



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

February 17, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Edison National Bank
Charter Number: 23329

13000 South Cleveland Avenue
Fort Myers, Florida 33907

Office of the Comptroller of the Currency

4042 Park Oaks Blvd, Suite 240
Tampa, FL 33610

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 rating is based on:

- A substantial majority of the bank's loans were inside its assessment area (AA).
- The bank exhibited reasonable geographic distribution of loans in the AA.
- The bank exhibited a reasonable distribution of loans to individuals and businesses of different income levels in the AA.

The Community Development (CD) Test rating is based on:

- The bank exhibited adequate responsiveness to community development needs in the AA through qualified loans, investments, and community development services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio was less than reasonable.

The bank's quarterly average loan-to-deposit ratio (12 quarters from the first quarter of 2022 to the fourth quarter of 2024) of 36.10 percent. During this period, Edison's ratio was significantly lower than a similarly situated bank operating in the bank's assessment area, which averaged 70.29 percent.

Lending in Assessment Area

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

The bank originated 92.82 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	45	91.84	4	8.16	49	32,088	95.81	1,404	4.19	33,492
Small Business	80	93.02	6	6.98	86	47,625	92.10	4,084	7.90	51,709
Consumer	43	93.48	3	6.52	46	9,135	94.41	541	5.59	9,676
Total	168	92.82	13	7.18	181	88,848	93.65	6,020	6.35	94,877

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

Description of Institution

Edison National Bank (Edison or the bank) is a single-state community bank headquartered in Fort Myers, Florida. The bank is wholly owned by Edison Bancshares, Inc., a one-bank holding company with \$41.8 million in assets. The bank was chartered in 1997 and is the oldest locally owned and chartered community bank in the Cape Coral-Fort Myers, FL AA. The bank operates four offices in the assessment area: two in Fort Myers, FL, one in Sanibel, FL, and one in Captiva, FL with ATMs located on site at the Edison National Bank River District office, at the Sanibel & Captiva Bank of the Islands offices, and at all Publix Super Market locations through the Presto system. Lee County, Florida is part of the Cape Coral- Fort Myers MSA. The bank did not open or close any offices since the last CRA evaluation.

The bank offers generic lending and deposit products and does not offer non-conforming lending products. Products offered include one-to-four family residential home mortgages, construction, open and closed revolving lines of credit, commercial and industrial loans, consumer loans, and interest-bearing and non-interest-bearing deposit products. As of December 31, 2024, the bank reported total assets of \$426.5 million and tier one capital of \$37.7 million. Net loans were \$157.0 million representing 36.8 percent of total assets. Business loans represented 23.6 percent of net loans, loans secured by residential real estate represented 57.2 percent, and 5.4 percent in consumer loans. The bank's primary lending focus remains small business and real estate lending.

There were no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its assessment area. The bank received a "Satisfactory" rating in its previous CRA evaluation dated April 11, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Intermediate Small Bank procedures, which includes a lending test and CD test. The evaluation period is from January 1, 2022, to December 31, 2024. There was a total of 168 loans totaling \$88 million, of which 47.6 percent was centered in small business loans, 26.8 percent in home mortgage loans, and 25.6 percent in consumer loans. Based on this data, we determined the primary loan product during the evaluation period was small business lending. In order to assess the bank's overall lending performance, we included home mortgage and consumer loans in our analysis. Overall lending performance is based on the total number of loan originations with a greater emphasis placed on small business loans. Less emphasis was given to home mortgage and consumer lending as these are considered secondary products. The level of home mortgage and consumer lending was hampered by the challenges facing the AA during the evaluation period, which include hurricanes experienced in the area.

The OCC compared bank loan data for all applicable years in the Cape Coral-Fort Myers MSA and the State of Florida rating area to demographic data using the 2024 U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted 2024 MSA median family income and 2024 Dunn and Bradstreet (D&B) small business demographic data. Examiners also evaluated loans, community services, and qualified investments in the form of donations to organizations.

Selection of Areas for Full-Scope Review

The Cape Coral-Fort Myers, FL, AA was selected for a full-scope review. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected.

Ratings

The bank’s overall rating is based on the lending performance in the state of Florida. Refer to the “Scope” section under each 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 Florida

CRA rating for the State of Florida¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A substantial majority of loans were made in the bank's AA.
- The bank exhibited reasonable geographic distribution of loans in the state.
- The bank exhibited a reasonable distribution of loans to individuals and businesses of different income levels in the state.
- The bank exhibited adequate responsiveness to community development needs in the state.

Description of Institution's Operations in Florida

According to the 2024 FDIC Deposit Market Share Report for the Cape-Coral-Fort Myers AA, Edison is ranked 14 out of 33 institutions in the AA with \$373.6 million in deposits or 1.6 percent market share. All deposits are in the bank's assessment area. Top five banks in the area are Wells Fargo Bank, Bank of America NA, Truist Bank, Fifth Third Bank NA, and JPMorgan Chase Bank NA with a combined market share of 58.24 percent. Of the bank's four full-service branches, two branches are located in middle-income geographies and two are located in upper-income geographies.

Per the 2024 HMDA Market Share report, Edison bank ranks 191 out of 831 banks in loans purchased and/or originated in the Cape Coral-Fort Myers AA. The bank originated 14 home mortgage loans totaling \$9.9 million, for a market share of 0.1 percent.

Economic Factors

According to data from Moody's Analytics report, Cape Coral-Fort Myers' economy experienced a downturn during the evaluation period. The AA was impacted by three hurricanes (Helene, Milton, and Ian) resulting in significant property damage. Property remediation was hampered by slow insurance payouts and government assistance. Lending opportunities were limited as many damaged properties were purchased for cash by investors.

While unemployment remained relatively low during the evaluation period, inflation heavily impacted the affordability of housing and consumer goods in the AA. The economy in the AA is driven by healthcare and retail. Top employers include Lee Memorial Health System, Publix Supermarkets, Inc, Chico's FAS Inc, Paramount Residential Mortgage Group, and Walmart, Inc.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Cape Coral-Fort Myers AA was 3.9 percent in January 2022 and 3.3 percent in December 2024, compared to Florida unemployment rates of 3.7 percent and 3.2 percent, respectively. The poverty level across the AA was considered in the evaluation of the bank's 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 loans than those with income above the poverty rate. Within the Cape Coral-Fort Myers AA, 11.0 percent of families had incomes below the Federal Poverty Level.

Housing Affordability

The OCC conducted an affordability analysis for the bank's AA. The goal was to determine if either low- or moderate-income (LMI) borrowers could reasonably afford a home mortgage loan in the AA. To determine affordability, the OCC used home sales prices and median family income to estimate mortgage payments based on a six percent mortgage interest rate with a 30-year loan amortization. The analysis concluded that home mortgages were unaffordable if the principal and interest payment exceeded 30 percent of the AA's calculated debt-to-income ratio. This information was used as performance context in the borrower distribution of home mortgage loans.

Assuming a 30-year mortgage with a six percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$44,400 per year (or less than 50 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$185,139 mortgage with a payment of \$1,110 per month. A moderate-income borrower making \$71,040 per year (or less than 80 percent of the 2024 FFIEC adjusted median family income in the AA) could afford a \$296,222 mortgage with a payment of \$1,776 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$2,342. The median housing value in the AA exceeded \$400,000 during the evaluation period according to Realtor.com data.

Community Contacts

The OCC made one community contact during the evaluation period with an organization serving the AA. This organization focuses on business assistance to retain existing businesses, encourage entrepreneurship, and works to improve opportunities for the workforce to advance skills and have access to career ladders. Community contact indicated the following are needs within the bank's AA:

- Community development,
- Other credit-related projects, or financing programs,
- Level of opportunity for bank involvement.
- Support from banks to build the capacity of the new Community Development Corporation will be needed.

Cape Coral-Fort Myers AA

Assessment Area(s) - Cape Coral-Fort Myers AA 2024						
2022-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	223	2.24	21.52	44.39	29.60	2.24
Population by Geography	760,822	2.3	23.68	46.74	26.44	0.84

Assessment Area(s) - Cape Coral-Fort Myers AA 2024						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Housing Units by Geography	401,252	1.72	20.31	44.92	32.19	0.86
Owner-Occupied Housing by Geography	209,905	0.95	17.11	49.59	32.11	0.24
Occupied Rental Units by Geography	79,011	4.65	36.54	40.31	18.13	0.36
Vacant Units by Geography	112,336	1.08	14.87	39.44	42.25	2.36
Businesses by Geography	49,447	2.48	24.30	44.18	28.41	0.63
Farms by Geography	1,920	2.29	24.27	46.67	26.67	0.10
Family Distribution by Income Level	187,877	19.27	18.96	20.85	40.92	0.00
Household Distribution by Income Level	288,916	22.34	17.02	19.25	41.40	0.00
Unemployment rate (%)	4.95	9.5	6.09	4.80	3.42	6.53
Households Below Poverty Level (%)	11.2	30.02	19.50	9.11	6.77	13.55
Median Family Income (15980 - Cape Coral-Fort Myers, FL AA)		\$71,043			Median Housing Value	\$224,900
Median Family Income (15980 - Cape Coral-Fort Myers, FL AA) for 2024		\$88,800			Median Gross Rent	\$1,250
					Families Below Poverty Level	7.94
FFIEC File - 2020 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 Florida

The Cape Coral-Fort Myers AA includes all of Lee County in Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table 7 in the state of Florida 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.

Overall, the geographic distribution of home mortgage loans reflects poor distribution of loans in the AA's LMI CTs. The geographic distribution of home mortgage loans in low-income geographies was well below the aggregate data and the percentage of owner-occupied housing units. There were no loans in low-income geographies. The demographic and aggregate lending data indicate limited lending opportunities in low-income geographies. The geographic distribution of home mortgage loans in moderate-income geographies was near the aggregate data but below the percentage of owner-occupied housing units. Although there are some lending opportunities in LMI geographies, the cost of repairs

associated with storm-damaged homes presented affordability challenges during the evaluation period. Furthermore, the Federal Housing Finance Agency reported that the home price index surged during 2022, increasing to 29.4 percent compared to just 5.4 percent in 2020 and 5.2 percent in 2023.

Small Loans to Businesses

Refer to Table 9 in the state of Florida 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 geographic distribution of loans to small businesses geographies in the AA is reasonable. The geographic distribution of small business loans in low-income geographies exceeded the aggregate and percentage of businesses. The geographic distribution of small business loans in moderate-income geographies was near to the aggregate and percentage of businesses.

Consumer Loans

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

The geographic distribution of loans to LMI geographies in the AA is reasonable. The geographic distribution of consumer loans in low-income geographies exceeded the percentage of low-income households. The geographic distribution of consumer loans in moderate-income geographies was below the percentage of moderate-income households.

Lending Gap Analysis

No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank exhibited a poor distribution of home mortgage loans to individuals of different income levels given the product lines offered by the bank. The distribution of home mortgage loans to low-income borrowers was well below the aggregate data and percentage of low-income families. There were no loans to low-income borrowers. Distribution of home mortgage loans to moderate-income borrowers was below the aggregate data and the percentage of moderate-income borrowers. As stated above, affordability in the AA during the evaluation period was a challenge.

Small Loans to Businesses

Refer to Table 10 in the state of Florida 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 bank exhibited reasonable distribution of loans to small businesses in the AA. Small business loan distribution to businesses with less than \$1 million in gross annual revenues exceeded the percentage aggregate of small businesses but was below the percentage of small businesses.

Consumer Loans

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

The bank exhibited reasonable distribution of consumer loans to individuals of different income levels. The distribution of loans to low-income individuals exceeded the percentage of low-income households. The loan distribution to moderate-income individuals was below the percentage of moderate-income households.

Responses to Complaints

There were no CRA related complaints made during the review period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cape Coral - Fort Myers MSA	2	100	405	100
Totals	2	100	405	100

The level and responsiveness of CD loans in the full-scope AAs is adequate given the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. The bank originated two loans totaling \$405 thousand, which represented 1.07 percent of allocated tier 1 capital, in the AA during the review period. These loans provided affordable housing in the AA.

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

- A \$309,270 mortgage to finance an affordable housing duplex in an LMI CT.
- A \$96,000 mortgage on affordable housing property on leased land.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cape Coral-Fort Myers MSA	0	0	61	131	61	100.00	131	100.00		
Total	0	0	61	131	61	100.00	131	100.00		

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

Qualified investments are for affordable housing and credit needs in the AA. The bank made a number of grants and donations to many local CD nonprofit organizations to support affordable housing initiatives as well as community services targeted to LMI individuals and families.

Qualified investments in the form of donations to organizations in the AA totaled \$131,446 and represented 0.35 percent of allocated tier 1 capital.

Examples of qualified investments include,

- Donations of \$22,660 to Friends in Service Here which offers services for SNAP, Medicaid, VITA tax preparation and financial counseling for low-income individuals.
- Donations of \$7,000 to Community Housing Resources which provide safe, quality, affordable housing for families and individuals with below market rate housing income limits.

Extent to Which the Bank Provides Community Development Services

Community development services totaled 531 hours of financial literacy sessions in the AA. Bank directors provided 402 hours of services in the community during the review period. This benefited about 20 different organizations serving the communities in AA. Thirty-four employees also provided 129 hours of literacy learning sessions to low-moderate income children in the community.

Examples of community development services performed include:

- 402 hours financial education to LMI students at various schools and community events.
- 129 hours of financial literacy sessions to LMI income children.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, consumer loans qualified community investment loans and investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Florida		
Cape Coral-Fort Myers MSA	Full-scope	Lee County

Appendix B: Summary of State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank Rating
Edison National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Florida	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 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Cape Coral-Fort Myers MSA	45	32,088	100.00	89,956	0.95	--	0.89	17.11	8.89	21.00	49.59	31.11	50.64	32.11	57.78	27.05	0.24	2.22	0.40
Total	45	32,088	100.00	89,956	0.95	--	0.89	17.11	8.89	21.00	49.59	31.11	50.64	32.11	57.78	27.05	0.24	2.22	0.40
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cape Coral-Fort Myers MSA	45	32,088	100.00	89,956	19.27	--	3.92	18.96	4.44	12.92	20.85	2.22	21.98	40.92	77.78	40.94	--	15.56	20.24
Total	45	32,088	100.00	89,956	19.27	--	3.92	18.96	4.44	12.92	20.85	2.22	21.98	40.92	77.78	40.94	--	15.56	20.24
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cape Coral-Fort Myers MSA	80	47,625	100.00	87,939	2.48	2.50	1.73	24.30	21.25	22.01	44.18	30.00	47.39	28.41	45.00	28.42	0.63	1.25	0.44
Total	80	47,625	100.00	87,939	2.48	2.50	1.73	24.30	21.25	22.01	44.18	30.00	47.39	28.41	45.00	28.42	0.63	1.25	0.44

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cape Coral-Fort Myers MSA	80	47,625	100.00	87,939	90.24	76.25	53.29	2.32	20.00	7.45	3.75
Total	80	47,625	100.00	87,939	90.24	76.25	53.29	2.32	20.00	7.45	3.75

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

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2022 - 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
Cape Coral-Fort Myers AA	43	9,135	100.00	1.96	2.33	22.42	18.60	47.06	32.55	28.29	46.51	0.27	--
Total	43	9,135	100.00	1.96	2.33	22.42	18.60	47.06	32.55	28.29	46.51	0.27	--
Source: FFIEC File - 2020 Census; 1/1/2022 - 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 - 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
Cape Coral-Fort Myers MSA	43	9,135	100.00	22.34	27.90	17.02	9.30	19.25	4.65	41.40	51.16	--	6.97
Total	43	9,135	100.00	22.34	27.90	17.02	9.30	19.25	4.65	41.40	51.16	--	6.97
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													