, 2024, Constitution Bank had total assets of \$621 million, total deposits of \$572.2 million, and common equity tier 1 capital of \$59.9 million. The bank's total loans were \$435.2 million or 70.1 percent of total assets. The loan portfolio is comprised of \$309 million (71 percent) in commercial loans, \$57.8 million (13.3 percent) in residential loans, \$50.4 million (11.6 percent) in agricultural loans, \$7.8 million (1.8 percent) in consumer loans, and \$10.3 million (2.4 percent) in other loans and leases.

The bank offers a broad range of real estate, commercial, agriculture, and consumer credit products, as well as deposit products and services for personal and business clients. The bank's personal banking products and services include traditional deposit products (checking and savings accounts, certificates of deposits, and money market accounts), individual retirement accounts, health savings accounts, and safe deposit boxes. Lending products include fixed- and adjustable-rate mortgages, home equity loans, construction loans, and auto loans. The bank's business banking products and services include, but are not limited to, business checking and savings accounts, commercial loans, commercial real estate loans, agricultural loans, and lines of credit.

Constitution Bank participates in various lending programs offered by government-sponsored enterprises and government agencies to expand lending opportunities beyond conventional underwriting standards. Examples include a down payment assistance program for income-eligible borrowers and a separate Very-Low Income Purchase mortgage program, both through Freddie Mac, and loans originated through the U.S. Small Business Administration, U.S. Department of Agriculture Rural Housing Program, and U.S. Department of Veterans Affairs.

For CRA purposes, the bank identified two AAs within the state of Illinois: a portion of the St. Louis MO-IL Metropolitan Statistical Area (MSA) #41180 (St. Louis MSA) and an Illinois non-MSA (IL non-MSA). The AAs conform to regulatory requirements and do not arbitrarily exclude any low- or moderate-income (LMI) geographies.

The bank's last CRA performance evaluation was dated February 6, 2023. Utilizing the Intermediate Small Bank (ISB) examination procedures, the OCC concluded the bank's performance was rated "Satisfactory." There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of Constitution Bank under the ISB performance criteria, which consists of a Lending Test and a Community Development (CD) Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank's record of responding to the CD needs of its AAs through CD lending and providing qualified investments, donations, and services.

The evaluation period for the Lending Test is January 1, 2022 through December 31, 2024. Examiners determined the bank's primary loan products for each AA by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. The primary products within both the St. Louis MSA and IL non-MSA are home mortgages and commercial loans. In January 2026, examiners tested the accuracy of the bank's HMDA data as reported on the Loan Application Register and concluded Constitution Bank's HMDA data was reliable for analysis and conclusions set forth in this CRA performance evaluation. For lending performance, we utilized the comparators of demographic data from the 2020 U.S. Census for the entire evaluation period.

The evaluation period for the CD Test is January 1, 2022 through December 31, 2024. CD loans, qualified investments, and CD services were evaluated in both of the bank's AAs. Qualified investments included investments that met the definition of CD and were made prior to, and remained outstanding through, the

end of the current evaluation period or were made during the current evaluation period. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated 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 based on its performance in the state of Illinois, where both AAs are located.

Refer to the “Scope” section under the state 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 Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans among borrowers of different income levels reflects reasonable penetration.
- The distribution of loans among geographies reflects reasonable penetration.
- The bank demonstrates adequate responsiveness to the community development needs of its AAs.
- There were no complaints with respect to Constitution Bank's CRA performance.

Description of Institution's Operations in Illinois

Examiners assessed performance with Constitution Bank's two AAs in the state of Illinois. The AAs are composed of a portion of the St. Louis MSA and the IL non-MSA. The St. Louis MSA AA consists of Bond, Clinton, Macoupin, and Madison Counties. The AA was comprised of 76 CTs which included four low-income CTs, 30 moderate-income CTs, 30 middle-income CTs, 11 upper-income CTs, and one CT with income not reported for both the 2022 and 2023-2024 analysis periods. The bank operated eight branches within the AA during 2022, including the Mt. Olive location which opened in October 2022, and operated eight branches during 2023-2024 after the Keyesport location closed in June 2022 and the temporary Hamel location opened in February 2024; the three branch adjustments did not affect the AA as the bank continued to operate other locations in Clinton, Madison, and Macoupin counties.

During the 2022 analysis period, the IL non-MSA AA consisted of the whole counties of Effingham, Fayette, and Montgomery and the partial counties of Christian and Shelby. The AA was comprised of 29 CTs which included no low-income CTs, three moderate-income CTs, 21 middle-income CTs, and five upper-income CTs. The bank operated five branches within the AA throughout 2022.

During the 2023-2024 analysis period, the IL non-MSA AA consisted of the whole counties of Effingham, Fayette, and Montgomery. The AA was comprised of 23 CTs which included no low-income CTs, two moderate-income CTs, 16 middle-income CTs, and five upper-income CTs. The bank operated four branches within the AA during the analysis period. However, the Pana location closed in May 2023, and the Altamont location closed in November 2024; by year-end 2024, Constitution Bank operated three locations, including the main office, in the AA.

IL non-MSA

Competition

Constitution Bank had \$247 million in deposits in the IL non-MSA, representing 44.7 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated five branches and ATMs, representing 38.5 percent of total operations. The bank originated approximately \$16.8 million in home mortgage loans within the AA throughout the three-year evaluation period. According to FDIC deposit

market share data, as of June 30, 2024, there were 23 additional FDIC-insured institutions operating 50 branches in the AA. Constitution Bank ranked 7th in deposit market share with 5.5 percent. The top three banks by market share were Midland States Bank with 24.7 percent, Dieterich Bank with 15.1 percent, and Bank & Trust Company with 7.6 percent.

Demographics

The following tables provide a summary of the demographics, including housing, business, and economic information for the IL non-MSA AA.

Assessment Area - 2022 IL Non-MSA AA						
2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	0.00	10.34	72.41	17.24	0.00
Population by Geography	105,876	0.00	9.63	68.94	21.43	0.00
Housing Units by Geography	46,762	0.00	8.55	70.34	21.11	0.00
Owner-Occupied Housing by Geography	32,584	0.00	7.90	68.82	23.28	0.00
Occupied Rental Units by Geography	8,959	0.00	10.31	74.29	15.39	0.00
Vacant Units by Geography	5,219	0.00	9.60	73.08	17.32	0.00
Businesses by Geography	3,449	0.00	7.28	67.03	25.69	0.00
Farms by Geography	462	0.00	3.68	69.48	26.84	0.00
Family Distribution by Income Level	27,085	19.79	16.91	22.74	40.55	0.00
Household Distribution by Income Level	41,543	24.35	14.77	18.28	42.60	0.00
Unemployment rate (%)	3.45	0.00	3.12	3.93	2.21	0.00
Households Below Poverty Level (%)	13.26	0.00	16.84	14.66	7.33	0.00
Median Family Income (Non-MSAs - IL)		\$68,958		Median Housing Value		\$103,800
Median Family Income (Non-MSAs - IL) for 2022		\$76,100		Median Gross Rent		\$616
				Families Below Poverty Level		9.18
FFIEC File - 2020 Census						
2022 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						

Assessment Area - 2023-2024 IL Non-MSA AA						
2023 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.00	8.70	69.57	21.74	0.00
Population by Geography	84,444	0.00	9.05	64.08	26.87	0.00
Housing Units by Geography	37,364	0.00	6.96	66.62	26.42	0.00
Owner-Occupied Housing by Geography	25,938	0.00	7.00	63.75	29.25	0.00
Occupied Rental Units by Geography	7,455	0.00	6.61	74.89	18.50	0.00
Vacant Units by Geography	3,971	0.00	7.38	69.86	22.77	0.00
Businesses by Geography	2,867	0.00	6.91	62.92	30.17	0.00
Farms by Geography	344	0.00	4.65	60.47	34.88	0.00
Family Distribution by Income Level	21,653	19.12	16.58	21.86	42.44	0.00
Household Distribution by Income Level	33,393	24.50	14.35	17.69	43.46	0.00
Unemployment rate (%)	3.62	0.00	4.68	4.17	2.21	0.00
Households Below Poverty Level (%)	14.00	0.00	14.25	16.67	7.33	0.00
Median Family Income (Non-MSAs - IL)		\$67,835		Median Housing Value		\$102,200
Median Family Income (Non-MSAs - IL) for 2024		\$82,800		Median Gross Rent		\$613
				Families Below Poverty Level		9.63
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						

Geographic Distribution of the Population

According to the 2020 U.S. Census data, during the 2022 analysis period, the population in the bank's AA was 105,876 with 10,196 (9.6 percent) of the population residing in moderate-income CTs, 72,991 (68.9 percent) residing in middle-income CTs, and 22,689 (21.4 percent) residing in upper-income CTs. According to the same data, during the 2023-2024 analysis period, the population in the bank's AA was 84,444 with 7,642 (9.1 percent) of the population residing in moderate-income CTs, 54,112 (64.1 percent) residing in middle-income CTs, and 22,690 (26.9 percent) residing in upper-income CTs. There were no low-income CTs within the AA for either analysis period.

Family Distribution by Income Level

According to the 2020 U.S. Census data, during the 2022 analysis period, there were 27,085 families in the AA. The distribution of families by income level was 5,360 (19.8 percent) low income, 4,580 (16.9 percent) moderate income, 6,159 (22.7 percent) middle income, and 10,983 (40.6 percent) upper income. According to the same data, during the 2023-2024 analysis period, there were 21,653 families in the AA. The distribution of families by income level was 4,140 (19.1 percent) low income, 3,590 (16.6 percent) moderate income, 4,733 (21.9 percent) middle income, and 9,190 (42.4 percent) upper income.

Housing Characteristics and Home Affordability

Examiners evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on the 2020 U.S. Census data, the weighted average median family income for the IL non-MSA averaged \$80,400 across the three-year evaluation period. Based on this information, low-income families earned less than \$40,200 and moderate-income families earned less than \$64,320. The median housing value in the AA was \$144,997. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,005 for a low-income borrower and \$1,608 for a moderate-income borrower. Assuming a 30-year mortgage with a 7 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$965. Based on this information, low-income borrowers would likely not be able to afford a mortgage loan in the IL non-MSA when considering the additional expenses associated with home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such, are less likely to have the financial resources to qualify for home or automobile loans than those with income above the poverty rate. Within the IL non-MSA, during the 2022 analysis period, 9.2 percent of families and 13.3 percent of households had incomes below the federal poverty level according to the 2020 U.S. Census data. During the 2023-2024 analysis period, 9.6 percent of families and 14 percent of households had reported income below the federal poverty level.

Employment and Economic Factors

According to Moody's Analytics, *Illinois' economy was expected to underperform the U.S. and the Midwest during 2025. Job growth was expected to proceed around the same pace as 2024. Protectionist trade policy presented numerous obstacles to key industries. In the long term, population loss and weak public finances were expected to keep Illinois behind the nation.*

Major employment sectors in the IL non-MSA included education and health services, professional and business services, and government. Major employers throughout the AA include Taylorville Memorial Hospital in Christian County, Heartland Dental and HSHS St. Anthony's Hospital in Effingham County, Fayette County Hospital and Vandalia Correctional Center in Fayette County, Graham Correctional Center and Hillsboro Health in Montgomery County, and HSHS Good Shepherd Hospital in Shelby County.

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, unemployment rates in the IL non-MSA averaged 4.3 percent across all three years of the evaluation period, with yearly averages in from 3.3 percent in 2022 to 5.1 percent in 2024 throughout the AA.

Community Contacts

Examiners relied on information from three community contacts made during the evaluation period with organizations located throughout the IL non-MSA. The organizations focus on areas such as housing and economic development, and the contacts identified affordable housing and financial education as the primary needs of the community.

St. Louis MSA

Competition

Constitution Bank had \$305.8 million in deposits in the St. Louis MSA, representing 55.3 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated eight branches and ATMs, representing 61.5 percent of total operations. The bank originated approximately \$48.7 million in home mortgage loans within the AA throughout the three-year evaluation period. According to FDIC deposit market share data, as of June 30, 2024, there were 40 additional FDIC-insured institutions operating 122 branches in the AA. Constitution Bank ranked 12th in deposit market share with 3.2 percent. The top three banks by market share were FCB Banks with 15.3 percent, Busey Bank with 11.5 percent, and U.S. Bank National Association with 8.1 percent.

Demographics

The following tables provide a summary of the demographics, including housing, business, and economic information for the St. Louis MSA AA.

Assessment Area(s) - 2022 St. Louis MSA AA						
2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	4.49	38.20	42.70	13.48	1.12
Population by Geography	364,450	2.40	31.93	44.02	21.02	0.63
Housing Units by Geography	164,614	3.08	34.58	44.15	17.26	0.92
Owner-Occupied Housing by Geography	108,693	1.96	30.29	47.59	19.59	0.57
Occupied Rental Units by Geography	39,268	4.70	41.59	38.03	14.29	1.39
Vacant Units by Geography	16,653	6.59	46.06	36.12	9.13	2.10
Businesses by Geography	9,948	2.63	28.42	44.22	23.27	1.46
Farms by Geography	756	0.93	20.50	57.67	20.63	0.26
Family Distribution by Income Level	96,979	22.76	18.98	22.13	36.13	0.00
Household Distribution by Income Level	147,961	25.85	15.93	19.41	38.82	0.00
Unemployment rate (%)	5.09	11.92	6.15	4.44	4.15	5.65
Households Below Poverty Level (%)	11.92	29.51	15.95	9.20	7.21	45.94
Median Family Income (41180 - St. Louis, MO-IL MSA)		\$84,758	Median Housing Value			\$124,000
Median Family Income (41180 - St. Louis, MO-IL MSA) for 2022		\$96,800	Median Gross Rent			\$800
			Families Below Poverty Level			8.16
FFIEC File - 2020 Census						
2022 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						

Assessment Area(s) – 2023-2024 St. Louis MSA AA						
2023 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	4.49	38.20	42.70	13.48	1.12
Population by Geography	364,450	2.40	31.93	44.02	21.02	0.63
Housing Units by Geography	164,614	3.08	34.58	44.15	17.26	0.92
Owner-Occupied Housing by Geography	108,693	1.96	30.29	47.59	19.59	0.57
Occupied Rental Units by Geography	39,268	4.70	41.59	38.03	14.29	1.39
Vacant Units by Geography	16,653	6.59	46.06	36.12	9.13	2.10
Businesses by Geography	10,512	2.49	30.41	43.74	22.05	1.30
Farms by Geography	819	0.85	22.59	56.41	19.90	0.24
Family Distribution by Income Level	96,979	22.76	18.98	22.13	36.13	0.00
Household Distribution by Income Level	147,961	25.85	15.93	19.41	38.82	0.00
Unemployment rate (%)	5.09	11.92	6.15	4.44	4.15	5.65
Households Below Poverty Level (%)	11.92	29.51	15.95	9.20	7.21	45.94
Median Family Income (41180 - St. Louis, MO-IL MSA)		\$84,758	Median Housing Value			\$124,000
Median Family Income (41180 - St. Louis, MO-IL MSA) for 2024		\$103,200	Median Gross Rent			\$800
			Families Below Poverty Level			8.16
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						

Geographic Distribution of the Population

According to the 2020 U.S. Census data, during both analysis periods, the population in the bank's AA was 364,450 with 8,747 (2.4 percent) of the population residing in low-income CTs, 116,369 (31.9 percent) residing in moderate-income CTs, 160,431 (44 percent) residing in middle-income CTs, 76,607 (21 percent) residing in upper-income CTs, and 2,26 (0.6 percent) residing in CTs with income not reported.

Family Distribution by Income Level

According to the 2020 U.S. Census data, during both analysis periods, there were 96,979 families in the AA. The distribution of families by income level was 22,072 (22.8 percent) low income, 18,407 (19 percent) moderate income, 21,461 (22.1 percent) middle income, and 35,039 (36.1 percent) upper income.

Housing Characteristics and Home Affordability

Examiners evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on the 2020 U.S. Census data, the weighted average median family income for the St. Louis MSA averaged \$100,267 across the 3-year evaluation period. Based on this information, low-income families earned less than \$50,133 and moderate-income families earned less than \$80,213. The median housing value in the AA was \$277,450. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,253 for a low-income borrower and \$2,005 for a moderate-income borrower. Assuming a 30-year mortgage with a 7 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,846. Based on this information, low-income borrowers would likely not be able to afford a mortgage loan in the St. Louis MSA when considering the additional expenses associated with home ownership.

The poverty level across the AA was also considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such, are less likely to have the financial resources to qualify for home mortgages than those with income above the poverty rate. Within the St. Louis MSA, during both analysis periods, 8.2 percent of families and 11.9 percent of households had incomes below the federal poverty level according to the 2020 U.S. Census data.

Employment and Economic Factors

According to Moody's Analytics, St. Louis' economy was expected to underperform in 2025 before growing slightly quicker than the rest of the Midwest. Financial activities were expected to benefit from robust health insurance demand. Auto and aerospace manufacturers were projected to forge ahead as downside risks rose. Within the longer term, the weak population trends were expected to limit St. Louis' potential, with growth around the Midwest average.

Major employment sectors in the St. Louis MSA include education and health services, professional and business services, leisure and hospitality services, and government. Major employers in the bank's area include Mallinckrodt Pharmaceuticals and Greenville University in Bond County, HSHS St. Joseph's Hospital in Clinton County, Amazon and Southern Illinois University-Edwardsville in Madison County, and Blackburn College and Community Hospital of Staunton in Macoupin County.

According to the U.S. Department of Labor, BLS report, unemployment rates in the St. Louis MSA averaged 4.1 percent across all three years of the evaluation period, with yearly averages increasing from 3.3 percent in 2022 to 4.6 percent in 2024 throughout the AA. The Illinois state unemployment rate averaged 4.7 percent across the same three years, with yearly averages increasing from 4.6 percent in 2022 to 5 percent in 2024.

Community Contacts

Examiners relied on information from two community contacts made during the evaluation period with organizations located throughout the St. Louis MSA. The organizations contacted focus on areas such as housing and economic development and financial assistance to promote small businesses. The contacts identified affordable housing as the primary need of the community.

Scope of Evaluation in Illinois

Examiners completed a full-scope review for both the IL non-MSA and St. Louis MSA AAs during this performance evaluation. Examiners placed more weight on performance within the St. Louis MSA, given this AA contains 62 percent of remaining bank branches and approximately 55 percent of total bank deposits. Refer to Appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Illinois was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table 7 in the state of Illinois 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.

The overall geographic distribution of home mortgage loans is reasonable.

IL non-MSA

The geographic distribution of home mortgage loans throughout the IL non-MSA is reasonable.

2022

The geographic distribution of home mortgage loans was excellent. The proportion of the bank's home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies. There were no low-income geographies within this AA.

2023-2024

The geographic distribution of home mortgage loans was poor. The proportion of the bank's home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies. There were no low-income geographies within this AA.

St. Louis MSA

The geographic distribution of home mortgage loans throughout the St. Louis MSA is reasonable.

2022

The geographic distribution of home mortgage loans was excellent. The proportion of the bank's home mortgage loans in low-income geographies was near to the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies. The proportion of the bank's home mortgage loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies.

2023-2024

The geographic distribution of home mortgage loans was reasonable. The proportion of the bank's home mortgage loans in low-income geographies was near to the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies. The proportion of the bank's home mortgage loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Illinois 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.

The overall geographic distribution of small loans to businesses is excellent.

IL non-MSA

The geographic distribution of small loans to businesses throughout the IL non-MSA is excellent.

2022

The geographic distribution of small loans to businesses was excellent. The proportion of the bank's small loans to businesses in moderate-income geographies exceeded the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies. There were no low-income CTs in the AA.

2023-2024

The geographic distribution of small loans to businesses was excellent. The proportion of the bank's small loans to businesses in moderate-income geographies exceeded the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies. There were no low-income CTs in the AA.

St. Louis MSA

The geographic distribution of small loans to businesses throughout the St. Louis MSA is reasonable.

2022

The geographic distribution of small loans to businesses was reasonable. The proportion of the bank's small loans to businesses in low-income geographies was below the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies. The proportion of the bank's small loans to businesses in moderate-income geographies exceeded the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies.

2023-2024

The geographic distribution of small loans to businesses was reasonable. The proportion of the bank's small loans to businesses in low-income geographies was below the percentage of businesses and the aggregate industry distribution of small loans to businesses in those geographies. The proportion of the bank's small loans to businesses in moderate-income geographies aligned with the percentage of businesses and exceeded the aggregate industry distribution of small loans to businesses in those geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage data. We did not find any unexplained conspicuous gaps in lending.

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.

Home Mortgage Loans

Refer to Table 8 in the state of Illinois 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 borrower distribution of home mortgage loans is reasonable.

When determining the reasonableness of the bank's performance to individuals of different income levels, examiners considered housing costs in relation to the median family incomes in the AAs, which limited the affordability for LMI families.

IL non-MSA

The borrower distribution of home mortgage loans throughout the IL non-MSA is reasonable.

2022

The borrower distribution of home mortgage loans was reasonable. The proportion of the bank's home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families but was below the aggregate industry distribution of home mortgage loans to those borrowers.

2023-2024

The borrower distribution of home mortgage loans was excellent. The proportion of the bank's home mortgage loans to low-income borrowers exceeded the percentage of low-income families and the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers.

St. Louis MSA

The borrower distribution of home mortgage loans throughout the St. Louis MSA is reasonable.

2022

The borrower distribution of home mortgage loans was excellent. The proportion of the bank's home mortgage loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

2023-2024

The borrower distribution of home mortgage loans was reasonable. The proportion of the bank's home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families but was below the aggregate industry distribution of home mortgage loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Illinois 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 borrower distribution of small loans to businesses was reasonable.

IL non-MSA

The borrower distribution of small loans to businesses throughout the IL non-MSA is reasonable.

2022

The borrower distribution of small loans to businesses was reasonable. The proportion of the bank's loans to businesses with revenues less than \$1 million was below the percentage of businesses but exceeded the aggregate industry distribution of loans to those businesses.

2023-2024

The borrower distribution of small loans to businesses was excellent. The proportion of the bank's loans to businesses with revenues less than \$1 million exceeded the percentage of businesses and significantly exceeded the aggregate industry distribution of loans to those businesses.

St. Louis MSA

The borrower distribution of small loans to businesses throughout the St. Louis MSA is excellent.

2022

The borrower distribution of small loans to businesses was reasonable. The proportion of the bank's loans to businesses with revenues less than \$1 million was below the percentage of businesses and significantly exceeded the aggregate industry distribution of loans to those businesses.

2023-2024

The borrower distribution of small loans to businesses was excellent. The proportion of the bank's loans to businesses with revenues less than \$1 million aligned with the percentage of businesses and significantly exceeded the aggregate industry distribution of loans to those businesses.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

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

To provide perspective regarding the relative level of qualified CD loans and qualified investments, we allocated a portion of the bank's common equity tier 1 capital to each AA based on the percentage of the bank's deposits located in the respective AA as a means of comparative analysis. During the evaluation period, CD activities in the IL non-MSA totaled approximately \$56,600 and represent 0.2 percent of the AA allocated common equity tier 1 capital (\$26.4 million) as of December 31, 2024. CD activities in the St. Louis MSA totaled approximately \$4.7 million and represent 14.2 percent of the AA allocated common equity tier 1 capital (\$33.5 million) as of December 31, 2024.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews of both AAs, 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 CD 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 \$
IL non-MSA	-	-	-	-
St. Louis MSA	18	100.00	4,736	100.00
Total	18	100.00	4,736	100.00

IL non-MSA

The bank did not provide any loans during the three-year evaluation period that would qualify for community development consideration.

St. Louis MSA

The bank provided 18 loans originated during the three-year evaluation period totaling \$4.7 million.

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank originated eight loans totaling \$4.2 million for the purchase or refinance of multifamily rental properties providing affordable housing for LMI residents throughout the AA.

- The bank originated 10 loans totaling \$159,314 for various community service purposes to a low-income school district within the AA where 53.8 percent of the student body qualifies for free and/or reduced lunches.

Number and Amount of Qualified Investments

The Qualified Investment table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments. This table includes all qualified CD investments, including prior period investments that remain outstanding in the bank's investment portfolio at the end of the evaluation period.

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)
IL non-MSA	1	50	55	7	56	70.00	57	91.90	-	-
St. Louis MSA	-	-	24	5	24	30.00	5	8.10	-	-
Broader Statewide or Regional Area	-	-	-	-	-	-	-	-	-	-
Total	1	50	79	12	80	100.00	62	100.00	-	-

IL non-MSA

The bank retained one public welfare investment from a prior period totaling \$50,000 to a local community development corporation. These funds are utilized to assist LMI families seeking affordable housing. Additionally, the bank made 55 donations, totaling approximately \$6,600 to various organizations that provided community services targeted to LMI individuals and families in the AA during the evaluation period. Services provided by these organizations primarily include food donations and educational and social outreach.

St. Louis MSA

The bank did not provide any investments during the three-year evaluation period that would qualify for CD consideration. However, the bank made 24 donations, totaling approximately \$5,000 to various organizations that provided community services targeted to LMI individuals and families in the AA during the evaluation period. Services provided by these organizations primarily include food donations and educational outreach.

Extent to Which the Bank Provides Community Development Services

IL non-MSA

Seven bank employees provided a total of 287 hours of financial expertise across six different local qualifying organizations that provide community services to LMI individuals and families and support economic development. The following is an example of donations the bank made in the AA:

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

- Constitution Bank donated \$5,100 to a local CEO school program which provides financial and small business knowledge to local students to encourage economic development.

St. Louis MSA

Three bank employees provided a total of 41 hours of financial expertise across five different local qualifying organizations that provide community services to LMI individuals and families and support economic development. The following is an example of donations the bank made in the AA:

- Constitution Bank donated \$665 between two local low-income school districts with more than 50 percent of the student body qualifying for free and/or reduced lunches.

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 and small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		None.
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
IL non-MSA	Full-scope	Effingham, Montgomery, and Fayette counties (2022-2024) Portions of Christian & Shelby counties (2022)
St. Louis MSA (IL portion only)	Full-scope	Bond, Clinton, Macoupin, and Madison counties (2022-2024)

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Constitution Bank, N.A.	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Illinois	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
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
2022 IL Non-MSA AA	56	7,113	29.02	1,474	--	--	--	7.90	16.07	9.02	68.82	73.21	66.82	23.28	10.71	24.15	--	--	--
2022 St. Louis MSA AA	137	16,131	70.98	10,923	1.96	0.73	1.46	30.29	53.28	28.46	47.59	35.04	47.16	19.59	10.95	22.52	0.57	--	0.40
Total	193	23,244	100.00	12,397	1.50	0.52	1.28	25.13	42.49	26.15	52.49	46.11	49.50	20.44	10.88	22.72	0.44	--	0.35
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 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	
2024 IL Non-MSA AA	79	9,683	27.92	1,994	--	--	--	7.00	3.80	10.98	63.75	84.81	62.34	29.25	11.39	26.68	--	--	--	
2024 St. Louis MSA AA	204	32,531	72.08	18,157	1.96	0.49	1.45	30.29	50.98	29.12	47.59	37.75	46.44	19.59	10.78	22.55	0.57	--	0.41	
Total	283	42,214	100.00	20,151	1.58	0.35	1.31	25.80	37.81	27.33	50.71	50.88	48.02	21.45	10.95	22.96	0.46	--	0.37	
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 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
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
2022 IL Non-MSA AA	56	7,113	29.02	1,474	19.79	14.29	11.87	16.91	17.86	22.12	22.74	21.43	22.93	40.55	39.29	27.27	--	7.14	15.81
2022 St. Louis MSA AA	137	16,131	70.98	10,923	22.76	21.17	17.03	18.98	26.28	22.70	22.13	19.71	20.10	36.13	16.06	22.14	--	16.79	18.04
Total	193	23,244	100.00	12,397	22.11	19.17	16.42	18.53	23.83	22.63	22.26	20.21	20.44	37.10	22.80	22.75	--	13.99	17.77
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 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																			2023 - 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
2024 IL Non-MSA AA	79	9,683	27.92	1,994	19.12	21.52	10.83	16.58	31.65	21.51	21.86	26.58	24.02	42.44	16.46	26.93	--	3.80	16.70
2024 St. Louis MSA AA	204	32,531	72.08	18,157	22.76	18.63	15.87	18.98	20.59	23.11	22.13	15.20	19.20	36.13	21.57	24.57	--	24.02	17.24
Total	283	42,214	100.00	20,151	22.09	19.43	15.37	18.54	23.67	22.95	22.08	18.37	19.68	37.28	20.14	24.81	--	18.37	17.19
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 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
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
2022 IL Non-MSA AA	15	9,669	42.86	1,152	--	--	--	7.28	13.33	6.60	67.03	73.33	63.80	25.69	13.33	29.60	--	--	--
2022 St. Louis MSA AA	20	6,553	57.14	6,060	2.63	0.00	2.51	28.42	35.00	26.91	44.22	40.00	43.80	23.27	25.00	25.99	1.46	0.00	0.79
Total	35	16,222	100.00	7,212	1.96	0.00	2.11	22.98	25.71	23.67	50.09	54.29	46.99	23.89	20.00	26.57	1.08	0.00	0.67
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 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																			2023 - 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
IL Non-MSA AA	40	14,835	50.00	1,673	--	--	--	6.91	15.00	4.60	62.92	65.00	63.24	30.17	20.00	32.16	--	--	--
St. Louis MSA AA	40	19,637	50.00	11,127	2.49	0.00	1.57	30.41	30.00	26.92	43.74	35.00	43.35	22.05	35.00	27.55	1.30	0.00	0.61
Total	80	34,472	100.00	12,800	1.96	0.00	1.37	25.38	22.50	24.00	47.85	50.00	45.95	23.79	27.50	28.16	1.02	0.00	0.53

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 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
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	
2022 IL Non-MSA AA	15	9,669	42.86	1,152	77.24	60.00	48.09	5.97	40.00	16.79	0.00	
2022 St. Louis MSA AA	20	6,553	57.14	6,060	80.60	75.00	54.77	4.98	25.00	14.43	0.00	
Total	35	16,222	100.00	7,212	79.73	68.57	53.70	5.23	31.43	15.03	0.00	
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 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											2023 - 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
IL Non-MSA AA	40	14,835	50.00	1,673	77.47	80.00	50.03	5.48	20.00	17.06	0.00
St. Louis MSA AA	40	19,637	50.00	11,127	81.44	80.00	56.65	4.40	20.00	14.16	0.00
Total	80	34,472	100.00	12,800	80.59	80.00	55.79	4.63	20.00	14.78	0.00

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%