

PUBLIC DISCLOSURE

April 15, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Central Bank
RSSD # 31255
11201 Clay Road
Houston, Texas 77041

Federal Reserve Bank of Dallas
2200 North Pearl Street
Dallas, Texas 75201

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, nor should it 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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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**.

The Lending Test is rated: **Satisfactory**.

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

Central Bank (Central or bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending Test and Community Development (CD) Test:

- The bank's 13-quarter average net loan-to-deposit ratio (NLTD) is reasonable given the bank's asset size, financial condition, and credit needs of the sole delineated assessment area (AA), Houston Metropolitan AA.
- A majority of the bank's loans are originated inside Central's AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- CD activity reflects adequate responsiveness to the needs of the AA.

SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. Examiners considered the bank's asset size; financial condition; business strategy; major loan products; market competition; demographic and economic characteristics of the Houston Metropolitan AA; and the credit and CD needs of the communities served. Examiners determined Central's major loan products consist of commercial and residential real estate loans. In alignment with the bank's strategy, small business lending exceeded the volume of Home Mortgage Disclosure Act (HMDA) loans; therefore, small business lending carried more weight when assessing the bank's CRA performance.

To evaluate the Central's CRA performance, examiners reviewed the following data:

- The bank's 13-quarter average NLTD ratio in comparison to the ratios of three similarly situated financial institutions.
- A statistically derived sample of 103 small business loans out of a universe of 211 originated between January 1, 2023, and December 31, 2023.
- The bank's HMDA loans originated between January 1, 2022, and December 31, 2022.
- Qualified CD loans and services extended since the November 9, 2020, performance evaluation.
- Qualified CD investments held by the bank since the prior performance evaluation.
- Information provided by two community members serving the Houston Metropolitan AA to further assess the credit and CD needs, local economic conditions, and the responsiveness of banks in meeting such needs.

DESCRIPTION OF THE INSTITUTION

Central, an intrastate bank headquartered in Houston, Texas, has the following characteristics.

- The bank is a wholly owned subsidiary of Central Bancshares, Inc., a single bank holding company.
- Central has total assets of \$1.1 billion as of December 31, 2023.
- The bank operates four full-service branches in the Houston Metropolitan AA, with each branch consisting of a lobby, drive-through, and deposit-taking automatic teller machine (ATM).
- Central’s primary business focus is commercial and residential real estate lending. As shown in the Table 1, these loan products represent 88.1 percent of the total loan portfolio.

Table 1

Composition of Loan Portfolio as of December 31, 2023		
Loan Type	\$(000)	%
Agricultural	1,032	0.1
Commercial	485,718	55.3
Consumer	31,843	3.6
Residential Real Estate	287,733	32.8
Other	73,119	8.3
Gross Loans	879,445	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The Federal Reserve Bank of Dallas rated Central’s CRA performance as Satisfactory at the performance evaluation dated November 9, 2020. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs of the communities it serves.

DESCRIPTION OF ASSESSMENT AREA

- The Houston Metropolitan AA consists of Harris, Montgomery, and Fort Bend counties, which are a portion of the Houston-The Woodlands-Sugarland, Texas Metropolitan Statistical Area (MSA). Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- According to the 2020 FFIEC Census Data, the AA is comprised of 1,381 census tracts: 209 low-income, 357 moderate-income, 346 middle-income, 426 upper-income, and 43 unknown-income census tracts.
- Central operates four branches within the AA, which is 100.0 percent of the bank’s total branches. The main office is in a middle-income census tract and the remaining three branches are in upper-income census tracts.
- In 2022, 900 institutions originated or purchased 156,023 HMDA-reportable loans in the Houston Metropolitan AA. Of those, the bank ranked 128th, originating 190 or 0.1 percent of loans.
- The Federal Deposit Insurance Corporation’s (FDIC’s) Market Share Report as of June 30, 2023, shows the bank had a 0.3 percent market share, ranking 25th out of 90 FDIC-insured depository institutions operating in the AA. JP Morgan Chase led the market with 50.3 percent of the market share. Other market share leaders include Wells Fargo, NA and Bank of America, with 8.9 percent and 8.3 percent, respectively.

- Community contacts noted that affordable housing, workforce development, long-term financial commitments, and accessible small business loans are needed to support AA.

Table 2

Population Change			
Assessment Area: Houston Metropolitan			
Area	2015 Population	2020 Population	Percentage Change
Houston Metropolitan AA	5,517,279	6,174,367	11.9
Fort Bend County, TX	658,331	822,779	25.0
Harris County, TX	4,356,362	4,731,145	8.6
Montgomery County, TX	502,586	620,443	23.5
Houston-The Woodlands-Sugar Land, TX MSA	6,346,653	7,122,240	12.2
Texas	26,538,614	29,145,505	9.8

*Source: 2011-2015 U.S. Census Bureau: Decennial Census
2020 U.S. Census Bureau: American Community Survey*

- As depicted in Table 2, the AA population experienced significant growth between 2015 and 2020. While comparable to the AA population growth, at 11.9 percent, is comparable to the Houston-The Woodlands-Sugar Land, Texas MSA, it exceeds the statewide growth of 9.8 percent.
- The counties of Fort Bend and Montgomery experienced the greatest population growth between 2015 and 2020, at 25.0 percent and 23.5 percent, respectively. A community contact attributed the significant population growth to Californians moving to the area due to the AA's housing affordability and employment opportunities in the oil and gas, healthcare, and finance industries.

Table 3

Median Family Income Change			
Assessment Area: Houston Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percentage Change
Houston Metropolitan AA	74,243	79,873	7.6
Fort Bend County, TX	108,399	109,870	1.4
Harris County, TX	67,969	73,274	7.8
Montgomery County, TX	88,680	99,511	12.2
Houston-The Woodlands-Sugar Land, TX MSA	75,795	81,859	8.0
Texas	68,523	76,073	11.0

*Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- According to 2020 American Community Survey (ACS) data, approximately 1,472,907 families reside in the AA, of which 41.0 percent are classified as LMI.
- While the AA median family income grew at a slower rate than the statewide, it remained higher.

- According to the FFIEC Census Data, 11.1 percent of the AA families live below the poverty level, which is comparable to the statewide figure, at 10.9 percent. It is noteworthy that the percentage of families living below the poverty level in the counties of Fort Bend and Montgomery is 5.8 percent and 6.5 percent, respectively, which indicates families residing in these counties are generally more affluent.
- Harris County houses the greatest amount of opportunity zones in the state of Texas. Opportunity zones are census tracts comprised of economically distressed communities. Therefore, the AA is comprised of many economically distressed communities.

Table 4

Housing Cost Burden Rates						
Assessment Area: Houston Metropolitan						
Area	Cost Burden - Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Houston Metropolitan AA	81.6	47.1	44.9	61.1	37.3	19.9
Fort Bend County, TX	76.6	65.7	41.8	70.8	48.2	19.8
Harris County, TX	82.0	45.4	45.7	60.7	35.9	20.3
Montgomery County, TX	80.2	52.3	38.4	54.8	35.5	17.4
Houston-The Woodlands-Sugar Land, TX MSA	81.2	46.2	44.6	59.8	35.9	19.5
Texas	78.3	44.6	42.7	57.3	31.0	19.0

Cost burden is housing cost that equals 30 percent or more of household income.
 Source: 2016-2020 Comprehensive Housing Affordability Strategy
 U.S. Department of Housing and Urban Development (HUD)

- The AA housing cost burden for LMI individuals is higher than the statewide average for both renters and homeowners, as demonstrated in the Table 4.
- The AA housing cost burden for low-income renters is substantially higher than the housing cost burden of any other renter.
- The AA housing affordability ratio¹, at 32.6 percent, is below the statewide ratio of 34.1 percent; therefore, AA housing is less affordable than statewide housing.
- Of the housing units in the AA, 54.3 percent are owner-occupied, 37.4 percent are rental, and 8.3 percent are vacant.
- A community contact noted housing is generally more affordable in other regions of the nation. Many investors have exacerbated gentrification in the AA by purchasing rental properties and driving up the cost of rent. Thus, housing is less affordable for long-term residents.

¹ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less housing affordability.

Table 5

Unemployment Rates					
Assessment Area: Houston Metropolitan					
Area	2018	2019	2020	2021	2022
Houston Metropolitan AA	4.3	3.8	8.7	6.2	4.2
Fort Bend County, TX	4.0	3.5	7.6	5.9	3.9
Harris County, TX	4.4	3.9	9.0	6.4	4.2
Montgomery County, TX	3.8	3.4	7.5	5.8	3.9
Houston-The Woodlands-Sugar Land, TX MSA	4.4	3.8	8.7	6.3	4.2
Texas	3.9	3.5	7.7	5.6	3.9

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA unemployment rates have been consistently above the statewide rates for the past five years.
- The sharp increase in unemployment during 2020, as reflected in Table 5, is primarily attributed to the COVID-19 pandemic, which caused many businesses to downsize or closed their operations. In 2022, the AA unemployment rate stabilized and returned to pre-pandemic levels.
- Major industries that provide employment opportunities in the AA include healthcare and social services, retail trade, and professional and technical services.

Table 6 details selected characteristics of the AA.

Table 6

2023 Houston Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	209	15.1	164,320	11.2	53,365	32.5	356,915	24.2
Moderate	357	25.9	351,177	23.8	56,365	16.1	248,019	16.8
Middle	346	25.1	408,271	27.7	30,987	7.6	261,507	17.8
Upper	426	30.8	531,661	36.1	18,068	3.4	606,466	41.2
Unknown	43	3.1	17,478	1.2	4,184	23.9	0	0.0
Total AA	1,381	100.0	1,472,907	100.0	162,969	11.1	1,472,907	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	290,396	69,750	5.6	24.0	184,076	63.4	36,570	12.6
Moderate	557,342	253,278	20.5	45.4	253,935	45.6	50,129	9.0
Middle	606,137	363,566	29.4	60.0	198,990	32.8	43,581	7.2
Upper	781,928	539,702	43.6	69.0	188,657	24.1	53,569	6.9
Unknown	43,951	11,199	0.9	25.5	26,614	60.6	6,138	14.0
Total AA	2,279,754	1,237,495	100.0	54.3	852,272	37.4	189,987	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	29,525	9.4	26,686	9.2	2,659	12.2	180	5.1
Moderate	63,966	20.3	58,350	20.2	5,154	23.6	462	13.2
Middle	79,063	25.1	73,581	25.4	4,806	22.0	676	19.3
Upper	137,129	43.6	126,284	43.6	8,725	39.9	2,120	60.5
Unknown	5,151	1.6	4,573	1.6	509	2.3	69	2.0
Total AA	314,834	100.0	289,474	100.0	21,853	100.0	3,507	100.0
Percentage of Total Businesses:				91.9		6.9		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	68	3.5	65	3.4	3	7.7	0	0.0
Moderate	279	14.4	266	14.0	12	30.8	1	25.0
Middle	503	25.9	491	25.9	9	23.1	3	75.0
Upper	1,063	54.8	1,049	55.3	14	35.9	0	0.0
Unknown	27	1.4	26	1.4	1	2.6	0	0.0
Total AA	1,940	100.0	1,897	100.0	39	100.0	4	100.0
Percentage of Total Farms:				97.8		2.0		0.2
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The performance evaluation discusses the bank’s overall performance in the bank’s Houston Metropolitan AA. Central’s lending performance in the AA is Satisfactory. Central’s small business lending was assigned greater weight when assessing performance, as this product represents the greatest volume of lending and aligns with the bank’s strategic focus.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending considering performance context, such as the bank’s capacity to lend, the availability of lending opportunities, and the demographic and economic factors present in the AA. In addition, the bank’s NLTD is compared to similarly situated institutions insured by the FDIC, which are selected based on asset size, portfolio mix, and proximity.

The bank’s 13-quarter average NLTD of 83.6 percent is reasonable. Central’s average NLTD is comparable to those of similarly situated banks shown in Table 7, which range from 70.8 percent to 95.9 percent.

Table 7

Comparative Net Loan-to-Deposit Ratios October 1, 2020 - December 31, 2023			
Institution	Location	Asset Size \$(000)	13-Quarter Average NLTD Ratio (%)
Central Bank	Houston, Texas	1,109	83.6
Similar Situated Institutions			
Bank #1	Houston, Texas	1,768	95.9
Bank #2	Houston, Texas	1,109	94.5
Bank #3	Houston, Texas	685	70.8

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. As shown in Table 8, the bank originated a majority of loans, by number and dollar amount, inside the AA, demonstrating a commitment to meeting the credit needs of the AA in which it operates.

Table 8

Lending Inside and Outside of the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Total HMDA	182	60.9	49,760	66.5	117	39.1	25,012	33.5
Total Small Business	93	90.3	28,839	92.0	10	9.7	2,505	8.0
Total Loans	275	68.4	78,599	74.1	127	31.6	27,517	25.9

The remaining criteria only consider loans extended within the bank’s AA.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of HMDA and small business lending by income level of census tracts, considering the dispersion of loans throughout the AA. The bank's geographic distribution of loans reflects reasonable distribution among the different geographies and dispersion throughout the AA. No conspicuous gaps or anomalies were noted in the bank's lending pattern. Central's small business lending was assigned greater weight when assessing performance, as this product represents the greatest volume of lending and aligns with the bank's strategic focus. Given that the bank did not originate a sufficient volume of multifamily loans, this HMDA product was not evaluated.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA lending reflects reasonable penetration throughout the AA. The 2022 distribution of HMDA lending among low-income census tracts exceeded the aggregate data but fell below the percentage of AA owner-occupied units. Among moderate-income census tracts, the bank's performance was comparable to aggregate data but below the demographic figure. Notably, aggregate lenders also preformed below the demographic figure in moderate-income census tracts.

Home Purchase Lending

The geographic distribution of the bank's home purchase loans among LMI census tracts is excellent. The bank's distribution of home purchase loans among low-income census tracts almost doubled aggregate lending and was significantly above the demographic figure. In addition, Central's lending in moderate-income census tracts was above aggregate lenders and equivalent to the percentage of AA owner-occupied units.

Home Refinance Lending

The geographic distribution of the bank's home refinance loans among LMI census tracts is reasonable. The bank's 2022 home refinance lending performance among LMI geographies was comparable to aggregate lenders' performance and below the demographic figure.

Home Improvement Lending

The geographic distribution of the bank's home improvement loans among LMI census tracts is poor. In 2022, the bank did not originate any home improvement loans in low-income census tracts. Among moderate-income geographies, the bank's home improvement lending performance was below aggregate data and significantly below the demographic figure.

Table 9

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Houston Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	7	8.4	4.1	1,396	4.5	2.8	5.6
Moderate	17	20.5	16.2	4,037	12.9	11.5	20.5
Middle	16	19.3	30.6	4,178	13.4	25.9	29.4
Upper	43	51.8	48.1	21,612	69.2	58.9	43.6
Unknown	0	0.0	1.0	0	0.0	0.9	0.9
Total	83	100.0	100.0	31,223	100.0	100.0	100.0
Refinance Loans							
Low	1	4.0	3.4	430	4.4	2.2	5.6
Moderate	4	16.0	15.7	475	4.8	10.2	20.5
Middle	3	12.0	30.6	1,151	11.7	23.8	29.4
Upper	17	68.0	49.5	7,794	79.1	63.0	43.6
Unknown	0	0.0	0.9	0	0.0	0.7	0.9
Total	25	100.0	100.0	9,850	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.3	0	0.0	2.5	5.6
Moderate	3	4.3	11.6	210	3.3	8.1	20.5
Middle	12	17.4	22.6	997	15.6	17.7	29.4
Upper	54	78.3	61.9	5,166	81.1	71.0	43.6
Unknown	0	0.0	0.7	0	0.0	0.7	0.9
Total	69	100.0	100.0	6,373	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	21.2	0	0.0	13.0	
Moderate	2	66.7	27.4	510	26.6	20.2	26.6
Middle	0	0.0	19.2	0	0.0	27.4	20.4
Upper	1	33.3	28.4	1,404	73.4	33.9	24.6
Unknown	0	0.0	3.8	0	0.0	5.4	4.1
Total	3	100.0	100.0	1,914	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	8	4.4	3.9	1,826	3.7	4.2	
Moderate	26	14.3	16.0	5,232	10.5	12.5	20.5
Middle	31	17.0	30.3	6,326	12.7	25.6	29.4
Upper	117	64.3	48.7	36,376	73.1	56.2	43.6
Unknown	0	0.0	1.0	0	0.0	1.5	0.9
Total	182	100.0	100.0	49,760	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank’s 2023 lending to businesses located in low-income geographies in the AA, at 3.2 percent, is below the demographic figure of 9.4 percent. However, Central’s lending to businesses located in moderate-income geographies in the AA, at 19.4 percent, is comparable to the demographic figure of 20.3 percent.

The bank originated three small business loans in low-income geographies. The low level of lending is attributed to the significant level of competition for small business lending in the AA. Central ranked 25th among 90 FDIC-insured depository financial institutions operating in the AA. Moreover, the location of the bank’s branches in middle- and upper-income census tracts contributes to the difficulty to reach LMI geographies. Despite these challenges, the bank extended 18 loans to small businesses located in moderate-income geographies, which reflects favorably on its ability to meet the needs of small businesses.

Table 10

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Houston Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	3	3.2	2,180	7.6	9.4
Moderate	18	19.4	4,999	17.3	20.3
Middle	12	12.9	4,073	14.1	25.1
Upper	59	63.4	17,556	60.9	43.6
Unknown	1	1.1	30	0.1	1.6
Total	93	100.0	28,839	100.0	100.0
<i>Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>					

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s distribution of lending to borrowers reflects reasonable penetration among individuals of different income levels and businesses of different revenue sizes. Given Central’s focus on commercial lending, the bank’s small business lending performance carried greater weight than the HMDA lending.

Residential Real Estate (HMDA) Lending

The borrower distribution of HMDA lending is poor. As shown in Table 11, the dispersion of 2022 home mortgage lending to LMI borrowers is below the aggregate data and significantly below the demographic figure. The bank’s low level of HMDA lending to LMI borrowers is attributed to increasing interest rate environment and the difficulty in LMI families to qualify for mortgage loans. Additionally, the bank faces significant competition in the AA, as Central ranked 128th out of 990 HMDA reporters in the AA. The bank competes against large entities, such as Rocket Mortgage and United Shore Financial Service, ranked first and second, respectively, which can make it difficult for the bank to obtain mortgage applicants.

Table 11

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Houston Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	3	3.6	2.6	419	1.3	1.2	24.2
Moderate	6	7.2	14.3	1,578	5.1	9.4	16.8
Middle	20	24.1	20.3	4,889	15.7	16.9	17.8
Upper	38	45.8	40.4	16,366	52.4	52.5	41.2
Unknown	16	19.3	22.3	7,971	25.5	19.9	0.0
Total	83	100.0	100.0	31,223	100.0	100.0	100.0
Refinance Loans							
Low	1	4.0	7.2	67	0.7	3.6	24.2
Moderate	2	8.0	17.1	315	3.2	10.9	16.8
Middle	2	8.0	21.0	643	6.5	16.3	17.8
Upper	13	52.0	41.1	5,555	56.4	54.5	41.2
Unknown	7	28.0	13.6	3,270	33.2	14.7	0.0
Total	25	100.0	100.0	9,850	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.3	0	0.0	3.0	24.2
Moderate	0	0.0	11.4	0	0.0	7.5	16.8
Middle	0	0.0	16.8	0	0.0	12.1	17.8
Upper	69	100.0	64.3	6,373	100.0	74.7	41.2
Unknown	0	0.0	2.1	0	0.0	2.6	0.0
Total	69	100.0	100.0	6,373	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	2.2	3.8	486	1.0	1.7	24.2
Moderate	8	4.5	14.7	1,893	4.0	9.6	16.8
Middle	22	12.3	20.1	5,532	11.6	16.6	17.8
Upper	122	68.2	41.1	28,694	60.0	53.2	41.2
Unknown	23	12.8	20.3	11,241	23.5	19.0	0.0
Total	179	100.0	100.0	47,846	100.0	100.0	100.0
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Small Business Lending

The borrower distribution of small business lending is reasonable. As shown in Table 12, the bank originated 32.3 percent by number of loans and 31.3 percent by dollar amount to businesses with reported gross annual revenues of \$1 million or less. The bank's performance fell substantially below the demographic figure of 91.9 percent. Given the bank is not a CRA reporter, aggregate data is not used to assess its performance. However, aggregate data provides relevant regarding small business loan demand. In 2023, aggregate lenders reported that 33.0 percent of small business loans were originated to businesses with annual revenues of \$1 million or less. This number is comparable to the bank's performance. Additionally, 54.8 percent of Central's small business lending was extended in amounts of \$250,000 or less, which points to the bank's

willingness to extend credit to small businesses, as they usually require smaller dollar loan amounts. It is noteworthy that 15.1 percent of the bank’s small business loans did not consider the gross annual revenue. Lastly, a community contact noted that startups and very small businesses within in the AA often do not meet underwriting eligibility standards of traditional financial institutions.

Table 12

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Houston Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	30	32.3	9,025	31.3	91.9
Over \$1 Million	49	52.7	15,979	55.4	6.9
Revenue Unknown	14	15.1	3,834	13.3	1.1
Total	93	100.0	28,839	100.0	100.0
By Loan Size					
\$100,000 or Less	24	25.8	1,494	5.2	
\$100,001 - \$250,000	27	29.0	5,269	18.3	
\$250,001 - \$1 Million	42	45.2	22,076	76.5	
Total	93	100.0	28,839	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	11	36.7	650	7.2	
\$100,001 - \$250,000	6	20.0	1,260	14.0	
\$250,001 - \$1 Million	13	43.3	7,115	78.8	
Total	30	100.0	9,025	100.0	
<i>Source: 2023 FFIEC Census Data</i>					
<i>2023 Dun & Bradstreet Data</i>					
<i>2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The CD Test evaluates the responsiveness to the needs of its AA through qualified CD loans, investments, and services, considering the bank’s capacity and the need and availability of such opportunities in the AA.

The bank’s CD performance demonstrates adequate responsiveness to the needs of the AA, as a substantial portion of the bank’s CD activity relate to qualified loans and investments with affordable housing as the primary purpose. Central’s CD activity performance is reasonable despite the 27 percent and 30 percent decrease in qualified investments and services, respectively, since the previous examination. The notable decrease in qualified investments and services is somewhat outweighed by the 21 percent increase in CD loans. Community contacts identified ample opportunities for the bank to increase its CD activity within the AA.

Table 13 outlines the bank’s total qualified CD activity within the AA.

Table 13

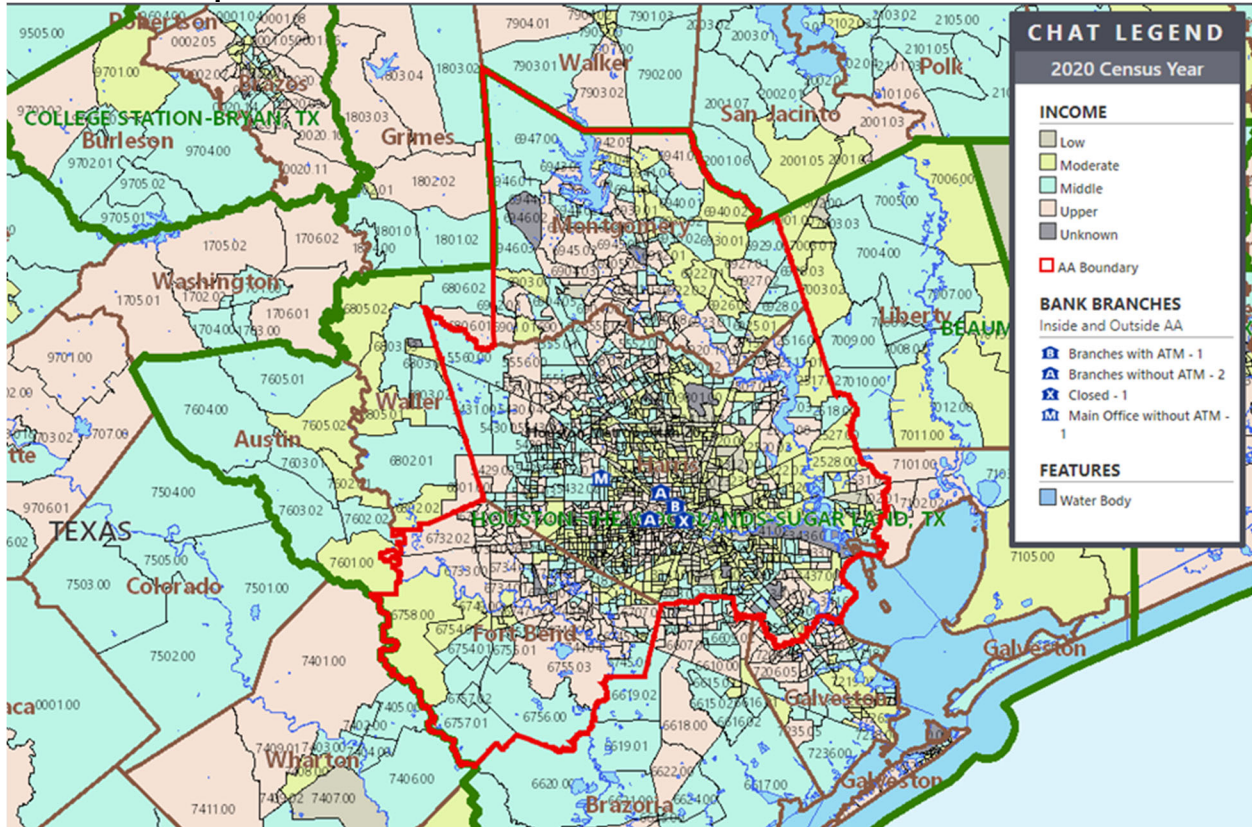
Community Development Activity Assessment Area: Houston Metropolitan									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	5	10,603	12	4,800	0	0	12	4,800	1
Community Services	0	0	0	0	9	89	9	89	8
Economic Development	0	0	0	0	0	0	0	0	0
Revitalization and Stabilization	3	11,385	0	0	0	0	0	0	1
Totals	8	21,988	12	4,800	9	89	21	4,889	10

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Houston Metropolitan AA



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2022 Houston Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	209	15.1	164,320	11.2	53,365	32.5	356,915	24.2
Moderate	357	25.9	351,177	23.8	56,365	16.1	248,019	16.8
Middle	346	25.1	408,271	27.7	30,987	7.6	261,507	17.8
Upper	426	30.8	531,661	36.1	18,068	3.4	606,466	41.2
Unknown	43	3.1	17,478	1.2	4,184	23.9	0	0.0
Total AA	1,381	100.0	1,472,907	100.0	162,969	11.1	1,472,907	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	290,396	69,750	5.6	24.0	184,076	63.4	36,570	12.6
Moderate	557,342	253,278	20.5	45.4	253,935	45.6	50,129	9.0
Middle	606,137	363,566	29.4	60.0	198,990	32.8	43,581	7.2
Upper	781,928	539,702	43.6	69.0	188,657	24.1	53,569	6.9
Unknown	43,951	11,199	0.9	25.5	26,614	60.6	6,138	14.0
Total AA	2,279,754	1,237,495	100.0	54.3	852,272	37.4	189,987	8.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	31,925	9.5	28,894	9.3	2,799	12.2	232	5.7
Moderate	68,312	20.3	62,335	20.1	5,445	23.7	532	13.1
Middle	83,182	24.7	77,437	25.0	4,987	21.8	758	18.7
Upper	147,467	43.8	135,848	43.9	9,165	40.0	2,454	60.5
Unknown	5,856	1.7	5,247	1.7	531	2.3	78	1.9
Total AA	336,742	100.0	309,761	100.0	22,927	100.0	4,054	100.0
Percentage of Total Businesses:				92.0		6.8		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	82	4.0	79	3.9	3	7.7	0	0.0
Moderate	289	14.0	276	13.6	12	30.8	1	20.0
Middle	522	25.3	510	25.2	9	23.1	3	60.0
Upper	1,143	55.3	1,128	55.8	14	35.9	1	20.0
Unknown	30	1.5	29	1.4	1	2.6	0	0.0
Total AA	2,066	100.0	2,022	100.0	39	100.0	5	100.0
Percentage of Total Farms:				97.9		1.9		0.2
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans,

loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.