PUBLIC DISCLOSURE

January 22, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Central Bank
RSSD# 546544

600 Lake Avenue
Storm Lake, Iowa 50588

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S CRA RATING

Central Bank Overall CRA Rating: Satisfactory

Performance Test Rating Table

The following table indicates the performance level of Central Bank with respect to the lending, investment, and service test.

Central Bank			
Performance Levels	**Performance Tests**		
	Lending Test	**Investment Test**	**Service Test**
Outstanding			✓
High Satisfactory	✓		
Low Satisfactory		✓	
Needs to Improve			
Substantial Noncompliance			

 * *Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating*

Summary of Major Factors that Support the Rating

Lending Test:
- Lending levels reflect good responsiveness to assessment area credit needs;
- A substantial majority of loans were made in the bank's assessment areas;
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and business and farms of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms;
- The bank made a relatively high level of community development loans; and

- Limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:
- The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position;
- The bank made rare use of innovative and/or complex investments to support community development initiatives; and
- The bank exhibits adequate responsiveness to credit and community development needs.

Service Test:
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area;
- The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals;
- Services do not vary in a way that inconveniences the needs of its assessment area. Particularly to low- and moderate-income geographies and/or low- and moderate-income individuals; and
- The bank is a leader in providing community development services.

CENTRAL BANK

DESCRIPTION OF INSTITUTION

Central Bank, headquartered in Storm Lake, Iowa, is a wholly owned subsidiary of Commercial Financial Corporation, a privately owned financial holding company also headquartered in Storm Lake, Iowa. According to the Uniform Bank Performance Report, the bank reported total assets of $2.1 billion as of December 31, 2023. This represents an increase in asset size of approximately 50.0 percent since the previous evaluation when the bank reported $1.4 billion in assets (as of June 30, 2020).

Including the main office in Storm Lake, the bank delivers its products and services through a network of 20 branches, 23 cash-only automated teller machines (ATMs), and four loan production offices (LPOs). Since the previous evaluation, two loan production offices were opened while two full-service branches and one limited-service branch were closed. None of the closed branches were located in low- or moderate-income tracts, limiting any adverse effects on the accessibility of the bank's delivery systems.

As shown in the table below, as of December 31, 2023, commercial loans comprise the largest percentage of the loan portfolio at 66.4 percent, followed by residential real estate at 19.3 percent,

and agricultural loans at 9.8 percent. In addition to its lending activities, deposit products include demand deposits, savings accounts, certificates of deposit, money market accounts, individual retirement accounts (IRAs), and negotiable orders of withdrawal. The bank also offers eBanking via its website, www.centralbankonline.com. This mix of lending and deposit products provides the bank with opportunities to help meet the credit needs of its communities.

Composition of Loan Portfolio as of **December 31, 2023** (000's)		
Loan Type	$	%
Commercial	1,256,032	66.4
Residential Real Estate	365,235	19.3
Agriculture	185,986	9.8
Consumer	67,700	3.6
Other	15,864	0.8
Total	1,890,817	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

Central Bank is an interstate bank that currently operates in six assessment areas throughout Iowa, Nebraska, and South Dakota. The bank's assessment area has not expanded since the previous evaluation on November 16, 2020; however, the assessment areas of Sioux Falls, SD Metropolitan Statistical Area (MSA) #43620 and Brookings County SD Non-MSA were not reviewed at the previous evaluation as they had been recently added due to branch acquisitions. The bank's CRA assessment areas include the following: the Des Moines-West Des Moines, IA MSA #19780 (all of Polk and Dallas Counties), Sioux City, IA-NE-SD MSA #43580 (Woodbury County, IA, in its entirety, Dakota County, SD, in part, and Union County, SD in its entirety), Buena Vista/Cherokee County Non-MSA IA (both counties in their entireties), Sioux Falls, SD MSA #43620 (all of Lincoln and Minnehaha Counties), Brookings County Non-MSA SD (entire county) and Dickinson County Non-MSA IA (entire county).

The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending and community development activity that took place in calendar years up to and including 2021 are evaluated based on American Community Survey (ACS) income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

The combined assessment area includes 12 low-, 56 moderate-, 119 middle-, 61 upper-, and four unknown-income census tracts. There are no distressed or underserved census tracts within the combined assessment area. Census tract designation details relative to the bank's branch operations are outlined in the following table. The bank operates six branches, or 30.0 percent of total branches, in low- and moderate-income census tracts.

Central Bank Branch Locations							
Assessment Area	**Low-Income**	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**	**Total**	
	#	#	#	#	#	#	%
Des Moines-West Des Moines, IA MSA #19780	0	2	5	1	0	8	40.0
Sioux City, IA-NE-SD MSA #43580	0	1	2	1	0	4	20.0
Sioux Falls, SD MSA #43620	1	1	0	1	0	3	15.0
Buena Vista and Cherokee Counties, IA Non-MSA	0	0	2	1	0	3	15.0
Dickinson County, IA Non-MSA	0	1	0	0	0	1	5.0
Brookings County, SD Non-MSA	0	0	1	0	0	1	5.0
Total	1	5	10	4	0	20	100.0
Note: Percentages may not total to 100.0 percent due to rounding.							

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

At its previous evaluation conducted on November 16, 2020, the bank was rated Satisfactory under the CRA.

SCOPE OF THE EXAMINATION

Central Bank's CRA performance was evaluated using the Federal Financial Institutions Examination Council's Large Institution CRA Examination Procedures. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs in its assessment area. The evaluation was performed in the context of information about the institution, such as asset size, financial condition, market presence of other financial institutions, as well as local economic and demographic characteristics.

Products reviewed include Home Mortgage Disclosure Act (HMDA)- reportable loans originated from January 1, 2021, through December 31, 2022, and Community Reinvestment Act (CRA)-reportable small business and small farm loans originated from January 1, 2022, through December 31, 2022. HMDA-reportable loans were used to analyze home mortgage lending activity, and CRA-reportable loans were used to analyze small business and small farm lending activity. CRA-reportable small farm lending was only considered for the Buena Vista and Cherokee County IA Non-MSA assessment area as there was significant volume for analysis within this assessment area; the remaining assessment areas did not have sufficient small farm data to produce a meaningful analysis. The evaluation places more emphasis on HMDA-reportable loans than CRA-reportable loans given the disparity in volume between the two product lines. Further, the bank's

overall CRA rating was heavily weighted based on performance in the State of Iowa given the relatively high loan volume and community development activity in that state.

- *Level of Lending Activity:* The bank's HMDA-reportable loans, originated from January 1, 2021, through December 31, 2022, and CRA-reportable loans originated from January 1, 2022, through December 31, 2022, were reviewed to determine the responsiveness to credit needs in the assessment areas.

- *Lending in the Assessment Area:* The bank's HMDA-reportable loans, originated from January 1, 2021, through December 31, 2022, and CRA-reportable loans originated from January 1, 2022, through December 31, 2022, were analyzed to determine the percentage of loans originated in the bank's combined assessment area.

- *Geographic Distribution of Lending in the Assessment Area:* HMDA-reportable loans, originated from January 1, 2021, through December 31, 2022, and CRA-reportable loans originated from January 1, 2022, through December 31, 2022, were analyzed to determine the extent to which the bank is lending in census tracts of different income levels, particularly those designated as low- or moderate-income.

- *Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes:* HMDA-reportable loans, originated from January 1, 2021, through December 31, 2022, and CRA-reportable loans originated from January 1, 2022, through December 31, 2022, were analyzed to determine the distribution among borrowers of different income levels, particularly low- or moderate-income borrowers, and to businesses and farms of different revenue sizes.

- *Community Development Lending:* The number, dollar volume, innovativeness and complexity of community development loans originated from November 17, 2020, through January 22, 2024, were reviewed.

- *Innovative or Flexible Lending Practices:* The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals or geographies and small businesses was assessed.

- *Investments:* Qualified investments, grants, and donations made from November 17, 2020, through January 22, 2024, were reviewed to determine the bank's responsiveness to community development needs. In addition, outstanding qualified investments made prior to November 17, 2020, were also considered. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments.

- *Services:* The distribution of the bank's branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services undertaken from November 17, 2020, through January 22, 2024, were reviewed.

Full-scope examination procedures were conducted for four designated assessment areas, which were selected based on several factors including deposit market share, office and ATM concentration, volume of HMDA- and CRA reportable lending, economic and demographic characteristics, and community development needs. The following assessment areas received full reviews:

<u>Full Review Assessment Areas:</u>

State of Iowa
- Des Moines-West Des Moines, IA MSA #19780
- Buena Vista and Cherokee Counties, IA Non-MSA

State of South Dakota
- Sioux Falls, SD MSA #43620

Multistate MSA
- Sioux City, IA-NE-SD MSA #43580

Assessment areas under limited review were evaluated for consistency with the bank's overall performance. Performance in assessment areas under limited review does not affect the overall rating. The following assessment areas received limited reviews:

<u>Limited Review Assessment Areas:</u>

State of Iowa
- Dickinson County, IA Non-MSA

State of South Dakota
- Brookings County, SD Non-MSA

In addition, seven community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the full-scope assessment areas. Organizations focusing on economic development, affordable housing, and small business needs were contacted. Refer to individual assessment area summaries for community representative information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Central Bank's performance relative to the lending test is rated high satisfactory based on performance across the combined assessment areas. Factors contributing to the rating include: lending activity reflects good responsiveness to credit needs in its assessment areas; a substantial majority of loans were made in the bank's assessment areas; geographic distribution of loans reflects adequate penetration throughout the assessment areas; distribution of borrowers reflects good penetration among individuals of different income levels and businesses and farms of different sizes; a good record of serving the credit needs of low-income individuals and areas, and very small businesses and farms; the bank made a relatively high level of community development loans; and made limited use of innovative or flexible lending practices in serving assessment area credit needs.

Level of Lending Activity

Central Bank's lending levels reflect good responsiveness to credit needs in its assessment area, considering the number and amount of home mortgage, small business, and small farm loans extended in its assessment area.

During the review period, the bank's HMDA-reportable and CRA-reportable small business and farm lending activity comprised 3,421 loans for a total of $895.9 million. The bank's level of lending activity was not evaluated at the previous exam as the bank was considered an Intermediate-Small Bank due to its asset size, and hence was not a CRA-Reporter for small business and farm loans. However, the bank's HMDA volume for this two-year review period is nearly double the amount of HMDA loans originated in the previous evaluations two-year period (2018 and 2019).

The following table summarizes the bank's lending activity for the review period.

Summary of Lending Activity January 1, 2021 – December 31, 2022 (HMDA) January 1, 2022 – December 31, 2022 (CRA)				
Loan Type	#	%	$(000s)	%
Home Improvement	77	2.3	4,391	0.5
Home Purchase	1,536	44.9	398,189	44.4
Multi-Family Housing	48	1.4	120,406	13.4
Refinancing	848	24.8	188,345	21.0
Total HMDA-Reportable	**2,509**	73.3	**711,331**	79.4
Total Small Business CRA-Reportable	**638**	18.6	**144,472**	16.1
Total Small Farm CRA-Reportable	274	8.0	40,077	4.5
Total Loans	**3,421**	**100.0**	**895,880**	**100.0**
Note: Percentages may not total to 100.0 percent due to rounding.				

Assessment Area Concentration

Central Bank made a substantial majority of loans in its assessment area. The bank originated 82.0 percent of its loans by number and 81.9 percent by dollar volume within the bank's combined assessment area. During the review period, 81.9 percent by number and 80.8 percent by dollar volume of the bank's HMDA-reportable loans were originated within the combined assessment area. Further, 90.9 percent by number and 91.7 percent by dollar volume of the bank's small business loans were originated within the combined assessment area during the same period. Small farms loans had the lowest concentration of products reviewed with 61.7 percent by number and 65.4 percent by dollar volume within the assessment area. The performance during this review period represents a slight decline when compared to the previous evaluation in which the bank originated 86.5 percent by number and 84.5 percent by dollar volume of total loans within the assessment area. However, it should be noted that the prior evaluation did not include CRA-reportable loans.

The following table summarizes the bank's lending inside and outside its combined assessment area for HMDA-reportable and CRA-reportable loans during the review period.

Lending Inside and Outside the Assessment Area								
Loan Type	**Inside**				**Outside**			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	71	92.2	4,051	92.3	6	7.8	340	7.7
Home Purchase – Conventional	1,153	80.0	295,237	76.4	289	20.0	91,228	23.6
Home Purchase – FHA	66	70.2	7,883	67.2	28	29.8	3,841	32.8
Multi-Family Housing	40	83.3	108,682	90.3	8	16.7	11,724	9.7
Refinancing	726	85.6	159,044	84.4	122	14.4	29,301	15.6
Total HMDA Reportable	**2,056**	**81.9**	**574,897**	**80.8**	**453**	**18.1**	**136,434**	**19.2**
Total Small Business Reportable	**580**	**90.9**	**132,505**	**91.7**	**58**	**9.1**	**11,967**	**8.3**
Total Small Farm related	**169**	**61.7**	**26,196**	**65.4**	**105**	**38.3**	**13,881**	**34.6**
Total Loans	**2,805**	**82.0**	**733,598**	**81.9**	**616**	**18.0**	**162,282**	**18.1**
Note: Percentages may not total to 100.0 percent due to rounding.								

Geographic and Borrower Distribution

Central Bank's geographic distribution of loans reflects adequate penetration throughout the assessment areas. The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and businesses and farms of different sizes. The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms. Additionally, the bank made limited use of innovative or flexible lending practices in serving assessment area credit needs. The conclusions are based upon the bank's record of lending in the four full-scoped review assessment areas, with the

volume of lending in each of those assessments areas being considered in the assignment of the institutions overall performance conclusions.

Details of the innovative or flexible lending products loan types are highlighted below:

- Farm Service Guaranteed Farm Loans – Central Bank participates in the FSA Guaranteed Farm Loans.
- Small Business Administration Program – This facilitates small business loans in the community utilizing SBA 504 Programs.
- USDA Rural Housing Loans – Loans are available for first-time homeowners with little or no down payment. Loans may exceed home value and include 100.0 percent of purchase as well as closing costs. Loans have a 30-year fixed rate with a USDA guaranty.
- Additionally, Central Bank was active in providing loans to small businesses during the COVID-19 pandemic under the PPP.

Community Development Lending

Central Bank made a relatively high level of community development loans. The bank originated 23 community development loans, totaling $51.9 million during this evaluation period. The bank also made 175 Paycheck Protection Program (PPP) loans that qualified as community development totaling $16.8 million during the review period. Central Bank was allowed to submit 2021 PPP loans in amounts of less than $1 million as it was not a CRA-Reporter until January 1, 2022, when it had crossed asset threshold to become a large bank. Additional details of the bank's community development lending can be found within the individual assessment area analyses.

The following table provides a summary of the bank's community development lending during the review period.

Community Development Loans (Dollars in 000s) November 17, 2020, through January 22, 2024											
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Full-Scope Assessment Areas										
Des Moines-West Des Moines, IA MSA	4	6,620	3	5,712	3	3,661	2	8,000	12	23,993
Buena Vista and Cherokee Counties, IA Non-MSA	3	17,954	0	0	0	0	0	0	3	17,954
Sioux City, IA-NE-SD MSA	0	0	0	0	3	3,646	0	0	3	3,646
Sioux Falls, SD MSA	1	665	0	0	4	5,645	0	0	5	6,310
Limited-Scope Areas										
Dickinson County, IA Non-MSA	0	0	0	0	0	0	0	0	0	0
Brookings County, SD Non-MSA	0	0	0	0	0	0	0	0	0	0
Other										
PPP	0	0	0	0	4	6,637	171	10,144	175	16,781
Total	8	25,239	3	5,712	14	19,591	173	18,144	198	68,687

INVESTMENT TEST

Central Bank's performance relative to the investment test is low satisfactory. The bank made an adequate level of qualified investments, particularly those not routinely provided by private investors, and rarely in leadership positions. While the bank made rare use of innovative or complex qualified investments to support community development initiatives, it demonstrates adequate responsiveness to the credit and community development needs of its assessment areas based on the breadth of community organizations, to which it has made grants and donations, including those involved in affordable housing, community services, and revitalization/stabilization.

During the evaluation period, the bank originated $15.7 million in current period investments, an increase from the previous evaluation's $2.6 million. There was also an additional $2.1 million dollars in prior period investments with current outstanding balances. The investment dollars were heavily concentrated in the Sioux City, MSA assessment area with the rest of the balance being in the assessment areas within the state of Iowa . The bank's investments were primarily in affordable housing and community services.

The following table provides a summary of the bank's community development investments during the review period.

Qualified Investments (Dollars in 000s)							
Assessment Area	**Current Period**				**Current Period Total**	**Prior Period Outstanding Balances**	**Total**
	Affordable Housing	**Community Service**	**Economic Development**	**Revitalization and Stabilization**			
Full-Scope Areas							
Des Moines-West Des Moines, IA MSA	0	0	1,000	75	1,075	0	1,075
Buena Vista and Cherokee Counties, IA Non-MSA	0	0	0	0	0	2,062	2,062
Sioux City, IA-NE-SD MSA	0	3,900	10,430	0	14,330	0	14,330
Sioux Falls, SD MSA	0	0	0	0	0	0	0
Limited-Scope Areas							
Dickinson County, IA Non-MSA	0	0	295	0	295	0	295
Brookings County, SD Non-MSA	0	0	0	0	0	0	0
Total	0	3,900	11,725	75	15,700	2,062	17,762

In addition, the bank made a total of $499,136 in community development grants and donations in the 39-month evaluation period, which is a 26.6 percent decrease from the $679,828 in donations from the previous evaluation, which was over a 50-month review period. Once the difference in review periods are taken into account, the decrease would be 5.8 percent on a per month basis. Of the total donations qualified, 61.4 percent were disbursed by the foundation and 38.6 percent were disbursed by the bank. A large percentage, 70.6 percent, of the donations were directed towards two (Des Moines IA MSA and Sioux City IA-NE-SD MSA) of the six assessment areas. Further

analysis indicates that $390,336 in donations, or 78.2 percent, went towards organizations with a community service focus, followed by $57,800, or 11.6 percent, in donations going towards affordable housing initiatives. Overall, the bank made 245 donations to organizations across the six assessment areas.

The following table provides a summary of the bank's community development grants and donations during the review period.

Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Community Development Donations **November 17, 2020, through January 22, 2024**										
Full-Scope Areas										
Des Moines-West Des Moines, IA MSA	8	55,500	48	129,690	0	0	0	0	56	185,190
Buena Vista and Cherokee Counties, IA Non-MSA	0	0	50	55,013	0	0	0	0	50	55,013
Sioux City, IA-NE-SD MSA	0	0	84	127,392	1	40,000	0	0	85	167,392
Sioux Falls, SD MSA	1	800	30	61,966	1	10,000	1	1,000	33	73,766
Limited-Scope Areas										
Dickinson County, IA Non-MSA	0	0	4	2,333	0	0	0	0	4	2,333
Brookings County, SD Non-MSA	3	1,500	14	13,940	0	0	0	0	17	15,440
Total	12	57,800	230	390,336	2	50,000	1	1,000	245	499,136

SERVICE TEST

Central Bank's performance with respect to the service test is outstanding. The bank's retail delivery systems are accessible to geographies and individuals of different income levels in its assessment areas. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Services and business hours do not vary in a way that inconveniences the needs of its assessment areas, particularly moderate-income geographies and low- and moderate-income individuals. The bank is a leader in providing community

development services which was given significant weight for the service test rating.

Retail Services

The bank maintains a branch presence in both Iowa and South Dakota. The majority (15) of the bank's 20 branches are in the state of Iowa, including its main office in Storm Lake, Iowa. The bank has one branch in a low-income census tract and five branches in moderate-income census tracts. The branch distribution throughout the combined assessment area largely matches the census tract distribution by income level as 4.8 percent of tracts are low-income, and 22.2 percent of tracts are moderate-income. Most branches have cash-only ATMs nearby as the bank no longer offers full-service ATMs that accept deposits. During the evaluation period the bank closed two branches located in Storm Lake, Iowa (Buena Vista and Cherokee Counties IA, Non-MSA assessment area) while opening two loan production officers (LPOs), one in the Sioux City, IA-NE-SD MSA and the other in the Sioux Falls, SD MSA.

Bank locations are open Monday through Friday with standard hours between 8:00-8:30 a.m. to 4:00-5:00 p.m., along with drive-up services Monday through Saturday. The bank offers services through its website and mobile/internet banking. Additionally, the bank has various social media accounts where it communicates general information about the bank, information sharing with its customer base, and to spotlight community events.

Community Development Services

Bank personnel provided 6,472 community development service hours to organizations during the evaluation period of 39 months. This is an increase since the previous evaluation of 5.9 percent, which had 6,110 community development service hours over a 50-month period. However, the previous evaluation's review did not include the two assessment areas located in the state of South Dakota. Services were mostly devoted to community services, which provided services to low- or moderate-income individuals or families, representing 91.5 percent of the total service hours. Further, many service hours took the form of leadership roles on boards and committees, as well as for financial literacy purposes. Of note, service hours were evenly dispersed throughout the assessment areas when factoring in the number of branches and employees in each respective assessment area.

The following table provides a summary of the bank's qualified community development services during the review period.

Community Development Services November 17, 2020, through January 22, 2024					
Assessment Area	**Affordable Housing (Hours)**	**Community Service (Hours)**	**Economic Development (Hours)**	**Revitalization and Stabilization (Hours)**	**Total Hours**
Full-scope areas					
Des Moines-West Des Moines, IA MSA	327	1,668	0	0	1,995
Buena Vista and Cherokee Counties, IA Non-MSA	0	1,220	0	0	1,220
Sioux City, IA-NE-SD MSA	82	2,026	88	0	2,196
Sioux Falls, SD MSA	38	653	0	0	691
Limited-scope areas					
Dickinson County, IA Non-MSA	0	202	0	0	202
Brookings County, SD Non-MSA	18	151	0	0	169
Total	464	5,920	88	0	6,472
Note: Hours were rounded to the nearest decimal point and may not add to the totals, which were also rounded to the nearest decimal point.					

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

Central Bank	**CRA Performance Evaluation**
Storm Lake, Iowa	**January 22, 2024**

SIOUX CITY, IA-NE-SD MSA #43580 – Full Review

CRA RATING FOR SIOUX CITY, IA-NE-SD MSA[1]: SATISFACTORY
The Lending Test is rated: Low Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Outstanding

Lending Test:
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and business of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- The bank made an adequate level of community development loans; and
- Limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:
- A significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position;
- The bank made rare use of innovative and/or complex investments to support community development initiatives; and
- The bank exhibits good responsiveness to credit and community development needs.

Service Test:
- The bank service delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas;
- To the extent changes have been made, its record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals;
- The bank's services and business hours do not vary in a way that inconveniences the needs of its assessment area. Particularly to low- and moderate-income geographies and/or low- and moderate-income individuals; and
- The bank is a leader in providing community development services.

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[1]*This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.*

SCOPE OF EXAMINATION

Full scope review examination procedures were used to evaluate the bank's performance in the Sioux City MSA multi-state assessment area. The scope of this section is consistent with that which was defined for the whole review. For further information, refer to the "Scope of Examination" contained in the introduction of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SIOUX CITY, IA-NE-SD MSA[2]

The assessment area contains four branches, each with cash-only ATMs, and two loan production offices (LPOs). One LPO has been opened since the previous evaluation. Both LPOs are in moderate-income census tracts, along with one branch and cash-only ATM. In addition, two branches with ATMs are in middle-income tracts, and the remaining branch with ATM is in an upper-income tract. All branches and LPOs within the assessment area are in Sioux City, Iowa, except for the Dakota Dunes office, which is in North Sioux City, South Dakota. The offices and ATMs in the assessment area represent 20.0 percent and 17.4 percent of the institution's total offices and ATMs, respectively, based upon the combined assessment area.

The bank maintains a partial Sioux City MSA assessment area that consists of Woodbury and Union Counties, Iowa, in their entireties and three of Dakota County's four census tracts. There are 37 total census tracts in this assessment area. In 2022, the assessment area was comprised of two low-, eight moderate-, 17 middle-, nine upper-, and one unknown-income census tract. The unknown-income census tract is comprised of the WinnaVegas Casino Resort and undeveloped land east of the Missouri River in the state of Iowa. The actual geographic configuration of the assessment area has not changed since the previous evaluation; however, five middle income tracts were added from 2021 to 2022 due to Decennial Census tract changes. The table below shows the changes of designation of census tracts by income since the previous evaluation.

Tract Designation Change Data

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

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[2] *Census tract designations are based on American Community Survey income data. For years 2022 and after, the designations are based on 2016-2020 ACS data. For years 2021 and before, the designations are based on 2011-2015 ACS data. For examinations that include performance before and after 2022, both sets of data have been used to perform the analysis of bank activity in the respective timeframes.*

The following shows the changes of designation of census tracts by income since the previous evaluation.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	2	2	0
Moderate	8	8	0
Middle	12	17	+5
Upper	9	9	0
Unknown	1	1	0
Total	32	37	+5
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

Based on the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Market Share Report, the bank ranked third out of 29 FDIC-insured financial institutions operating in the assessment area, with 7.9 percent market share. The two financial institutions with the largest market shares in the area are The Security National Bank of Sioux City, Iowa with 21.6 percent market share and Wells Fargo Bank, NA with 10.2 percent market share. Deposits in this assessment area represent 21.7 percent of the bank's overall deposit totals.

In 2022, Central Bank ranked second out of 174 entities reporting HMDA lending. A total of 283 transactions were reported by the bank compared to 313 reported by market leader Primebank. The CRA Market Peer Report ranks Central Bank sixth out of 64 reporters with 207 CRA-reportable loans in 2022 compared to 303 loans reported by first ranked JP Morgan Chase Bank, NA.

Additional 2022 assessment area demographic information is presented in the following table.

Central Bank
Storm Lake, Iowa

CRA Performance Evaluation
January 22, 2024

2022 Sioux City, IA-NE-SD MSA 43580 AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	2	5.4	768	2.2	314	40.9	7,311	21.1
Moderate	8	21.6	7,064	20.4	828	11.7	6,133	17.7
Middle	17	45.9	17,855	51.6	1,609	9.0	7,149	20.7
Upper	9	24.3	8,919	25.8	520	5.8	14,013	40.5
Unknown	1	2.7	0	0.0	0	0.0	0	0.0
Total AA	**37**	**100.0**	**34,606**	**100.0**	**3,271**	**9.5**	**34,606**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,576	377	1.1	23.9	957	60.7	242	15.4
Moderate	11,645	5,262	14.9	45.2	5,511	47.3	872	7.5
Middle	29,246	19,328	54.7	66.1	8,122	27.8	1,796	6.1
Upper	13,935	10,392	29.4	74.6	2,711	19.5	832	6.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**56,402**	**35,359**	**100.0**	**62.7**	**17,301**	**30.7**	**3,742**	**6.6**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	192	3.5	156	3.2	36	6.3	0	0.0
Moderate	1,370	25.1	1,130	23.4	232	40.6	8	12.9
Middle	2,466	45.2	2,249	46.6	189	33.1	28	45.2
Upper	1,432	26.2	1,292	26.8	114	20.0	26	41.9
Unknown	1	0.0	1	0.0	0	0.0	0	0.0
Total AA	**5,461**	**100.0**	**4,828**	**100.0**	**571**	**100.0**	**62**	**100.0**
Percentage of Total Businesses:				**88.4**		**10.5**		**1.1**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	2.6	10	2.6	0	0.0	0	0.0
Middle	220	56.6	216	56.3	4	80.0	0	0.0
Upper	159	40.9	158	41.1	1	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**389**	**100.0**	**384**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.7**		**1.3**		**0.0**

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.

Population Characteristics

According to the 2020 U.S. Census Bureau American Community Survey (ACS), population in the assessment area in 2020 was 141,178, which represents a 4.8 percent increase compared to 2015. This growth is comparable to the states of Nebraska and South Dakota, with 4.9 and 5.2 percent growth, respectively. Population growth in the assessment area exceeded the state of Iowa with 3.1 percent growth between 2015 and 2020. While the three counties that make up the assessment area all experienced population growth, Union County, South Dakota experienced the most at 13.3 percent. Woodbury County, Iowa, which makes up most of the population of the assessment area, experienced 3.3 percent increase in population.

According to community representatives, Sioux City, Iowa is primarily responsible for maintaining and growing the population in the area, as many people commute to the city and surrounding areas for employment. Community representatives also noted that there is a need for additional housing in the area so individuals that currently commute into the area for employment can live closer to their workplaces. Representatives noted that these trends are likely to continue; however, they are contingent on employment opportunities in the area and the addition of housing supply.

The following table presents the population trends for the assessment area, counties which make up the assessment area, the state of Iowa, the state of Nebraska, and the state of South Dakota from 2015 to 2020.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change (%)**
Assessment Area	134,767	141,178	4.8
Woodbury County, IA	102,530	105,941	3.3
Dakota County, NE	20,798	21,582	3.8
Union County, SD	14,842	16,811	13.3
Iowa	3,093,526	3,190,369	3.1
Nebraska	1,869,365	1,961,504	4.9
South Dakota	843,190	886,667	5.2
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

Income Characteristics

According to the U.S. Census Bureau, the assessment area is comprised of 34,606 families, which represents a 2.2 percent increase from the previous evaluation. By income category, 21.1 percent are designated as low-income, 17.7 percent are moderate-income, 20.7 percent are middle-income, and 40.5 percent are upper-income families. The percentage of families living below the poverty level within the assessment area is 9.5 percent, which is above the state of Nebraska's, Iowa's, and South Dakota's poverty rates of 6.6, 7.1, and 8.0 percent, respectively.

Overall, the assessment area experienced a significant increase in median family income (MFI) at 26.4 percent, which was significantly above that seen by the states of Iowa, South Dakota, and Nebraska at 7.4, 8.1, and 9.1 percent, respectively. Dakota County contributed to much of the assessment area's growth, with 23.6 percent, while Woodbury and Union Counties saw smaller increases with 13.8 and 6.7 percent, respectively.

Community representatives stated that employers in the area have seen significant growth and have increased wages to attract additional employees. Additionally, cost of living has increased significantly, subsequently incentivizing individuals to ask for higher wages, or move employers for better compensation.

The following table presents the MFI for families living in the assessment area, counties which make up the assessment area, the state of Iowa, the state of Nebraska, and the state of South Dakota from 2015 to 2020.

Median Family Income Change			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change (%)**
Assessment Area	58,887	74,450	26.4
Woodbury County, IA	62,921	71,611	13.8
Dakota County, NE	59,968	74,137	23.6
Union County, SD	89,067	95,000	6.7
Iowa	73,712	79,186	7.4
Nebraska	73,448	80,125	9.1
South Dakota	71,276	77,042	8.1
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

Housing Characteristics

There is a total of 56,402 housing units within the assessment area. The majority of housing units are owner-occupied at 62.7 percent, followed by rental units which comprise 30.7 percent of total units. Vacant units make up 6.6 percent of the housing units in the assessment area. The median age of housing stock in the assessment area is 61 years, which is significantly older than the average in the states of South Dakota, Nebraska, and Iowa at 43, 47, and 50, respectively.

Housing cost burden, presented in the table below, is a method to understand poverty and housing outcomes. The housing cost burden is the ratio of a household's gross monthly housing costs to the household's gross monthly income. Housing cost burden, as defined by the Department of Housing and Urban Development (HUD), takes these quantitative ratios, and

assigns qualitative values to them. If a household's housing cost is above 30.0 percent of its income, then that household is considered housing cost burdened. If housing cost is above 50.0 percent, then the household is severely housing cost burdened. Within the Sioux City MSA, 33.1 percent of all renters are considered housing cost burdened. Of the cost burdened renters, 64.8 percent are low-income, and 20.2 percent are moderate-income. For homeowners, only 12.7 percent are experiencing housing cost burden within the Sioux City MSA. However, those homeowners that do experience burden are low- and moderate-income owners at 51.7 percent and 17.8 percent, respectively.

A community representative noted that due to continued population growth, there is a limited supply of housing, especially affordable housing of all unit types in the area. While there are state and local government programs to subsidize affordable housing for low- and moderate-income individuals, they are rarely utilized as the inventory is not available. Community representatives also noted that new affordable housing developments are rarely considered as return on investment for developers is significantly lower. Lastly, community representatives stated that these trends are likely to continue due to the current interest rate environment limiting new development.

The following table shows the housing cost burden of renters and homeowners in the Sioux City MSA, the counties that make up the assessment area, and the states of Iowa, Nebraska, and South Dakota.

Housing Cost Burden						
	Cost Burden – Renters (%)			Cost Burden – Owners (%)		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Sioux City, IA-NE-SD MSA	64.8	20.2	33.1	51.7	17.8	12.7
Woodbury County, IA	65.3	24.6	35.2	50.9	19.3	12.7
Dakota County, NE	73.4	5.5	30.7	56.3	12.4	13.5
Union County, SD	49.7	14.5	21.9	48.2	18.4	10.4
Iowa	70.6	17.7	37.7	56.8	22.5	15.0
Nebraska	71.0	23.4	36.8	58.9	26.4	15.8
South Dakota	64.8	18.4	34.6	54.0	24.1	15.4
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

Employment Conditions

The unemployment rate for the Sioux City MSA in 2021 was 4.0 percent, which is comparable to the state of Iowa's unemployment rate at 4.2 percent, but slightly higher than the states of Nebraska and South Dakota at 2.5 percent and 3.1 percent, respectively. During the COVID-19

pandemic in 2020, the Sioux City MSA and the state of Iowa saw similar increases in unemployment rates at or above 5.0 percent. The Sioux City MSA, and the state of Iowa maintain elevated unemployment rates when compared to pre-pandemic levels in 2019, while the states of Nebraska and South Dakota have returned to pre-pandemic levels. A community representative stated that, while unemployment remained higher in Woodbury County in 2021, it has continued to decrease and was similar to pre-pandemic levels in 2022. Higher unemployment in Woodbury County, as opposed to Dakota and Union Counties, may be attributed to layoffs by major employers per a community representative.

The table below shows unemployment statistics for the Sioux City MSA, the counties that make up the assessment area, and the states of Iowa, Nebraska, and South Dakota.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Woodbury County, IA	3.1	2.5	2.6	5.1	4.3
Dakota County, NE	4.1	3.6	3.9	4.7	3.0
Union County, SD	3.4	2.9	2.9	4.7	3.6
Sioux City, IA-NE-SD MSA	3.3	2.7	2.8	5.0	4.0
Iowa	3.1	2.5	2.6	5.1	4.2
Nebraska	3.0	2.9	3.0	4.1	2.5
South Dakota	3.1	2.8	2.8	4.3	3.1

Industry Characteristics

According to location quotients developed by the U.S. Bureau of Labor Statistics, the assessment area contains a diverse employment base and is most heavily impacted manufacturing, health care, social assistance, retail, accommodation, and food services industries. Both community representatives noted relative stability in industry conditions.

Community Representatives

Two community representatives were contacted, one from an economic development organization and one from an affordable housing organization. The representatives provided information on housing, employment, and economic development needs within the assessment area, as well as providing information about how the COVID-19 pandemic affected the assessment area economy. There is a substantial demand for housing in the area, including both market rate and affordable housing, driven by the recent population growth in Woodbury County, as noted by one representative. However, another representative noted that a lack of housing units has led to a stall in population growth and workforce issues. Overall, community representatives stated that local financial institutions are active within the community and willing to help address and meet the credit needs of the communities in which they serve, although there are opportunities to better meet housing needs and assist small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SIOUX CITY, IA-NE-SD MSA

LENDING TEST

Central Bank's performance relative to the lending test is rated low satisfactory. Loans reflect adequate geographic distribution throughout the assessment area, and the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different sizes. The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses. The bank made an adequate level of community development loans. Finally, the bank made limited use of innovative or flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

For the purposes of this review, loans made in calendar 2021 and prior were analyzed based on the 2011-2015 American Community Survey income designations data[3]. Loans made in calendar years 2022 and after were analyzed based on income designations from the 2016-2020 American Community Survey data.

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly in low- and moderate-income census tracts. Overall, Central Bank's geographic distribution of HMDA-Reportable and CRA-Reportable small business loans reflects adequate penetration throughout the assessment area. There were no conspicuous lending gaps in the bank's lending distribution across the assessment area, including to low- and moderate-income census tracts.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business lending in relation to census demographics is provided below. Lending distribution tables for 2021 HMDA-reportable lending can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The geographic distribution of HMDA-reportable loans reflects adequate penetration throughout the assessment area. In 2022, Central Bank originated 0.8 percent of its total HMDA-reportable loans in low-income census tracts, which is comparable to the aggregate and percentage of owner-occupied units located in low-income census tracts at 0.9 percent and 1.1 percent, respectively. The bank originated 10.7 percent of its HMDA-reportable loans in moderate-income census tracts, below aggregate at 16.1 percent and below the percentage of owner-occupied units at 14.9 percent.

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[3] *The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)*

The bank originated 51.9 percent of its HMDA-reportable loans in middle-income census tracts. This is comparable to the aggregate and below the percentage of owner-occupied units located in middle-income census tracts at 52.3 percent and 54.7 percent, respectively. Further, the bank originated 36.6 percent of its HMDA-reportable loans in upper-income census tracts, which is above the aggregate at 30.6 percent and the percentage of owner-occupied units located in upper-income census tracts at 29.4 percent.

Due to low volume, home improvement and multi-family loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, the bank made 183 home purchase loans. The bank made 1.1 percent of its loans in low-income census tracts, which was comparable to the performance of the aggregate of lenders at 0.8 percent and the demographic of owner-occupied units in low-income census tracts at 1.1 percent. The bank made 10.4 percent of its home purchase loans in moderate-income census tracts, which was below the performance of the aggregate of lenders at 17.4 percent and below the 14.9 percent demographic of owner-occupied units in moderate-income census tracts. The bank made 54.1 percent of its home purchase loans in middle-income census tracts. This was above the aggregate of lenders at 51.1 percent and comparable to the 54.7 percent demographic of owner-occupied units in middle-income census tracts. Lastly, in 2022 the bank made 34.4 percent of its home purchase loans in upper-income census tracts. This was above the aggregate of lenders at 30.6 percent and the demographic of owner-occupied units in upper-income census tracts at 29.4 percent.

Refinance Loans

In 2022, the bank made 47 refinance loans. The bank made no refinance loans in low-income census tracts, which was comparable to the performance of the aggregate of lenders at 0.9 percent and the demographic of owner-occupied units in low-income census tracts at 1.1 percent. The bank made 6.4 percent of its refinance loans in moderate-income census tracts, which was below the performance of the aggregate of lenders at 12.7 percent and the 14.9 percent of owner-occupied units in moderate-income census tracts. The bank made 46.8 percent of its refinance loans in middle-income census tracts. This was below the aggregate of lenders at 54.4 percent and the 54.7 percent demographic of owner-occupied units in middle-income census tracts. Lastly, in 2022 the bank made 46.8 percent of its refinance loans in upper-income census tracts. This was significantly above the aggregate of lenders at 32.1 percent and the demographic of owner-occupied units in upper-income census tracts at 29.4 percent.

The following table presents the geographic distribution of HMDA-reportable loans in the assessment area in 2022.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Sioux City, IA-NE-SD MSA 43580							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	2	1.1	0.8	209	0.5	0.5	1.1
Moderate	19	10.4	17.4	3,512	7.6	11.5	14.9
Middle	99	54.1	51.1	20,250	44.1	47.7	54.7
Upper	63	34.4	30.6	21,991	47.8	40.3	29.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	183	100.0	100.0	45,962	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.9	0	0.0	0.3	1.1
Moderate	3	6.4	12.7	139	1.1	8.2	14.9
Middle	22	46.8	54.4	3,145	25.5	48.3	54.7
Upper	22	46.8	32.1	9,031	73.3	43.2	29.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	12,315	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.5	0	0.0	0.9	1.1
Moderate	4	30.8	12.8	219	30.2	9.5	14.9
Middle	5	38.5	57.4	112	15.4	52.2	54.7
Upper	4	30.8	29.2	395	54.4	37.4	29.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	726	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	7.4	0	0.0	1.7	6.1
Moderate	0	0.0	42.0	0	0.0	40.6	32.3
Middle	0	0.0	40.7	0	0.0	55.1	42.9
Upper	0	0.0	9.9	0	0.0	2.6	18.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	0.8	0.9	209	0.4	0.6	1.1
Moderate	26	10.7	16.1	3,870	6.6	14.3	14.9
Middle	126	51.9	52.3	23,507	39.8	48.8	54.7
Upper	89	36.6	30.6	31,417	53.2	36.4	29.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	243	100.0	100.0	59,003	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 Loans

The bank's performance with respect to the geographic distribution of small business loans was adequate. In 2022, the bank made 1.1 percent of its small business loans in low-income census tracts, which was comparable to the aggregate of lenders at 3.6 percent and the 3.5 percentage total businesses located in low-income tracts. The bank made 23.4 percent of its small business loans in moderate-income census tracts, which was comparable to the aggregate of lenders at 21.8 percent and the 25.1 percent of total businesses that are in moderate-income tracts. The bank made 17.0 percent of its small business loans in middle-income census tracts, which was significantly below the aggregate of lenders at 39.3 percent and the 45.2 percent of total businesses located in such census tracts. Lastly, the bank made 58.5 percent its small business loans in upper-income census tracts. The bank's performance was significantly above the aggregate of lenders at 34.1 percent and above the 26.2 percent of total businesses that are in such census tracts.

The following table presents the geographic distribution of small business loans in the assessment area in 2022.

Distribution of 2022 Small Business Lending By Income Level of Geography Assessment Area: Sioux City, IA-NE-SD MSA 43580							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Low	2	1.1	3.6	520	1.1	2.7	3.5
Moderate	44	23.4	21.8	12,569	27.3	27.1	25.1
Middle	32	17.0	39.3	7,304	15.9	25.0	45.2
Upper	110	58.5	34.1	25,666	55.7	44.8	26.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.2	0	0.0	0.3	
Total	188	100.0	100.0	46,059	100.0	100.0	100.0
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.							

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

For the purposes of this review, loans made in calendar year 2021 or prior were analyzed based on 2011-2015 American Community Survey income designations for individuals[4]. Loans made in calendar year 2022 or after were analyzed based on 2016-2020 American Community Survey income designations for individuals.

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[4] *Income levels for individuals are calculated annually by the FFIEC using geographic definitions from the OMB, income data from the ACS and the Consumer Price Index from the Congressional Budget Office (.12(m) Income Levels).*

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Storm Lake, Iowa	**January 22, 2024**

An analysis of loans was conducted to determine the level of lending to borrowers of different income levels and businesses of different sizes. Central Bank's lending activities reflect good penetration among individuals of different income levels, including low- and moderate-income borrowers, and businesses of different sizes.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business lending in relation to borrowers of different income levels and businesses of different sizes is provided below. Lending distribution tables for 2021 HMDA-reportable loans can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The borrower distribution of HMDA-reportable loans reflects good penetration among individuals of different income levels, including low- and moderate-income borrowers. In 2022, the bank originated 11.1 percent of its total HMDA-reportable loans to low-income borrowers, which is comparable to the aggregate and below the percentage of low-income families in the assessment area at 11.3 percent and 21.1 percent, respectively. The bank originated 21.0 percent of its HMDA-reportable loans to moderate-income borrowers. This performance is comparable to the aggregate at 23.1 percent and above the percentage of moderate-income families within the assessment area at 17.7 percent. The bank originated 24.7 percent of its HMDA-reportable loans to middle-income borrowers, comparable to the aggregate at 22.8 percent and above the proportion of middle-income families within the assessment area at 20.7 percent. The bank originated the largest share of its HMDA-reportable loans to upper-income borrowers at 40.3 percent, which is significantly above the aggregate but comparable to the percentage of upper-income families in the assessment area at 25.7 percent and 40.5 percent, respectively. Further, the bank originated 2.9 percent of its HMDA-reportable loans to individuals of unknown-income, which was below the aggregate at 17.1 percent.

Due to low volume, home improvement loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, the bank made 11.5 percent of its home purchase loans, by number, to low-income borrowers. Performance was comparable to the aggregate of lenders which made 10.0 percent of these loans and below the 21.1 percent demographic of low-income families within the assessment area. The bank made 23.5 percent of its home purchase loans to moderate-income borrowers, which was consistent with the aggregate of lenders at 23.8 percent and above the 17.7 percent of moderate-income families within the assessment area. The bank made 23.5 percent of its home purchase loans to middle-income borrowers, which was comparable to the aggregate of lenders and the demographic percent of middle-income families within the assessment area, at 21.6 and 20.7 percent, respectively. Further, the bank made 38.8 percent of its home purchase loans to upper-income borrowers, which was significantly above the aggregate of lenders at 23.0 percent

but comparable to the 40.5 percent demographic of upper-income families within the assessment area.

Refinance Loans

In 2022, the bank made 8.5 percent of its refinance loans, by number, to low-income borrowers, performance was below the aggregate of lenders of 14.5 percent and significantly below the 21.1 percent demographic of low-income families within the assessment area. The bank made 14.9 percent of its refinance loans to moderate-income borrowers, which was below the aggregate of lenders at 25.3 percent and below the 17.7 percent demographic of moderate-income families within the assessment area. The bank made 25.5 percent of its refinance loans to middle-income borrowers, which was comparable to the aggregate of lenders at 25.8 percent and above the 20.7 percent of middle-income families within the assessment area. Lastly, the bank made 46.8 percent of its refinance loans to upper-income borrowers, which was significantly above the aggregate of lenders at 25.0 percent and was above the 40.5 percent demographic of upper-income families within the assessment area.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area in 2022.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Sioux City, IA-NE-SD MSA 43580							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	21	11.5	10.0	2,517	5.5	6.1	21.1
Moderate	43	23.5	23.8	7,728	16.8	19.5	17.7
Middle	43	23.5	21.6	8,340	18.1	21.9	20.7
Upper	71	38.8	23.0	26,528	57.7	38.3	40.5
Unknown	5	2.7	21.6	849	1.8	14.1	0.0
Total	183	100.0	100.0	45,962	100.0	100.0	100.0
Refinance Loans							
Low	4	8.5	14.5	280	2.3	8.5	21.1
Moderate	7	14.9	25.3	693	5.6	19.4	17.7
Middle	12	25.5	25.8	1,558	12.7	24.2	20.7
Upper	22	46.8	25.0	9,417	76.5	38.0	40.5
Unknown	2	4.3	9.3	367	3.0	9.9	0.0
Total	47	100.0	100.0	12,315	100.0	100.0	100.0
Home Improvement Loans							
Low	2	15.4	11.3	86	11.8	9.0	21.1
Moderate	1	7.7	13.3	30	4.1	11.8	17.7
Middle	5	38.5	26.2	139	19.1	17.6	20.7
Upper	5	38.5	43.6	471	64.9	53.0	40.5
Unknown	0	0.0	5.6	0	0.0	8.7	0.0
Total	13	100.0	100.0	726	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	27	11.1	11.3	2,883	4.9	6.8	21.1
Moderate	51	21.0	23.1	8,451	14.3	19.1	17.7
Middle	60	24.7	22.8	10,037	17.0	22.1	20.7
Upper	98	40.3	25.7	36,416	61.7	38.8	40.5
Unknown	7	2.9	17.1	1,216	2.1	13.2	0.0
Total	243	100.0	100.0	59,003	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 Loans

In 2022, the distribution of small business loans reflects good penetration among businesses of different sizes. The bank originated 65.4 percent of its business loans to businesses with revenues of $1 million or less. The bank's performance was above that of aggregate lenders at 55.6 percent and below the percentage of total businesses reporting annual revenues of $1 million or less within the assessment area at 88.4 percent. Of the loans made to small businesses with known incomes of

$1 million or less, 48.8 percent were in the amounts of $100,000 or less, which are considered most beneficial to small business credit needs.

The following table presents the bank's borrower distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: Sioux City, IA-NE-SD MSA 43580							
	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	123	65.4	55.6	23,965	52.0	40.9	88.4
Over $1 Million	59	31.4		21,125	45.9		10.5
Revenue Unknown	6	3.2		969	2.1		1.1
Total	188	100.0		46,059	100.0		100.0
By Loan Size							
$100,000 or Less	88	46.8	90.6	5,629	12.2	30.0	
$100,001 - $250,000	47	25.0	4.9	8,459	18.4	17.6	
$250,001 - $1 Million	53	28.2	4.5	31,971	69.4	52.5	
Total	188	100.0	100.0	46,059	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	60	48.8		4,070	17.0		
$100,001 - $250,000	36	29.3		6,300	26.3		
$250,001 - $1 Million	27	22.0		13,595	56.7		
Total	123	100.0		23,965	100.0		
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.*							

Community Development Lending

Central Bank made an adequate level of community development loans and made limited use of innovative or flexible lending practices in serving assessment area credit needs. During the evaluation period, the bank originated three loans totaling $3.6 million in the assessment area. Additionally, the bank originated 61 Paycheck Protection Program (PPP) loans totaling $6.3 million within the assessment area during the evaluation period that qualified for community development credit. When compared to the previous evaluation, the bank increased the number of loans (non-PPP) by 166.7 percent but decreased their dollar volume by 1.9 percent. However, taking into consideration the shorter review period when comparing loans, the monthly average by dollar volume represents an increase of 26.4 percent. The majority of the current period loans'

dollars went to economic development projects, with the remainer used to revitalize and stabilize low- and moderate-income geographies.

The following table presents the bank's qualified community development loans during the review period.

Qualified Community Development Loans by Purpose November 17, 2020 - January 22, 2024									
Assessment Area	**Affordable Housing**		**Community Service**		**Economic Development**		**Revitalize/ Stabilize**		**Total**	
	#	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**	**#**	**$**
Sioux City, IA-NE-SD MSA	0	0	0	0	3	3,646	0	0	3	3,646
PPP	0	0	0	0	1	2,000	60	4,308	61	6,308

INVESTMENT TEST

Central Bank's performance relative to the investment test is rated high satisfactory. The bank made a significant level of qualified community development investments and donations, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made rare use of innovative or complex investments to support community development initiatives; however, the bank exhibited good responsiveness to credit and community development needs as evidenced by making the majority of its investments in organizations that support economic development, an area of need identified by a community representative given the pressure the pandemic has put on local businesses.

During the evaluation period, Central Bank made a total of $14.3 million dollars of qualified investments, each of which is a current period investment and has been fully disbursed. This is a significant increase from the previous evaluation, where the bank made no community development investments within the assessment area.

The following table presents the bank's qualified community development investments during the review period.

Central Bank   **CRA Performance Evaluation**
Storm Lake, Iowa   **January 22, 2024**

Community Development Investments by Purpose (Dollars in 000s) November 17, 2020 - January 22, 2024							
Assessment Area	Current Period				Current Period Total ($)	Prior Period ($)	Total ($)
	Affordable Housing ($)	Community Service ($)	Activities that Revitalize/Stabilize ($)	Economic Development ($)			
Sioux City, IA-NE-SD MSA	0	3,900	0	10,330	14,330	0	14,330

Additionally, Central Bank distributed a total of $167,392 in 85 qualified grants and donations in the current evaluation period. The grants and donations were made to organizations who serve community service and economic development purposes. When compared to the previous evaluation, the bank decreased the dollar amount of donations by 59.2 percent. However, this review period was 11 months shorter than the previous evaluation's review period.

The following table presents the bank's qualified community development grants and donations during the review period.

Qualified Community Development Donations by Purpose November 17, 2020 - January 22, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalize/ Stabilize		Total	
	#	$	#	$	#	$	#	$	#	$
Sioux City, IA-NE-SD MSA	0	0	84	127,392	1	40,000	0	0	85	167,392

SERVICE TEST

Central Bank's performance relative to the service test is rated outstanding. The bank's delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. Services do not vary in a way that inconveniences the needs of its assessment area, particularly low- and moderate-income geographies or low- and moderate-income individuals. The bank is a leader in providing community development services.

Retail Services

The distribution of the branch offices and ATMs is performed using current data (2022) and any changes in the median family income level of the geographies where the branches are located.

The assessment area contains four branches, each with a cash-only ATM, and two loan production offices (LPOs). One LPO has been opened since the previous evaluation. Both LPOs are in moderate-income census tracts, along with one branch and ATM. In addition, two branches with ATMs are in middle-income tracts, and the remaining branch with ATM is in an upper-income tract. The offices and ATMs in the assessment area represent 20.0 percent and 17.4 percent of the institution's total offices and ATMs, respectively, based upon the combined assessment area.

Bank locations are open Monday through Friday with standard hours from 9:00 a.m. to 5:00 p.m., and drive-up available until 5:30 p.m. Additionally, three of the four branches offer drive-up availability from 9:00 a.m. to 12:00 p.m. on Saturdays. The Dakota Dunes branch is not open on Saturday. The bank's ATMs and online and mobile banking services expand the availability of services beyond the branches' regular operating hours. All products and services are consistent among all branches.

Community Development Services

Bank employees provided 2,196 hours within this assessment area, which is 33.9 percent of the total 6,472 total hours of qualified community development services. This represents an increase of 45.0 percent compared to the previous evaluation. The services were performed for several organizations, primarily those who focused on affordable housing, community service, and economic development. The service hours were primarily for leadership roles on boards and committees.

The following table provides a summary of the bank's qualified community development services during the review period.

Community Development Services November 17, 2020 - January 22, 2024				
Assessment Area	**Affordable Housing**	**Community Service**	**Economic Development**	**Revitalize /Stabilize**	**Total Hours**
	# Hours	**# Hours**	**# Hours**	**# Hours**	
Sioux City, IA-NE-SD MSA	82	2,026	88	0	2,196

IOWA

CRA RATING FOR IOWA[5]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Outstanding

Lending Test:
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, adequate penetration among customers of different income levels and business and farms of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms;
- The bank made a relatively high level of community development loans; and
- Limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:
- An adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position;
- The bank made rare use of innovative and/or complex investments to support community development initiatives; and
- The bank exhibits an adequate responsiveness to credit and community development.

Service Test:
- The bank service delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas;
- To the extent changes have been made, its record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals;
- The bank's services and business hours do not vary in a way that inconveniences the needs of its assessment area. Particularly to low- and moderate-income geographies and/or low- and moderate-income individuals; and
- The bank is a leader in providing community development services.

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[5] *For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.*

SCOPE OF EXAMINATION

The rating is based on a full review of the institution's performance in the Des Moines–West Des Moines, IA MSA #19780, and Non-MSA Buena Vista and Cherokee County, IA; as well as the limited scope assessment area of Non-MSA Dickinson County, IA. The scope for the assessment area is consistent with that presented in the Scope of Examination section of the performance evaluation. Refer to the more detailed discussion of the scope in the overall summary section for more details.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IOWA

Central Bank's operations in the state of Iowa consist of three assessment areas: Des Moines –West Des Moines, IA MSA #19780, comprised of Polk and Dallas Counties, each county in its entirety, Non-MSA Buena Vista and Cherokee Counties, IA, each county in its entirety, and Non-MSA Dickinson County, IA in its entirety. In 2022, the bank operated 12 of its 20 branches, including the main office, in the state of Iowa (this does not include branches located in Multi-state MSA, which are in the state of Iowa, but included in the context of the evaluation of operations in the Sioux City MSA). These locations serve the cities of Des Moines, West Des Moines, Waukee, Ankeny, Urbandale, Storm Lake, Cherokee, and Spirit Lake. Please refer to the individual assessment area summaries for detailed demographic and economic conditions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

LENDING TEST

Central Bank's performance relative to the lending test is rated high satisfactory based on its performance across the two full-scope assessment areas in the state of Iowa, which included the Des Moines – West Des Moines MSA assessment area and the Non-MSA Buena Vista and Cherokee Counties assessment area. Loans reflect adequate geographic distribution throughout the assessment area, including low- and moderate-income geographies. The bank demonstrates an adequate distribution of loans among individuals of different income levels and businesses (including farms) of different sizes. The bank has a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms and made a relatively high level of community development loans. Finally, the bank made limited use of innovative or flexible lending practices in serving assessment area credit needs.

Geographic and Borrower Distribution of Loans

The geographic distribution of HMDA-reportable and CRA-reportable small business and small farm loans reflects adequate dispersion throughout the assessment area. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses and farms of different sizes. Please refer to the individual assessment area summary sections for details.

Community Development Lending

The bank made a relatively high level of community development loans in the state of Iowa and made limited use of innovative and/or flexible lending practices in serving assessment area credit needs. Specifically, the bank originated (non-PPP) community development loans totaling $42.0 million, and $6.0 million in qualified community development PPP loans in the full review assessment areas. Community development loans supported efforts to provide affordable housing, community services, economic development, and revitalization and stabilization. Please refer to the individual assessment areas for more information.

INVESTMENT TEST

Central Bank's performance relative to the investment test is rated low satisfactory. Central Bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. The bank made rare use of innovative and/or complex investments to support community initiatives. The bank demonstrates adequate responsiveness to credit and community development needs. During the review period, the bank made or maintained investments totaling $3.1 million in the full review assessment areas. Furthermore, 106 donations totaling $240,402 were made in the full review assessment areas. Please refer to individual assessment areas for more information.

SERVICE TEST

Central Bank's performance relative to the lending test is rated outstanding. Central Bank's delivery systems are accessible to all portions of the assessment areas. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. The bank's services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. The bank is a leader in providing community development services.

Retail Services

Central Banks's delivery systems are accessible to all portions of the bank's assessment areas, including low- and moderate-income individuals and geographies. The bank operates a total of 11 offices and 12 cash-only ATMs in the state of Iowa. Although branch offices are not evenly distributed throughout the assessment area, they are accessible to low- and moderate- income individuals throughout the assessment area. Alternative delivery systems include phone, internet banking and mobile banking. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals or geographies. Since the previous evaluation, the bank closed two full-service branches, and one cash-only ATM, all of which were in a middle-income census tract. The bank

also closed a limited-service branch with a cash-only ATM in an upper-income census tract. Bank hours and services are reasonable and do not vary in a way that inconveniences low- and moderate-income individuals or geographies. Office hours are typically 8:30-9:00 a.m. to 4:00-5:00 p.m., Monday through Friday. Multiple locations also provide drive-up services with extended hours and services on Saturday. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website. Please refer to the individual assessment areas for more information.

Community Development Services

The bank is a leader in providing community development services within the state of Iowa. A total of 3,215 community development service hours were provided by bank employees in the full review assessment areas within the state of Iowa. Services included participating on the boards of local organizations, providing homeownership counseling through local nonprofits, and school programs that provide services to low- and moderate-income individuals or geographies. Please refer to the individual assessment areas for more information.

DES MOINES-WEST DES MOINES, IA #19780 - Full Review

SCOPE OF THE EXAMINATION

Full scope review examination procedures were used to evaluate the bank's performance in the Des Moines–West Des Moines, IA MSA assessment area. The scope of this section is consistent with the overall scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" contained in the introduction of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DES MOINES-WEST DES MOINES, IA #19780

The bank maintains a partial Des Moines-West Des Moines, Iowa MSA assessment area that consists of Polk and Dallas Counties in their entireties. There have been no changes to the bank's assessment area since the previous evaluation. The bank operates eight full-service branches and seven cash-only ATMs: three in Des Moines with two ATMs, one in West Des Moines with an ATM, one in Ankeny with an ATM, one in Waukee with an ATM, and two in Urbandale both with ATMs. In 2022, the assessment area was comprised of 131 census tracts: consisting of eight low-, 31 moderate-, 57 middle-, 33 upper-, and two unknown- income census tracts. The Des Moines International Airport is in one of the unknown census tracts while another is in a commercial area near the I-80 and I-235 intersection.

Tract Designation Change Data

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

The following shows the changes of designation of census tracts by income since the previous evaluation.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	9	8	-1
Moderate	29	31	+2
Middle	45	57	+12
Upper	29	33	+4
Unknown	1	2	+1
Total	113	131	+18
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

Based on the June 30, 2022, FDIC Deposit Market Share Report, the bank ranked 10th out of 48 FDIC-insured financial institutions operating in the assessment area with 1.6 percent market share. Deposits from this assessment area comprise 29.7 percent of total bank deposits, making it the assessment area with the greatest share of deposits. The top three financial institutions with the largest market share in the area are Principal Bank (27.2 percent), Wells Fargo Bank, NA (13.8 percent), and Bankers Trust Company (12.3 percent). Overall, the banking environment in the assessment area is competitive, with the top three financial institutions holding 53.3 percent of the area's deposits, and the remaining 45 financial institutions vying for the remaining 46.7 percent of the market.

Central Bank ranked 24th out of 386 entities reporting HMDA lending in 2022, which reflects the competitiveness of the MSA. A total of 231 originations and purchase transactions were reported by the bank compared to 3,172 reported by market leader Greenstate Credit Union. Further, the CRA Market Peer Report ranks Central Bank 17th out of 117 reporters with 133 CRA-reportable loans in 2022 compared to 2,613 loans reported by first ranked American Express, NB.

Additional 2022 assessment area demographic information is presented in the following table.

2022 Des Moines-West Des Moines, IA MSA 19780 AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	8	6.1	6,644	4.7	1,584	23.8	27,971	19.9
Moderate	31	23.7	26,189	18.6	3,408	13.0	25,090	17.8
Middle	57	43.5	64,408	45.8	3,061	4.8	30,331	21.6
Upper	33	25.2	42,842	30.5	1,209	2.8	57,235	40.7
Unknown	2	1.5	544	0.4	0	0.0	0	0.0
Total AA	**131**	**100.0**	**140,627**	**100.0**	**9,262**	**6.6**	**140,627**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	11,974	5,219	3.4	43.6	5,542	46.3	1,213	10.1
Moderate	50,963	27,528	17.9	54.0	18,712	36.7	4,723	9.3
Middle	108,297	72,002	46.8	66.5	30,077	27.8	6,218	5.7
Upper	68,209	48,361	31.5	70.9	16,884	24.8	2,964	4.3
Unknown	2,436	592	0.4	24.3	1,591	65.3	253	10.4
Total AA	**241,879**	**153,702**	**100.0**	**63.5**	**72,806**	**30.1**	**15,371**	**6.4**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	1,123	4.3	958	4.1	154	6.6	11	4.0
Moderate	4,271	16.3	3,821	16.2	416	17.9	34	12.2
Middle	11,261	43.0	10,315	43.8	843	36.4	103	37.1
Upper	8,724	33.3	7,807	33.1	790	34.1	127	45.7
Unknown	787	3.0	669	2.8	115	5.0	3	1.1
Total AA	**26,166**	**100.0**	**23,570**	**100.0**	**2,318**	**100.0**	**278**	**100.0**
Percentage of Total Businesses:			**90.1**		**8.9**		**1.1**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	11	1.7	10	1.6	1	7.7	0	0.0
Moderate	40	6.3	38	6.1	2	15.4	0	0.0
Middle	301	47.4	296	47.7	4	30.8	1	100.0
Upper	279	43.9	275	44.3	4	30.8	0	0.0
Unknown	4	0.6	2	0.3	2	15.4	0	0.0
Total AA	**635**	**100.0**	**621**	**100.0**	**13**	**100.0**	**1**	**100.0**
Percentage of Total Farms:			**97.8**		**2.0**		**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.

Population Characteristics

According to the U.S. Census Bureau's 2020 Decennial Census, the assessment area's population is 563,330. This represents a 12.4 percent increase in population from 2015. The entire Des Moines-West Des Moines MSA had a population increase at a comparable rate of 11.2 percent during the same period, while the state of Iowa saw a slower population growth rate of 3.1 percent. While most of the assessment area's population resides in Polk County, the assessment area's growth was primarily in Dallas County, where the population increased by a third from 2015 to 2020. Both community representatives noted that the population growth in Dallas County is due in large part to the higher availability of open land for new housing.

The following table presents the population trends for the assessment area, counties within the assessment area, the Des Moines-West Des Moines, IA MSA, and the state of Iowa from 2015 to 2020.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percentage Change (%)**
Assessment Area	501,154	563,330	12.4
Dallas County, IA	74,892	99,678	33.1
Polk County, IA	452,369	492,401	8.8
Des Moines-West Des Moines, IA MSA	637,913	709,466	11.2
Iowa	3,093,526	3,190,369	3.1
Source: 2011-2015 U.S. Census Bureau American Community Survey and 2020 U.S. Census Bureau Decennial Census			

Income Characteristics

According to 2022 FFIEC Census Data, the assessment area is comprised of 140,627 families, of which 19.9 percent are designated as low-income and 17.8 percent are designated as moderate-income. Families living below the poverty level within the assessment area is at 6.6 percent, which is below the state of Iowa's poverty rate of 7.1 percent. Dallas County has seen the highest growth in median family income (MFI) (inflation adjusted) from 2015 to 2020 at 13.7 percent. Polk County's MFI has grown at less than half of that in the same period at 6.5 percent. The state of Iowa's MFI increase of 7.4 percent is more comparable to Polk County. Further, Dallas County's 2020 MFI of $114,777 is significantly higher than both Polk County and the state of Iowa.

A community representative stated that Dallas County's higher MFI compared to Polk County is due to housing developments where a lot of new homes are being built that require higher incomes for purposes of affordability.

The following table presents median family incomes for families living in Polk and Dallas Counties, the Des Moines-West Des Moines IA MSA, and the state of Iowa.

Median Family Income Change 2015 and 2020			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percentage Change (%)
Dallas County, IA	100,985	114,777	13.7
Polk County, IA	81,217	86,525	6.5
Des Moines-West Des Moines, IA MSA	82,657	89,538	8.3
Iowa	73,712	79,186	7.4
Source: 2011 – 2015 and 2016-2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

There are 241,879 housing units in the assessment area. Most housing is owner-occupied, at 63.5 percent, whereas rentals comprise 30.1 percent of housing units; 6.4 percent of housing units are currently vacant, which is lower than the state of Iowa's average of 9.5 percent.

Households are considered housing cost burdened when their gross monthly housing costs in relation to gross monthly income is above 30.0 percent. As shown in the table below, large percentages of both low- and moderate-income households, whether they are renters or homeowners, are housing cost burdened. Community representatives indicated that there is a housing shortage in Dallas and Polk Counties in addition to increasing land and construction prices. Existing affordable housing is generally older housing stock located in Polk County. The median age of housing stock in assessment area counties also differs substantially between Dallas and Polk County, at 17 and 42 years, respectively, reflecting the significant growth in new housing demand experienced in Dallas County due to population increases.

The following table presents housing cost burden of renters and homeowners in Polk and Dallas Counties, the Des Moines-West Des Moines IA MSA, and the state of Iowa.

Des Moines-West Des Moines, IA MSA Housing Cost Burden						
	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Dallas County, IA	74.7	32.1	35.2	55.8	21.8	11.8
Polk County, IA	78.2	20.1	40.2	65.2	30.8	16.9
Des Moines-West Des Moines, IA MSA	76.5	20.4	38.8	62.8	29.2	16.2
Iowa	70.6	17.7	37.7	56.8	22.5	15.0
Cost Burden is housing cost that equals 30 percent or more of household income. *Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*						

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Employment Conditions

After reaching their peak in 2020 during the COVID-19 pandemic, the 2021 unemployment rate in Polk County declined to 4.5 percent, similar to the state of Iowa rate of 4.2 percent; Dallas County's unemployment rate was lower, at 2.9 percent. A community representative stated that unemployment is historically low for the area. They also indicated that businesses are having difficulty attracting applicants as the area has a workforce shortage.

The table below shows unemployment statistics for Polk and Dallas Counties, the Des Moines-West Des Moines IA MSA, and the state of Iowa.

Unemployment Rates (%)					
Area	**2017**	**2018**	**2019**	**2020**	**2021**
Dallas County, IA	2.1	1.7	1.8	3.5	2.9
Polk County, IA	3.0	2.6	2.7	5.9	4.5
Des Moines-West Des Moines, IA MSA	2.9	2.4	2.6	5.4	4.2
Iowa	3.1	2.5	2.6	5.1	4.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

Industry Characteristics

According to the U.S. Bureau of Labor Statistics, the assessment area contains a diverse employment base and is most heavily impacted by the professional and technical services, health care, retail, and wholesale trade industries. Two large healthcare providers, UnityPoint Health Alliance and Mercy One, have multiple hospitals and clinics in the assessment area. A community representative stated one of the largest needs in the area is attracting more service workers to the hospitality industry. Wells Fargo continues to be one of the largest employers in the region; however, the bank has decreased its geographic and labor footprint in the area and moved all employees, previously dispersed throughout multiple office locations in Polk and Dallas Counties, to its West Des Moines campus in Dallas County. Additionally, Des Moines houses a large percentage of government workers because it is the state capital of Iowa.

Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on population, income, housing, employment, and economic development needs within the assessment area, as well as how the COVID-19 pandemic effected the local economy. One representative stated there was a need for more affordable housing in both Polk and Dallas Counties. Of note, the representative stated there is a need for home improvement assistance given the aging housing stock in Polk County, specifically assistance that does not rely on typical underwriting criteria such as credit scores. Further, labor shortages were identified as a continued area of concern given the low unemployment rate and the continuing growth in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS DES MOINES-WEST DES MOINES, IA #19780

LENDING TEST

The geographic distribution of loans reflects adequate penetration throughout the assessment area and the distribution of borrowers reflects, given the product lines offered, adequate penetration among individuals of different income levels and businesses of different sizes. The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and made a relatively high level of community development loans. The bank made limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

For the purposes of this review, loans made in calendar 2021 and prior were analyzed based on the 2011-2015 American Community Survey income designations data[6]. Loans made in calendar years 2022 and after were analyzed based on income designations from the 2016-2020 American Community Survey data.

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly in low- and moderate-income census tracts. Overall, Central Bank's geographic distribution of HMDA-Reportable and CRA-Reportable small business loans reflects adequate penetration throughout the assessment area. There were no conspicuous lending gaps in the bank's lending distribution across the assessment area, including to low- and moderate-income census tracts.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business lending in relation to census demographics is provided below. Due to volume, HMDA-reportable lending was given slightly more weight. Lending distribution tables reflecting 2021 HMDA-reportable lending can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The geographic distribution of HMDA-reportable loans reflects adequate penetration throughout the assessment area. In 2022, Central Bank originated 1.6 percent of its total HMDA-reportable loans in low-income census tracts, which is comparable to the aggregate and percentage of owner-occupied units located in low-income census tracts at 3.2 percent and 3.4 percent, respectively. The bank originated 6.8 percent of its HMDA-reportable loans in moderate-income census tracts, below aggregate at 16.5 percent and significantly below the percentage of owner-occupied units at 17.9 percent. The bank originated 40.6 percent of its HMDA-reportable loans in middle-income census

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[6] *The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)*

tracts. This is below the aggregate and the percentage of owner-occupied units located in middle-income census tracts at 43.8 percent and 46.8 percent, respectively. Further, the bank originated 50.5 percent of its HMDA-reportable loans in upper-income census tracts, which is significantly above the aggregate at 36.1 percent and the percentage of owner-occupied units located in upper-income census tracts at 31.5 percent.

Due to low volume, home improvement and multi-family loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was below its performance in 2021, specifically lending in moderate-income census tracts where the bank's home mortgage loans were comparable to aggregate and demographic performance.

Home Purchase Loans

In 2022, Central Bank originated 1.5 percent of home purchase loans in low-income census tracts, which is comparable to the aggregate and percentage of owner-occupied units located in low-income census tracts at 3.3 percent and 3.4 percent, respectively. The bank originated 8.1 percent of its home purchase loans in moderate-income census tracts, below aggregate at 17.0 percent and the percentage of owner-occupied units at 17.9 percent. The bank originated 40.4 percent of its home purchase loans in middle-income census tracts. This is comparable to the aggregate but below the percentage of owner-occupied units located in middle-income census tracts at 42.9 percent and 46.8 percent, respectively. Further, the bank originated 49.3 percent of its home purchase loans in upper-income census tracts, which is significantly above the aggregate at 36.4 percent and the percentage of owner-occupied units located in upper-income census tracts at 31.5 percent.

Refinance Loans

In 2022, Central Bank originated no refinance loans in low-income census tracts, which is below the aggregate and the percentage of owner-occupied units located in low-income census tracts at 3.6 percent and 3.4 percent, respectively. The bank originated 4.1 percent of its refinance loans in moderate-income census tracts, significantly below aggregate at 17.5 percent and the percentage of owner-occupied units at 17.9 percent. The bank originated 36.7 percent of its refinance loans in middle-income census. This is below the aggregate and the percentage of owner-occupied units located in middle-income census tracts at 45.7 percent and 46.8 percent, respectively. Further, the bank originated 59.2 percent of its refinance loans in upper-income census tracts, which is significantly above the aggregate at 33.0 percent and the percentage of owner-occupied units located in upper-income census tracts at 31.5 percent.

The following table presents the bank's geographic distribution of HMDA-reportable loans in 2022.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Des Moines-West Des Moines, IA MSA 19780							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	2	1.5	3.3	130	0.4	1.8	3.4
Moderate	11	8.1	17.0	1,989	5.4	10.7	17.9
Middle	55	40.4	42.9	12,677	34.4	40.6	46.8
Upper	67	49.3	36.4	21,794	59.1	46.6	31.5
Unknown	1	0.7	0.4	282	0.8	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	136	100.0	100.0	36,872	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.6	0	0.0	2.1	3.4
Moderate	2	4.1	17.5	193	1.8	11.2	17.9
Middle	18	36.7	45.7	3,324	30.2	41.5	46.8
Upper	29	59.2	33.0	7,482	68.0	45.1	31.5
Unknown	0	0.0	0.3	0	0.0	0.2	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	49	100.0	100.0	10,999	100.0	100.0	100.0
Home Improvement Loans							
Low	1	25.0	1.9	101	44.7	1.3	3.4
Moderate	0	0.0	12.0	0	0.0	9.1	17.9
Middle	3	75.0	45.8	125	55.3	40.7	46.8
Upper	0	0.0	40.0	0	0.0	48.7	31.5
Unknown	0	0.0	0.3	0	0.0	0.2	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	226	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	4.9	0	0.0	0.7	6.0
Moderate	0	0.0	31.9	0	0.0	6.9	20.6
Middle	2	66.7	31.9	2,358	67.4	23.4	41.0
Upper	1	33.3	29.9	1,140	32.6	66.9	29.1
Unknown	0	0.0	1.5	0	0.0	2.1	3.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	3,498	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	3	1.6	3.2	231	0.4	1.6	3.4
Moderate	13	6.8	16.5	2,182	4.2	10.0	17.9
Middle	78	40.6	43.8	18,484	35.8	37.7	46.8
Upper	97	50.5	36.1	30,416	59.0	50.0	31.5
Unknown	1	0.5	0.4	282	0.5	0.6	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	192	100.0	100.0	51,595	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.

<u>Small Business Loans</u>

The geographic distribution of small business loans reflects good penetration throughout the assessment area. In 2022, Central Bank originated 2.3 percent of its small business loans in low-income census tracts, comparable to the aggregate at 3.4 percent and the percentage of total businesses located in low-income census tracts at 4.3 percent. The bank originated 14.8 percent of its small business loans in moderate-income census tracts, also comparable to the aggregate at 14.2 percent and the percentage of total businesses located in moderate-income census tracts at 16.3 percent. Additionally, the bank originated 41.4 percent of its small business loans in middle-income census tracts, which was again comparable to the aggregate and the percentage of total businesses located in middle-income census tracts at 42.3 percent and 43.0 percent, respectively. Further, the bank originated 38.3 percent of its small business loans in upper-income census tracts, which was also comparable to the aggregate at 37.3 percent and above the percentage of total businesses located in upper-income census tracts at 33.3 percent.

The following table presents the bank's geographic distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Income Level of Geography Assessment Area: Des Moines-West Des Moines, IA MSA 19780							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Low	3	2.3	3.4	1,983	5.3	5.4	4.3
Moderate	19	14.8	14.2	4,817	12.9	14.4	16.3
Middle	53	41.4	42.3	16,764	44.8	37.6	43.0
Upper	49	38.3	37.3	12,745	34.1	39.2	33.3
Unknown	4	3.1	2.2	1,100	2.9	3.3	3.0
Tract-Unk	0	0.0	0.5	0	0.0	0.2	
Total	128	100.0	100.0	37,409	100.0	100.0	100.0
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.							

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

For the purposes of this review, loans made in calendar year 2021 or prior were analyzed based on 2011-2015 American Community Survey income designations for individuals[7]. Loans made in calendar year 2022 or after were analyzed based on 2016-2020 American Community Survey income designations for individuals.

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[7] *Income levels for individuals are calculated annually by the FFIEC using geographic definitions from the OMB, income data from the ACS and the Consumer Price Index from the Congressional Budget Office (.12(m) Income Levels).*

An analysis of loans was conducted to determine the level of lending to borrowers of different income levels and businesses of different sizes. Central Bank's lending activities reflect adequate penetration among individuals of different income levels, including low- and moderate-income borrowers, and businesses of different sizes.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business lending in relation to borrowers of different income levels and businesses of different sizes is provided below. Lending distribution tables for 2021 HMDA-reportable lending can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The borrower distribution of HMDA-reportable loans reflects adequate penetration among individuals of different income levels, including low- and moderate-income borrowers. In 2022, the bank originated 6.9 percent of its total HMDA-reportable loans to low-income borrowers, which is below the aggregate and significantly below the percentage of low-income families in the assessment area at 11.0 percent and 19.9 percent, respectively. The bank originated 14.3 percent of its HMDA-reportable loans to moderate-income borrowers. This performance is below the aggregate at 22.2 percent and the percentage of moderate-income families within the assessment area at 17.8 percent. The bank originated 15.3 percent of its HMDA-reportable loans to middle-income borrowers, below the aggregate at 21.5 percent and the proportion of middle-income families within the assessment area at 21.6 percent. The bank originated the largest share of its HMDA-reportable loans to upper-income borrowers at 39.2 percent, which is above the aggregate and comparable to the percentage of upper-income families in the assessment area at 29.9 percent and 40.7 percent, respectively. Further, the bank originated 24.3 percent of its HMDA-reportable loans to individuals of unknown-income, which was above the aggregate at 15.4 percent. This high percentage of loans to borrowers of unknown income had the effect of reducing the percentage of loans to borrowers with known income and was considered when assessing conclusions.

Due to low volume, home improvement loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, the bank originated 8.1 percent of its home purchase loans to low-income borrowers, which is comparable to the aggregate but below the percentage of low-income families in the assessment area at 11.8 percent and 19.9 percent, respectively. The bank originated 16.9 percent of its home purchase loans to moderate-income borrowers. This performance is below the aggregate at 24.2 percent but comparable to the percentage of moderate-income families within the assessment area at 17.8 percent. The bank originated 16.2 percent of its home purchase loans to middle-income borrowers, below the aggregate at 21.3 percent and the proportion of middle-income families within the assessment area at 21.6 percent. The bank originated the highest proportion of its home purchase loans to upper-income borrowers at 35.3 percent, which is above

the aggregate but below the percentage of upper-income families in the assessment area at 25.8 percent and 40.7 percent, respectively. Further, the bank originated 23.5 percent of its home purchase loans to individuals of unknown income, above the aggregate at 17.0 percent.

Refinance Loans

In 2022, the bank originated 4.1 percent of its refinance loans to low-income borrowers, which is below the aggregate and significantly below the percentage of low-income families in the assessment area at 12.2 percent and 19.9 percent, respectively. The bank originated 8.2 percent of its refinance loans to moderate-income borrowers. This performance is significantly below the aggregate at 20.8 percent and below the percentage of moderate-income families within the assessment area at 17.8 percent. The bank originated 12.2 percent of its refinance loans to middle-income borrowers, below the aggregate at 19.7 percent and the proportion of middle-income families within the assessment area at 21.6 percent. The bank originated the highest proportion of its refinance loans to upper-income borrowers at 49.0 percent, which is significantly above the aggregate and above the percentage of upper-income families in the assessment area at 29.1 percent and 40.7 percent, respectively. Further, the bank originated 26.5 percent of its refinance loans to individuals of unknown-income, above aggregate at 18.1 percent.

The following table presents the bank's borrower distribution of HMDA-reportable loans in 2022.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Des Moines-West Des Moines, IA MSA 19780						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	11	8.1	11.8	1,479	4.0	6.4	19.9
Moderate	23	16.9	24.2	4,453	12.1	18.2	17.8
Middle	22	16.2	21.3	5,951	16.1	21.6	21.6
Upper	48	35.3	25.8	18,592	50.4	36.1	40.7
Unknown	32	23.5	17.0	6,397	17.3	17.7	0.0
Total	136	100.0	100.0	36,872	100.0	100.0	100.0
Refinance Loans							
Low	2	4.1	12.2	255	2.3	6.5	19.9
Moderate	4	8.2	20.8	535	4.9	15.3	17.8
Middle	6	12.2	19.7	596	5.4	17.8	21.6
Upper	24	49.0	29.1	6,795	61.8	42.5	40.7
Unknown	13	26.5	18.1	2,818	25.6	17.8	0.0
Total	49	100.0	100.0	10,999	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.2	0	0.0	4.7	19.9
Moderate	0	0.0	16.8	0	0.0	10.4	17.8
Middle	1	25.0	24.8	40	17.7	20.5	21.6
Upper	2	50.0	48.4	85	37.6	59.9	40.7
Unknown	1	25.0	2.7	101	44.7	4.5	0.0
Total	4	100.0	100.0	226	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	13	6.9	11.0	1,734	3.6	6.3	19.9
Moderate	27	14.3	22.2	4,988	10.4	17.1	17.8
Middle	29	15.3	21.5	6,587	13.7	20.7	21.6
Upper	74	39.2	29.9	25,472	53.0	38.9	40.7
Unknown	46	24.3	15.4	9,316	19.4	17.0	0.0
Total	189	100.0	100.0	48,097	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 Loans

The distribution of small business loans reflects good penetration among businesses of different revenue sizes. In 2022, Central Bank origination 59.4 percent of its business loans to businesses reporting annual revenues of $1 million or less, which was above the aggregate at 49.5 percent and significantly below the percentage of businesses with gross revenues of $1 million or less at 90.1 percent. Of loans to businesses with revenues of $1 million or less, 36.8 percent were in amounts of

$100,000 or less. Loans in amounts of $100,000 or less are generally considered most beneficial for small businesses.

The following table presents the bank's borrower distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: Des Moines-West Des Moines, IA MSA 19780							
	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	76	59.4	49.5	21,372	57.1	34.2	90.1
Over $1 Million	48	37.5		15,080	40.3		8.9
Revenue Unknown	4	3.1		957	2.6		1.1
Total	128	100.0		37,409	100.0		100.0
By Loan Size							
$100,000 or Less	45	35.2	91.3	3,021	8.1	30.0	
$100,001 - $250,000	31	24.2	4.0	6,171	16.5	14.1	
$250,001 - $1 Million	52	40.6	4.7	28,217	75.4	55.9	
Total	128	100.0	100.0	37,409	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	28	36.8		1,880	8.8		
$100,001 - $250,000	19	25.0		3,649	17.1		
$250,001 - $1 Million	29	38.2		15,843	74.1		
Total	76	100.0		21,372	100.0		
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.							

Community Development Lending

Central Bank made a relatively high level of community development loans and made limited use of innovative or flexible lending practices in serving assessment area credit needs. During the review period, the bank originated 12 community development loans totaling $23.9 million. The largest portion of community development loans were focused on revitalization and stabilization of low- and/or moderate-income areas within the assessment area. Further, the bank originated 41 PPP loans totaling 4.2 million dollars that qualified for community development. Despite the shorter review period for this exam, the bank's current performance in community development lending (non-PPP) increased 210.7 percent by dollar volume when compared to the previous evaluation.

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The following table presents the bank's qualified community development loans during the review period.

Community Development Loans November 17, 2020 - January 22, 2024										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize/ Stabilize**		**Total #**	**Total $(000s)**
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000)**		
Des Moines-West Des Moines, IA MSA	4	6,620	3	5,712	3	3,661	2	8,000	12	23,993
PPP	0	0	0	0	2	3,035	39	1,209	41	4,244

INVESTMENT TEST

Central Bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. Also, the bank made rare use of innovative or complex investments to support community initiatives and demonstrates adequate responsiveness to credit and community development needs.

During the evaluation period, the bank made two community development investments totaling $1.1 million within the assessment area. The larger investment of the two was in the amount of $1.0 million to a college that is developing a jobs training program designed to help lower-income individuals gain skills for career advancement. During the previous evaluation, the bank did not make or maintain any investments within the assessment area.

The following table presents the bank's qualified community development investments during the review period.

Community Development Investments by Purpose (Dollars in 000s) November 17, 2020 - January 22, 2024							
Assessment Area	**Current Period**				**Current Period Total ($)**	**Prior Period ($)**	**Total ($)**
	Affordable Housing ($)	**Community Service ($)**	**Activities that Revitalize/Stabilize ($)**	**Economic Development ($)**			
Des Moines-West Des Moines, IA MSA	0	0	75	1,000	1,075	0	1,075

Additionally, Central Bank distributed 56 donations totaling $185,190 to organizations within the assessment area during the evaluation period. Donations were made to a variety of organizations with most donations, by dollar volume, towards community service efforts targeting low- and moderate-income individuals and communities (70.0 percent). Despite this review period being shorter in duration than the previous evaluation's review period, the bank's current performance in community development donations increased by 2.6 percent in total dollar amount.

The following table presents the bank's qualified community development grants and donations during the review period.

Qualified Community Development Donations by Purpose November 17, 2020 - January 22, 2024											
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalize/ Stabilize		Total	
	#	$	#	$	#	$	#	$	#	$
Des Moines-West Des Moines, IA MSA	8	55,500	48	129,690	0	0	0	0	56	185,190

SERVICE TEST

Central Bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. The bank is a leader in providing community development services in the assessment area.

Retail Services

The distribution of the branch offices and ATMs is performed using current data (2022) and any changes in the median family income level of the geographies where the branches are located.

The assessment area contains eight branches with seven cash-only ATMs. There have not been any branch openings or closings since the previous evaluation. The bank operates two of the eight branches in moderate-income census tracts within the City of Des Moines. In addition, five branches with cash-only ATMs are in middle-income tracts, and the remaining branch with a cash-only ATM is in an upper-income tract. The offices in the assessment area represent 40.0 percent of the institution's total offices, based upon the combined assessment area.

Bank locations are typically open Monday through Friday with standard hours from 9:00 a.m. to 5:00 p.m., and drive-up available until 5:30 p.m. The bank's ATMs and online and mobile banking services expand the availability of services beyond the branches' regular operating hours. All

products and services are consistent among all branches.

Community Development Services

During the review period, the bank provided 1,995 community development services. As illustrated in the following table, most community development services had a focus of community services targeting low- and moderate-income individuals. Despite the shorter review period for this evaluation, the bank's current performance in community development service hours increased by 18.6 percent when compared to the previous evaluation.

The following table presents the bank's qualified community development services during the review period.

Community Development Services November 17, 2020 - January 22, 2024					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize/ Stabilize**	**Total Hours**
	Hours	**Hours**	**Hours**	**Hours**	
Des Moines-West Des Moines, IA MSA	327	1,668	0	0	1,995

NON-METROPOLITAN BUENA VISTA & CHEROKEE COUNTY, IA - Full Review

SCOPE OF THE EXAMINATION

Full scope review examination procedures were used to evaluate the bank's performance in the Buena Vista and Cherokee Counties IA, Non-MSA assessment area. The scope of this section is consistent with the overall scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" contained in the introduction of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN BUENA VISTA & CHEROKEE COUNTY, IA [8]

The bank's operations in the Non-Metropolitan Buena Vista and Cherokee Counties, located in the state of Iowa, are comparable to overall bank operations. The assessment area consists of Buena Vista and Cherokee Counties in their entireties and as of 2022, is comprised of 11 census tracts, including one moderate-, eight middle-, and two upper-income census tracts. There have been no changes to the assessment area since the previous evaluation. The bank operates three locations (including the main office) and five cash-only ATMs. Since the previous evaluation, the bank closed two branches located in middle-income census tracts, and one limited-service branch located in an upper-income census tract.

Tract Designation Change Data

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey (ACS) and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

The following shows the changes in census tract designations by income since the previous evaluation.

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[8] *Census tract designations are based on American Community Survey income data. For years 2022 and after, the designations are based on 2016-2020 ACS data. For years 2021 and before, the designations are based on 2011-2015 ACS data. For examinations that include performance before and after 2022, both sets of data have been used to perform the analysis of bank activity in the respective timeframes.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	0	0
Moderate	1	1	0
Middle	8	8	0
Upper	1	2	+1
Unknown	0	0	0
Total	10	11	+1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

According to the June 30, 2022, FDIC Deposit Market Share Report, Central Bank ranks first among nine FDIC-insured financial institutions operating within the assessment area. The bank held $427.0 million in deposits, representing 28.2 percent of the total deposit market share in the assessment area. In comparison, the second ranked institution, Security Trust & Savings Bank, held $277.3 million in deposits, representing 18.3 percent of the deposit market share.

Central Bank ranks first out of 75 aggregate lenders in 2022 HMDA-reportable transactions. A total of 197 originations and purchase transactions were reported by the bank compared to 69 reported by second place lender United Bank of Iowa. Further, the CRA Market Peer Report ranks Central Bank second out of 36 reporters with 227 CRA-reportable loans in 2022 compared to 404 loans reported by first ranked United Bank of Iowa.

Additional 2022 assessment area demographic information is presented in the following table.

2022 IA Non MSA Buena Vista and Cherokee Counties AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,299	16.8
Moderate	1	9.1	766	9.9	148	19.3	1,387	17.9
Middle	8	72.7	5,693	73.6	371	6.5	1,831	23.7
Upper	2	18.2	1,273	16.5	31	2.4	3,215	41.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**7,732**	**100.0**	**550**	**7.1**	**7,732**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,582	852	9.7	53.9	637	40.3	93	5.9
Middle	10,257	6,283	71.4	61.3	3,019	29.4	955	9.3
Upper	2,187	1,664	18.9	76.1	426	19.5	97	4.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**14,026**	**8,799**	**100.0**	**62.7**	**4,082**	**29.1**	**1,145**	**8.2**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	135	8.8	123	8.9	12	11.0	0	0.0
Middle	1,058	69.2	955	69.1	76	69.7	27	73.0
Upper	336	22.0	305	22.1	21	19.3	10	27.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,529**	**100.0**	**1,383**	**100.0**	**109**	**100.0**	**37**	**100.0**
Percentage of Total Businesses:			**90.5**		**7.1**			**2.4**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	2.5	11	2.5	0	0.0	0	0.0
Middle	344	78.4	341	78.2	3	100.0	0	0.0
Upper	84	19.1	84	19.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**439**	**100.0**	**436**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:			**99.3**		**0.7**			**0.0**

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.

Population Characteristics

According to the U.S. Census Bureau demographic data, the assessment area's population in 2020 at 32,481 represents a slight increase of 0.4 percent compared to 2015. Buena Vista County has seen a population increase of 1.5 percent compared to Cherokee County which saw a population decrease of 1.6 percent during that same period. One of the community representatives indicated that the population migration out of Buena Vista County of young adults is lower than other rural parts of Iowa due to the Buena Vista University partnering with employers in the area help graduates gain employment. The representative also stated that Storm Lake, the largest city in Buena Vista County, is known for being inclusive of people from diverse backgrounds, which has allowed it to continue growing relative to other rural areas.

As shown in the table below, this is congruent with U.S. Census data which shows that Non-MSA parts of the state of Iowa have seen a decrease of 1.4 percent. This is contrasted with the state of Iowa's population growth of 3.1 percent from 2015 to 2020. The other community representative noted that Cherokee County's decrease in population can be partly attributed to the loss of a major employer in that county (Tyson Foods chicken processing plant).   Another community representative also indicated that there has been an inflow of individuals with immigrant status and of low- and moderate-income individuals from other major midwestern cities who had found themselves on long waiting lists for rental housing.

The table below presents the population trends for the assessment area, individual counties, and the state of Iowa, from 2015-2020.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change (%)**
Assessment Area	32,360	32,481	0.4
Buena Vista County, IA	20,507	20,823	1.5
Cherokee County, IA	11,853	11,658	-1.6
Non MSA Iowa	1,250,756	1,232,642	-1.4
Iowa	3,093,526	3,190,369	3.1
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

Income Characteristics

According to the 2020 U.S. Census Bureau, the assessment area is comprised of 7,732 families with a median family income of $74,783, reflecting a 12.5 percent increase from 2015 data. By income category, 16.8 percent are designated as low-income, and 17.9 percent are moderate-income. Of note, there was a decrease in the percentage of families living below the poverty level from 2015 (8.8 percent) to 2020 (7.1 percent). While Buena Vista County experienced higher growth in MFI

($72,230) from 2015 to 2020 at 12.8 percent than Cherokee County, the latter still has a higher MFI at $78,351. This data showing improving economic conditions in the area is congruent with information from community representatives which noted there is very low unemployment in the area and higher paying jobs in the healthcare sector.

The following table compares the median family income for the assessment area, counties within the assessment area, the Iowa-Non MSA and the state of Iowa.

Median Family Income Change			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percent Change (%)
Assessment Area	66,498	74,783	12.5
Buena Vista County, IA	64,029	72,230	12.8
Cherokee County, IA	71,319	78,351	9.9
Non MSA Iowa	67,391	71,763	6.5
Iowa	73,712	79,186	7.4
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

Housing Characteristics

There are a total of 14,026 housing units in the assessment area, which is nearly identical to the number of units in 2015 (14,029). Most of the housing units are owner-occupied at 62.7 percent, 29.1 percent are rental units, and 8.2 percent are vacant. One community representative with expertise in housing trends within the area confirmed that there have been very few single-family homes built recently. This representative noted that housing in Buena Vista County can be difficult to find as supply has not kept up with demand.

The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs. Both counties have lower rates of renters and owners who are housing cost burden than in the state of Iowa overall and non-MSA portions of the state with one exception in Buena Vista County where moderate-income owners have a higher housing cost burden.

The following table presents the recent housing cost burden of renters and homeowners in the assessment area, the two counties that comprise the assessment area, the Iowa Non-MSA and the state of Iowa.

Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	**Low Income**	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Assessment Area	52.1	6.5	22.7	47.7	18.2	11.4
Buena Vista County, IA	56.0	7.8	23.2	49.2	26.3	13.8
Cherokee County, IA	45.8	4.2	21.7	46.0	6.0	8.4
Non MSA Iowa	63.7	13.0	32.5	53.8	19.0	14.5
Iowa	70.6	17.7	37.7	56.8	22.5	15.0
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

Employment Conditions

The assessment area experienced stabilized unemployment rates within the past five years (2017-2021) with the notable increase in 2020 due to the widespread economic downturn caused by the COVID-19 pandemic. One community representative commented that there was still a labor shortage with many businesses having open positions, primarily positions for unskilled workers. The other representative stated that the shortage also extends to skilled workers, such as those in healthcare. Of note, the counties in the assessment area have a lower unemployment rate than both the state of Iowa and the Non-MSA portions of the state between 2017 thru 2021.

The table below shows unemployment statistics for the counties that comprise the assessment area, the assessment area, the Iowa Non-MSA and the state of Iowa.

Unemployment Rates (%)					
Area	**2017**	**2018**	**2019**	**2020**	**2021**
Assessment Area	2.5	2.1	2.1	3.6	3.2
Buena Vista County, IA	2.6	2.1	2.0	3.6	3.2
Cherokee County, IA	2.5	2.1	2.4	3.7	3.4
Non MSA Iowa	3.2	2.6	2.7	4.8	4.1
Iowa	3.1	2.5	2.6	5.1	4.2
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Industry Characteristics

According to the U.S. Bureau of Labor Statistics, in 2022 the assessment area contains a diverse employment base and is most heavily impacted by the industries of manufacturing, retail trade, accommodation, and food services. Both community representatives noted a shortage of available

workforce, with one attributing the cause to a lack of available housing in the area. One representative stated that existing manufacturing employers in the area are reluctant to expand due to workforce issues. Regardless, a large soybean crushing plant is entering the area, leaving an even larger surplus of available manufacturing/production jobs.

Community Representatives

Two community representatives were interviewed to gain a perspective of the economic and socioeconomic conditions, affordable housing options, and relevant credit needs of the area. The representatives spoke to the strength of the local economy, indicated by the low unemployment rates; however, there is still a need for both skilled and unskilled workers in the assessment area. One representative indicated that the lack of adequate childcare options (affordable and overall availability) has kept more people from entering the labor force. Both representatives noted that the area is very diverse relative to other rural areas within the state of Iowa; this is largely driven by large food processing plants in the area. None of the representatives expressed any concerns with the responsiveness of financial institutions to the credit needs of the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS NON-METROPOLITAN BUENA VISTA & CHEROKEE COUNTY, IA

LENDING TEST

The geographic distribution of loans reflects good penetration throughout the assessment area. Distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and businesses and farms of different sizes and a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms. The bank made a relatively high level of community development loans and made limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

For the purposes of this review, loans made in calendar 2021 and prior were analyzed based on the 2011-2015 American Community Survey income designations data[9]. Loans made in calendar years 2022 and after were analyzed based on income designations from the 2016-2020 American Community Survey data.

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly in moderate-income census tracts as the assessment area does not contain any low-income census tracts. Overall, Central Bank's geographic distribution of HMDA-Reportable and CRA-Reportable small

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[9] *The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)*

business and small farm loans reflects good penetration throughout the assessment area. There were no conspicuous lending gaps in the bank's lending distribution across the assessment area, including to moderate-income census tracts.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business and farm lending in relation to census demographics is provided below. Lending distribution tables illustrating 2021 HMDA-reportable lending can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the assessment area. In 2022 the bank originated 13.3 percent of its HMDA-reportable loans in moderate-income census tracts, which was comparable to aggregate at 11.2 percent and above the percentage of owner-occupied units at 9.7 percent. The majority of the bank's HMDA-reportable loans were originated in middle-income census tracts at 75.7 percent. This is comparable to the aggregate and above the percentage of owner-occupied units located in middle-income census tracts at 74.8 percent and 71.4 percent, respectively. Further, the bank originated 11.0 percent of its HMDA-reportable loans in upper-income census tracts, which is comparable to the aggregate at 14.0 percent and below the percentage of owner-occupied units located in upper-income census tracts at 18.9 percent.

Due to low volume, home improvement and multi-family loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, the bank originated 14.9 percent of its home purchase loans in moderate-income census tracts, which is comparable to aggregate at 12.5 percent and above the percentage of owner-occupied units at 9.7 percent. A majority of the bank's home purchase loans were originated in middle-income census tracts at 71.9 percent. This is comparable to the aggregate and percentage of owner-occupied units located in middle-income census tracts at 73.6 percent and 71.4 percent, respectively. Further, the bank originated 13.2 percent of its home purchase loans in upper-income census tracts, which is comparable to the aggregate at 13.8 percent and below the percentage of owner-occupied units located in upper-income census tracts at 18.9 percent.

Refinance Loans

In 2022, Central Bank originated 10.5 percent of its refinance loans in moderate-income census tracts, comparable to aggregate at 7.4 percent and the percentage of owner-occupied units at 9.7 percent. Most of the bank's refinance loans were originated in middle-income census tracts at 84.2 percent. This is above the aggregate and significantly above the percentage of owner-occupied units located in middle-income census tracts at 77.0 percent and 71.4 percent, respectively. Further,

the bank originated 5.3 percent of its refinance loans in upper-income census tracts, which is below the aggregate at 15.6 percent and significantly below the percentage of owner-occupied units located in upper-income census tracts at 18.9 percent.

The following table presents the bank's geographic distribution of HMDA-reportable loans in 2022.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	17	14.9	12.5	2,165	12.4	10.6	9.7
Middle	82	71.9	73.6	13,290	76.1	76.3	71.4
Upper	15	13.2	13.8	2,007	11.5	13.1	18.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	114	100.0	100.0	17,462	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	10.5	7.4	420	8.4	6.3	9.7
Middle	32	84.2	77.0	4,432	89.0	79.9	71.4
Upper	2	5.3	15.6	130	2.6	13.8	18.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	4,982	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	9.7
Middle	16	94.1	95.8	984	98.5	99.0	71.4
Upper	1	5.9	4.2	15	1.5	1.0	18.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	999	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	50.0	21.1	120	35.3	4.3	17.0
Middle	1	25.0	57.9	180	52.9	87.6	76.7
Upper	1	25.0	21.1	40	11.8	8.1	6.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	340	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	23	13.3	11.2	2,705	11.4	9.1	9.7
Middle	131	75.7	74.8	18,886	79.4	78.2	71.4
Upper	19	11.0	14.0	2,192	9.2	12.7	18.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	173	100.0	100.0	23,783	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 Loans

The geographic distribution of small business loans reflects good penetration throughout the assessment area. In 2022, Central Bank originated 6.9 percent of its small business loans in moderate-income census tracts, comparable to the aggregate at 6.5 percent and the percentage of total businesses located in moderate-income census tracts at 8.8 percent. Additionally, the bank originated 75.5 percent of its small business loans in middle-income census tracts, which is comparable to the aggregate and above the percentage of total businesses located in middle-income census tracts at 74.1 percent and 69.2 percent, respectively. Further, the bank originated 17.6 percent of its small business loans in upper-income census tracts, comparable to the aggregate at 17.9 percent and below the percentage of total businesses located in upper-income census tracts at 22.0 percent.

The following table presents the bank's geographic distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Income Level of Geography Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							
Geographic Income Level	**Bank And Aggregate Loans**						**Total Businesses**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	%
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	6.9	6.5	914	6.9	6.1	8.8
Middle	77	75.5	74.1	11,298	85.0	84.6	69.2
Upper	18	17.6	17.9	1,085	8.2	9.0	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	0.3	
Total	102	100.0	100.0	13,297	100.0	100.0	100.0
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.							

Small Farm Loans

In 2022, the geographic distribution of small farm loans reflects good penetration throughout the assessment area. The bank originated 2.4 percent of its small farm loans by number in the moderate-income census tract, which is comparable to the aggregate at 3.1 percent and the percentage of total farms at 2.5 percent in that tract. The bank originated 60.8 percent of its small farm loans by number in middle-income census tracts, which is below the aggregate at 79.0 percent and the percentage of total farms at 78.4 percent in those tracts. The bank originated 36.8 percent of its small farm loans by number in upper-income census tracts, which is significantly above the aggregate at 17.7 percent and the percentage of total farms at 19.1 percent in those tracts.

The following table presents the bank's geographic distribution of small farm lending in 2022.

Distribution of 2022 Small Farm Lending By Income Level of Geography Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	2.4	3.1	655	3.6	4.6	2.5
Middle	76	60.8	79.0	11,365	63.1	74.7	78.4
Upper	46	36.8	17.7	5,999	33.3	20.7	19.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.0	
Total	125	100.0	100.0	18,019	100.0	100.0	100.0
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.							

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

For the purposes of this review, loans made in calendar year 2021 or prior were analyzed based on 2011-2015 American Community Survey income designations for individuals[10]. Loans made in calendar year 2022 or after were analyzed based on 2016-2020 American Community Survey income designations for individuals.

An analysis of loans was conducted to determine the level of lending to borrowers of different income levels and businesses and farms of different sizes. Central Bank's lending activities reflect good penetration among individuals of different income levels, including low- and moderate-income borrowers, and businesses and farms of different sizes.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business and farm lending in relation to borrowers of different income levels and businesses and farms of different sizes is provided below. HMDA-reportable lending distribution tables can be referenced in Appendix B.

HMDA-Reportable Loans

The borrower distribution of HMDA-reportable loans reflects good penetration among individuals of different income levels, including low- and moderate-income borrowers. In 2022, the bank

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[10] *Income levels for individuals are calculated annually by the FFIEC using geographic definitions from the OMB, income data from the ACS and the Consumer Price Index from the Congressional Budget Office (.12(m) Income Levels).*

originated 12.4 percent of its total HMDA-reportable loans to low-income borrowers, which is comparable to the aggregate and below the percentage of low-income families in the assessment area at 12.9 percent and 16.8 percent, respectively. The bank originated 27.2 percent of its HMDA-reportable loans to moderate-income borrowers. This performance is comparable to the aggregate at 29.0 percent and above the percentage of moderate-income families within the assessment area at 17.9 percent. The bank also originated 27.2 percent of its HMDA-reportable loans to middle-income borrowers, above the aggregate at 22.7 percent and the proportion of middle-income families within the assessment area at 23.7 percent. The bank originated 20.7 percent of its HMDA-reportable loans to upper-income borrowers, which is comparable to the aggregate and significantly below the percentage of upper-income families in the assessment area at 22.1 percent and 41.6 percent, respectively. Further, the bank originated 12.4 percent of its HMDA-reportable loans to individuals of unknown-income, comparable to aggregate at 13.3 percent.

Due to low volume, home improvement loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, the bank originated 13.2 percent of its home purchase loans to low-income borrowers, which is comparable to the aggregate and below the percentage of low-income families in the assessment area at 12.9 percent and 16.8 percent, respectively. The bank originated 31.6 percent of its home purchase loans to moderate-income borrowers. This performance is consistent with the aggregate at 31.2 percent and significantly above the percentage of moderate-income families within the assessment area at 17.9 percent. The bank originated 26.3 percent of its home purchase loans to middle-income borrowers, comparable to the aggregate at 23.2 percent and the proportion of middle-income families within the assessment area at 23.7 percent. The bank originated 18.4 percent of its home purchase loans to upper-income borrowers, which is consistent with the aggregate and significantly below the percentage of upper-income families in the assessment area at 18.0 percent and 41.6 percent, respectively. Further, the bank originated 10.5 percent of its home purchase loans to individuals of unknown income, below aggregate at 14.8 percent.

Refinance Loans

In 2022, the bank originated 13.2 percent of its refinance loans to low-income borrowers, which is comparable to the aggregate and the percentage of low-income families in the assessment area at 15.6 percent and 16.8 percent, respectively. The bank originated 15.8 percent of its refinance loans to moderate-income borrowers. This performance is below the aggregate at 26.2 percent but comparable to the percentage of moderate-income families within the assessment area at 17.9 percent. The bank originated 34.2 percent of its refinance loans to middle-income borrowers, above the aggregate at 22.1 percent and the proportion of middle-income families within the assessment area at 23.7 percent. The bank originated 18.4 percent of its refinance loans to upper-income borrowers, which is below the aggregate and significantly below the percentage of upper-income

families in the assessment area at 23.0 percent and 41.6 percent, respectively. Further, the bank originated 18.4 percent of its refinance loans to individuals of unknown income, above the aggregate at 13.1 percent.

The following table presents the bank's borrower distribution of HMDA-reportable loans in 2022.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: IA Non MSA Buena Vista and Cherokee Counties						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	15	13.2	12.9	1,501	8.6	7.7	16.8
Moderate	36	31.6	31.2	4,589	26.3	25.7	17.9
Middle	30	26.3	23.2	5,359	30.7	25.3	23.7
Upper	21	18.4	18.0	4,436	25.4	26.9	41.6
Unknown	12	10.5	14.8	1,577	9.0	14.4	0.0
Total	114	100.0	100.0	17,462	100.0	100.0	100.0
Refinance Loans							
Low	5	13.2	15.6	352	7.1	10.7	16.8
Moderate	6	15.8	26.2	682	13.7	22.3	17.9
Middle	13	34.2	22.1	1,412	28.3	21.0	23.7
Upper	7	18.4	23.0	1,181	23.7	28.7	41.6
Unknown	7	18.4	13.1	1,355	27.2	17.3	0.0
Total	38	100.0	100.0	4,982	100.0	100.0	100.0
Home Improvement Loans							
Low	1	5.9	4.2	8	0.8	0.6	16.8
Moderate	4	23.5	25.0	117	11.7	12.5	17.9
Middle	3	17.6	16.7	100	10.0	10.4	23.7
Upper	7	41.2	45.8	552	55.3	61.2	41.6
Unknown	2	11.8	8.3	222	22.2	15.3	0.0
Total	17	100.0	100.0	999	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	21	12.4	12.9	1,861	7.9	8.3	16.8
Moderate	46	27.2	29.0	5,388	23.0	24.3	17.9
Middle	46	27.2	22.7	6,871	29.3	23.5	23.7
Upper	35	20.7	22.1	6,169	26.3	29.3	41.6
Unknown	21	12.4	13.3	3,154	13.5	14.6	0.0
Total	169	100.0	100.0	23,443	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 Loans

The distribution of small business loans reflects good penetration among businesses of different revenue sizes. In 2022, Central Bank originated 70.6 percent of its business loans to businesses reporting annual revenues of $1 million or less, which was significantly above the aggregate at 50.9 percent and significantly below the percentage of businesses with gross revenues of $1 million or less at 90.5 percent. Of loans to businesses with revenues of $1 million or less, 73.6 percent were in amounts of $100,000 or less. Loans in amounts of $100,000 or less are generally considered most beneficial for small businesses, demonstrating the bank's ability to meet the credit needs of small businesses.

The following table presents the bank's borrower distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							Total Businesses
	Bank And Aggregate Loans						
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	72	70.6	50.9	8,107	61.0	53.9	90.5
Over $1 Million	22	21.6		4,287	32.2		7.1
Revenue Unknown	8	7.8		903	6.8		2.4
Total	102	100.0		13,297	100.0		100.0
By Loan Size							
$100,000 or Less	65	63.7	88.4	3,120	23.5	37.7	
$100,001 - $250,000	24	23.5	7.3	3,838	28.9	21.7	
$250,001 - $1 Million	13	12.7	4.3	6,339	47.7	40.5	
Total	102	100.0	100.0	13,297	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	53	73.6		2,438	30.1		
$100,001 - $250,000	12	16.7		2,040	25.2		
$250,001 - $1 Million	7	9.7		3,629	44.8		
Total	72	100.0		8,107	100.0		
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.							

Small Farm Loans

In 2022, the distribution of small farm loans reflects good penetration among farms of different

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sizes. The bank originated 81.6 percent of its farm loans to farms with total revenues of $1 million or less. This was significantly above the aggregate performance of 53.4 percent but significantly below the percentage of total farms in the assessment area at 99.3 percent. Of loans to farms with revenues of $1 million or less, a majority (52.9 percent) were in amounts of $100,000 or less, which are generally considered most beneficial for small farms.

The following table presents the bank's borrower distribution of small farm loans in 2022.

Distribution of 2022 Small Farm Lending By Revenue Size of Farms Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	102	81.6	53.4	14,442	80.1	63.8	99.3
Over $1 Million	12	9.6		2,556	14.2		0.7
Revenue Unknown	11	8.8		1,021	5.7		0.0
Total	125	100.0		18,019	100.0		100.0
By Loan Size							
$100,000 or Less	64	51.2	71.1	3,544	19.7	24.4	
$100,001 - $250,000	38	30.4	18.9	6,415	35.6	36.2	
$250,001 - $500,000	23	18.4	10.0	8,060	44.7	39.4	
Total	125	100.0	100.0	18,019	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	54	52.9		3,072	21.3		
$100,001 - $250,000	31	30.4		5,127	35.5		
$250,001 - $500,000	17	16.7		6,243	43.2		
Total	102	100.0		14,442	100.0		
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.*							

Community Development Lending

Central Bank made a relatively high level of community development loans and made limited use of innovative or flexible lending practices in serving assessment area credit needs. During the evaluation period, the bank originated three loans totaling approximately $18.0 million in the assessment area. Additionally, the bank originated 35 Paycheck Protection Program (PPP) loans totaling approximately $1.8 million within the assessment area during the evaluation period that qualified for community development credit. When compared to the previous evaluation, the bank decreased the number of loans (non-PPP) but increased its dollar volume by 328.5 percent. The

majority of the bank's dollars went to affordable housing projects, with the remainer used to revitalize and stabilize low- and moderate-income geographies via PPP loans.

The following table presents the bank's qualified community development loans during the review period.

Qualified Community Development Loans by Purpose November 17, 2020 - January 22, 2024										
Assessment Area	**Affordable Housing**		**Community Service**		**Economic Development**		**Revitalize/ Stabilize**		**Total**	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$
Buena Vista and Cherokee Counties, IA Non-MSA	3	17,954	0	0	0	0	0	0	3	17,954
PPP	0	0	0	0	0	0	35	1,788	35	1,788

INVESTMENT TEST

The bank's record of performance in the assessment area demonstrates an adequate level of qualified community development investments and donations, particularly those not routinely provided by private investors, rarely in a leadership position. The bank made rare use of innovative or complex investments to support community development initiatives; however, the bank exhibited adequate responsiveness to credit and community development needs by maintaining two bond investments in a medical center that serve populations in need of health care.

During the evaluation period, Central Bank made no new qualified investments but maintained three prior period investments totaling $2.1 million. This is a slight decrease from the previous evaluation, where the bank made eight community development investments totaling approximately $2.6 million within the assessment area.

The following table presents the bank's qualified community development investments during the review period.

Community Development Investments by Purpose (Dollars in 000s) November 17, 2020 - January 22, 2024							
Assessment Area	Current Period				Current Period Total ($)	Prior Period ($)	Total ($)
	Affordable Housing ($)	Community Service ($)	Activities that Revitalize/Stabilize ($)	Economic Development ($)			
Buena Vista and Cherokee Counties, IA Non-MSA	0	0	0	0	0	2,062	2,062

Additionally, Central Bank distributed a total of $55,013 in 50 qualified grants and donations in the current evaluation period. The grants and donations were made to organizations who serve community service purposes. When compared to the previous evaluation, the bank decreased the dollar of donations by 30.3 percent. However, this review period was 11 months shorter than the previous evaluation's, which means the decrease on a dollars per month basis would be 10.2 percent.

The following table presents the bank's qualified community development grants and donations during the review period.

Qualified Community Development Donations by Purpose November 17, 2020 - January 22, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalize/ Stabilize		Total	
	#	$	#	$	#	$	#	$	#	$
Buena Vista and Cherokee Counties, IA Non-MSA	0	0	50	55,013	0	0	0	0	50	55,013

SERVICE TEST

The bank's delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to moderate-income geographies or low- and moderate-income individuals. Services do not vary in a way that inconveniences the needs of its assessment area, particularly moderate-income geographies and/or low- and moderate-income individuals. Finally, the bank is a leader in providing community development services.

Retail Services

The distribution of the branch offices and ATMs is performed using current data (2022) and any changes in the median family income level of the geographies where the branches are located.

The assessment area contains three branches, each with cash-only ATMs. The bank closed two branches, one with a cash-only ATM, and one limited-service branch with a cash-only ATM since the previous evaluation. No new branches have opened since the prior evaluation. Two of the branches are in middle-income census tracts and one branch is in an upper-income census tract. The offices in the assessment area represent 15.0 percent of the institution's total offices and ATMs, based upon the combined assessment area.

Bank locations are open Monday through Friday with standard hours from 8:00 a.m. to 4:00 p.m., and drive-up available until 5:00 p.m. Additionally, all branches offer drive-up availability from 8:30 a.m. to 12:00 p.m. on Saturdays. The bank's ATMs and online and mobile banking services expand the availability of services beyond the branches' regular operating hours. All products and services are consistent among all branches.

Community Development Services

Bank employees provided 1,220 hours within this assessment area, which is 18.9 percent of the total 6,472 total hours qualified community development services. This represents a decrease of 53.3 percent compared to the previous evaluation. However, in addition to the shorter evaluation of this review period, the bank had two fewer bank branches (and one limited-service branch) located in the assessment area for this evaluation as the two full-service branches closed in June of 2021. The services were performed for several organizations, all of which are focused on providing community services to low- or moderate-income individuals or families.

The following table presents the bank's qualified community development services during the review period.

Community Development Services November 17, 2020 - January 22, 2024					
Assessment Area	**Affordable Housing**	**Community Service**	**Economic Development**	**Revitalize /Stabilize**	**Total Hours**
	# Hours	**# Hours**	**# Hours**	**# Hours**	
Buena Vista and Cherokee Counties, IA Non-MSA	0	1,220	0	0	1,220

NON-METROPOLITAN DICKINSON COUNTY, IA – Limited Review

SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the Performance Evaluation.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN DICKINSON COUNTY, IA [11]

Central Bank's Dickinson County, IA Non-MSA assessment area consists of the entirety of Dickinson County and remains unchanged since the previous evaluation. Located within the assessment area is one branch location with one cash-only ATM, both located in a moderate-income census tract; and one LPO in an upper-income census tract. In 2022, the assessment area was comprised of six census tracts: one moderate-, three middle-, and two upper-income census tracts. There are no low-, unknown-, or distressed or underserved middle-income census tracts in the assessment area.

Tract Designation Change Data

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

The following shows the changes in census tract designations by income since the previous evaluation.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	0	0
Moderate	0	1	+1
Middle	2	3	+1
Upper	3	2	-1

[11] *Census tract designations are based on American Community Survey income data. For years 2022 and after, the designations are based on 2016-2020 ACS data. For years 2021 and before, the designations are based on 2011-2015 ACS data. For examinations that include performance before and after 2022, both sets of data have been used to perform the analysis of bank activity in the respective timeframes.*

Unknown	0	0	0
Total	5	6	+1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

According to the June 30, 2022, FDIC Deposit Market Share Report, Central Bank ranks fourth of eight FDIC-insured financial institutions operating within the assessment area. The bank held $138.7 million in deposits, representing 13.0 percent of the total deposit market share. In comparison, the three largest financial institutions operating within the assessment area by deposit market share are Northwest Bank (28.3 percent), Bank Midwest (19.5 percent), and United Community Bank (15.0 percent).

Central Bank ranks second out of 114 aggregate lenders in 2022 HMDA-reportable transactions. A total of 105 originations and purchase transactions were reported by the bank compared to 229 reported by market leader Northwest Bank. Further, the CRA Market Peer Report ranks Central Bank sixth out of 34 reporters with 44 CRA-reportable loans in 2022 compared to 112 loans reported by first-ranked Northwest Bank.

Additional 2022 assessment area demographic information is presented in the following table.

2022 IA Non MSA Dickinson County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	776	15.5
Moderate	1	16.7	628	12.6	0	0.0	1,016	20.3
Middle	3	50.0	2,592	51.8	174	6.7	999	20.0
Upper	2	33.3	1,782	35.6	57	3.2	2,211	44.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	5,002	100.0	231	4.6	5,002	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,484	768	11.6	51.8	471	31.7	245	16.5
Middle	6,067	3,416	51.7	56.3	773	12.7	1,878	31.0
Upper	6,497	2,418	36.6	37.2	633	9.7	3,446	53.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	14,048	6,602	100.0	47.0	1,877	13.4	5,569	39.6

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	270	22.1	243	21.9	24	26.7	3	13.0
Middle	474	38.8	434	39.1	30	33.3	10	43.5
Upper	479	39.2	433	39.0	36	40.0	10	43.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,223	100.0	1,110	100.0	90	100.0	23	100.0
Percentage of Total Businesses:			90.8		7.4		1.9	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3	2.5	3	2.5	0	0.0	0	0.0
Middle	67	55.4	66	55.9	1	50.0	0	0.0
Upper	51	42.1	49	41.5	1	50.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	121	100.0	118	100.0	2	100.0	1	100.0
Percentage of Total Farms:			97.5		1.7		0.8	

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.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Dickinson County, IA Non-MSA	Consistent	Consistent	Consistent

The institution's lending, investment, and service performance in the assessment area is consistent with the institution's overall performance in the state of Iowa.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: IA Non MSA Dickinson County						
Geographic Income Level	**Bank And Aggregate Loans**					**Owner Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans						
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	10.8	15.3	1,368	5.6	9.9	11.6
Middle	45	69.2	53.1	13,802	56.4	51.2	51.7
Upper	13	20.0	31.7	9,282	38.0	38.9	36.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	65	100.0	100.0	24,452	100.0	100.0	100.0
Refinance Loans						
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.6	0	0.0	4.5	11.6
Middle	10	58.8	53.4	2,102	31.9	42.0	51.7
Upper	7	41.2	37.0	4,479	68.1	53.5	36.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	6,581	100.0	100.0	100.0
Home Improvement Loans						
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	15.1	15	4.6	17.6	11.6
Middle	3	60.0	54.7	280	86.2	48.0	51.7
Upper	1	20.0	30.2	30	9.2	34.4	36.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	325	100.0	100.0	100.0
Multifamily Loans						**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	3.5	4.9
Middle	0	0.0	25.0	0	0.0	9.1	26.0
Upper	0	0.0	50.0	0	0.0	87.4	69.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans						**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	9.2	12.7	1,383	4.4	8.0	11.6
Middle	58	66.7	54.4	16,184	51.6	46.7	51.7
Upper	21	24.1	32.9	13,791	44.0	45.3	36.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	87	100.0	100.0	31,358	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.

Distribution of 2022 Small Business Lending By Income Level of Geography Assessment Area: IA Non MSA Dickinson County						
Geographic Income Level	**Bank And Aggregate Loans**					**Total Businesses**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	%
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	25.0	18.8	2,450	34.7	20.2	22.1
Middle	17	47.2	39.2	2,014	28.5	37.3	38.8
Upper	10	27.8	39.2	2,606	36.9	42.1	39.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.9	0	0.0	0.4	
Total	36	100.0	100.0	7,070	100.0	100.0	100.0

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.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: IA Non MSA Dickinson County						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	5.6	0	0.0	2.9	15.5
Moderate	15	23.1	11.3	2,228	9.1	5.7	20.3
Middle	9	13.8	14.3	2,316	9.5	9.6	20.0
Upper	31	47.7	47.4	16,726	68.4	61.4	44.2
Unknown	10	15.4	21.4	3,182	13.0	20.4	0.0
Total	65	100.0	100.0	24,452	100.0	100.0	100.0
Refinance Loans							
Low	1	5.9	7.2	90	1.4	2.2	15.5
Moderate	3	17.6	16.3	455	6.9	8.7	20.3
Middle	2	11.8	16.3	513	7.8	8.6	20.0
Upper	11	64.7	46.6	5,523	83.9	64.5	44.2
Unknown	0	0.0	13.5	0	0.0	16.1	0.0
Total	17	100.0	100.0	6,581	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.9	0	0.0	0.2	15.5
Moderate	0	0.0	13.2	0	0.0	4.8	20.3
Middle	0	0.0	15.1	0	0.0	7.6	20.0
Upper	5	100.0	67.9	325	100.0	86.4	44.2
Unknown	0	0.0	1.9	0	0.0	0.9	0.0
Total	5	100.0	100.0	325	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	1.1	5.7	90	0.3	2.6	15.5
Moderate	18	20.7	12.4	2,683	8.6	6.1	20.3
Middle	11	12.6	14.7	2,829	9.0	8.7	20.0
Upper	47	54.0	50.9	22,574	72.0	63.8	44.2
Unknown	10	11.5	16.4	3,182	10.1	18.8	0.0
Total	87	100.0	100.0	31,358	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.

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: IA Non MSA Dickinson County						
	Bank And Aggregate Loans					Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	18	50.0	59.2	3,814	53.9	55.5	90.8
Over $1 Million	14	38.9		1,903	26.9		7.4
Revenue Unknown	4	11.1		1,353	19.1		1.9
Total	36	100.0		7,070	100.0		100.0
By Loan Size							
$100,000 or Less	18	50.0	86.6	932	13.2	26.5	
$100,001 - $250,000	12	33.3	9.1	2,460	34.8	28.9	
$250,001 - $1 Million	6	16.7	4.3	3,678	52.0	44.6	
Total	36	100.0	100.0	7,070	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	9	50.0		468	12.3		
$100,001 - $250,000	5	27.8		970	25.4		
$250,001 - $1 Million	4	22.2		2,376	62.3		
Total	18	100.0		3,814	100.0		

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.

Community Development Activities November 17, 2020 - January 22, 2024										
Dickinson County, IA Non-MSA Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total #	Total $(000s)
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)		
Loans	0	0	0	0	0	0	0	0	0	0
Investments	0	0	0	0	1	295	0	0	1	295
Donations	0	0	4	2,333	0	0	0	0	4	2,333
	Affordable Housing Hours		Community Services Hours		Economic Development Hours		Revitalize/ Stabilize Hours		Total Hours	
Services	0		202		0		0		202	

SOUTH DAKOTA

CRA RATING FOR SOUTH DAKOTA[12]: Satisfactory
The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

Lending Test:
- The geographic distribution of loans reflects good penetration throughout the assessment area;
- The distribution of borrowers reflects, given the product lines offered, adequate penetration among customers of different income levels and business of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- The bank made an adequate level of community development loans; and
- Limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:
- An adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position;
- The bank made rare use of innovative and/or complex investments to support community development initiatives; and
- The bank exhibits adequate responsiveness to credit and community development needs.

Service Test:
- The bank service delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas;
- To the extent changes have been made, its record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals;
- The bank's services and business hours do not vary in a way that inconveniences the needs of its assessment area, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals; and
- The bank provides a relatively high level of community development services.

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[12] *For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.*

SCOPE OF EXAMINATION

Full-scope examination procedures were used to evaluate the bank's performance in the Sioux Falls SD, MSA #43620 assessment area. A limited scope review was conducted on the assessment area of Non-MSA Brookings County, SD. The performance criteria and review periods are consistent with the scope described in the overall scope of the Performance Evaluation. Only one assessment area was reviewed under full-scope examination procedures; therefore, the state lending, investment, and services conclusions for that assessment area are described in the assessment area analysis below.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA

Central Bank's operations in the state of South Dakota consist of two assessment areas: the Sioux Falls, SD MSA, which is a partial MSA that consists of Lincoln and Minnehaha Counties in their entireties, and Brookings County, SD Non-MSA which consists of the entirety of the county. The assessment area includes three branches with cash-only ATMs, which the bank acquired in February of 2020. The three branches are in low-, moderate-, and upper-income census tracts, respectively. This will be the first evaluation where the assessment area has been reviewed for performance under the CRA. In 2022 the assessment area consists of two low-income, 15 moderate-income, 30 middle-income, 12 upper-income, and one unknown-income census tract. The unknown-income census tract consists of a large commercial area that includes Empire Mall, hotels, and the Sioux Falls School District offices.

Tract Designation Change Data

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's ACS and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

The following shows the changes in census tract designations by income since the previous evaluation.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	2	+2
Moderate	8	15	+7
Middle	35	30	-5
Upper	25	12	-13
Unknown	0	1	+1
Total	68	60	-8
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

According to the June 30, 2022, FDIC Deposit Market Share Report, Central Bank ranks 16th of 35 FDIC-insured financial institutions operating within the assessment area. The bank held $161.4 million in deposits, representing less than 0.1 percent of the total deposit market share. In comparison, the two largest financial institutions operating within the assessment area by deposit market share are Citibank, NA (64.4 percent) and Wells Fargo Bank, NA (33.2 percent), which combined dominate the market for deposits in the area.

Central Bank ranks 16th out of 216 aggregate lenders in 2022 HMDA-reportable transactions. A total of 209 originations and purchase transactions were reported by the bank compared to 1,533 reported by market leader Plains Commerce Bank. Further, the CRA Market Peer Report ranks Central Bank 14th out of 92 reporters with 118 CRA-reportable loans in 2022 compared to 992 loans reported by first-ranked JP Morgan Chase Bank, NA.

Additional 2022 assessment area demographic information is presented in the following table.

2022 Sioux Falls, SD MSA 43620 AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**
	#	%	#	%	#	%	#	%
Low	2	3.3	922	1.5	89	9.7	11,598	18.5
Moderate	15	25.0	12,276	19.6	1,562	12.7	11,250	17.9
Middle	30	50.0	34,199	54.5	1,388	4.1	15,455	24.6
Upper	12	20.0	15,126	24.1	210	1.4	24,450	39.0
Unknown	1	1.7	230	0.4	51	22.2	0	0.0
Total AA	**60**	**100.0**	**62,753**	**100.0**	**3,300**	**5.3**	**62,753**	**100.0**

	Housing Units by Tract	Housing Type by Tract					
		Owner-occupied			**Rental**		**Vacant**
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,153	719	1.1	22.8	2,165	68.7	269	8.5
Moderate	26,582	11,779	18.2	44.3	12,170	45.8	2,633	9.9
Middle	54,236	36,248	56.1	66.8	15,442	28.5	2,546	4.7
Upper	19,525	15,916	24.6	81.5	3,251	16.7	358	1.8
Unknown	1,104	0	0.0	0.0	1,104	100.0	0	0.0
Total AA	**104,600**	**64,662**	**100.0**	**61.8**	**34,132**	**32.6**	**5,806**	**5.6**

	Total Businesses by Tract	Businesses by Tract & Revenue Size					
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	903	7.8	778	7.5	117	11.2	8	5.9
Moderate	2,848	24.6	2,411	23.2	417	39.8	20	14.7
Middle	5,125	44.3	4,695	45.2	346	33.0	84	61.8
Upper	2,329	20.1	2,183	21.0	122	11.7	24	17.6
Unknown	365	3.2	320	3.1	45	4.3	0	0.0
Total AA	**11,570**	**100.0**	**10,387**	**100.0**	**1,047**	**100.0**	**136**	**100.0**
Percentage of Total Businesses:			**89.8**		**9.0**		**1.2**

	Total Farms by Tract	Farms by Tract & Revenue Size					
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	20	3.4	19	3.3	1	10.0	0	0.0
Middle	489	82.5	479	82.3	9	90.0	1	100.0
Upper	82	13.8	82	14.1	0	0.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	**593**	**100.0**	**582**	**100.0**	**10**	**100.0**	**1**	**100.0**
Percentage of Total Farms:			**98.1**		**1.7**		**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.

Population Characteristics

According to the 2020 U.S. Census Bureau demographic data, the assessment area's population is 262,375. The assessment area experienced a significant increase in population of 14.7 percent between 2015 and 2020, which outpaced the state of South Dakota's population growth of 5.2 percent during the same period. Lincoln County observed population growth at nearly triple the rate (30.7 percent) of Minnehaha County (10.2 percent). Minnehaha County has a much higher population relative to Lincoln County with just under 200,000 people compared to the latter's population in 2020 of a little over 65,000. The community representative noted that Minnehaha County is more landlocked and therefore more of the population's growth is occurring in Lincoln County. The representative noted that the Sioux Falls, SD MSA is the largest MSA in the state of South Dakota and a primary driver of the state's overall population increase.

The following table presents the population trends for the assessment area, two counties within the assessment area, the entirety of Sioux Falls, SD MSA, and the state of South Dakota from 2015 to 2020.

Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change (%)**
Assessment Area	228,816	262,375	14.7
Lincoln County, SD	49,874	65,161	30.7
Minnehaha County, SD	178,942	197,214	10.2
Sioux Falls, SD MSA	242,731	276,730	14.0
South Dakota	843,190	886,667	5.2
Source: 2011-2015 – U.S. Census Bureau: American Community Survey			
2020 U.S. Census Bureau Decennial Census			

Income Characteristics

According to the 2020 U.S. Census Bureau, the assessment area is comprised of 62,753 families, of which 18.5 percent are designated as low-income, 17.9 percent are moderate-income, 24.6 percent are middle-income, and 39.0 percent are upper-income. Families living below the poverty level within the assessment area is at 5.3 percent, which is below the state of South Dakota's poverty rate of 8.0 percent. According to the 2016-2020 ACS, the median family income for the assessment area is $84,477, which is above the MFI for the state of South Dakota at $77,042. Minnehaha County experienced a higher growth in MFI at 8.6 percent when compared to Lincoln County and the state of South Dakota at 4.3 and 8.1 percent, respectively. A community representative stated the primary factor for the disparity in MFI growth rates between the two counties is that Lincoln County is more rural with fewer employers creating a competitive job market. Most of the higher paying jobs are in Minnehaha County. The community representative noted that a favorable tax environment has helped attract employees to the state of South Dakota as well as a fast-growing

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airport which makes the area more attractive to employers.

The following table compares the median family income for the assessment area, counties within the assessment area, the Sioux Falls, SD MSA, and the state of South Dakota.

Median Family Income Change			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change (%)**
Assessment Area	79,779	84,477	5.9
Lincoln County, SD	93,268	97,279	4.3
Minnehaha County, SD	75,726	82,208	8.6
Sioux Falls, SD MSA	79,701	84,874	6.5
South Dakota	71,276	77,042	8.1
Source: 2011 - 2015 and 2016 – 2020 U.S. Census Bureau American Community Survey			
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

The bank's assessment area includes 104,600 housing units. The majority of housing units are owner-occupied at 61.8 percent, whereas rental units account for 32.6 percent of total units. Within the assessment area, 5.6 percent of housing units are vacant, which is significantly lower than the percentage of vacant units within the state of South Dakota at 12.3 percent of total housing units.

The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs. As depicted within the following table, low-income and moderate-income renters and owners are more housing cost burden in the assessment area than those in the state of South Dakota. The lone exception is moderate-income renters in Minnehaha County, which have the same percentage of those burdened by housing costs as the state of South Dakota.

A community representative expressed that there is significant demand for single family homes, especially those at the entry level price point. The community representative noted that the state of South Dakota has committed a large grant to the area to encourage more housing development. Further, the community representative stated that affordable housing is becoming a major need for the local area to continue to attract employees for the growing business sector.

The following table represents recent housing cost burden of renters and homeowners in the assessment area, the two counties that comprise the assessment area, the Sioux Falls, SD MSA, and the state of South Dakota.

Housing Cost Burden						
	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	74.9	22.4	37.5	56.8	29.0	13.8
Lincoln County, SD	70.5	47.2	34.2	60.9	32.8	14.3
Minnehaha County, SD	75.3	18.4	38.1	55.8	27.9	13.6
Sioux Falls, SD MSA	73.7	21.9	37.1	56.1	27.8	13.8
South Dakota	64.8	18.4	34.6	54.0	24.1	15.4
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

Employment Conditions

In 2021, the unemployment rate within the assessment area (2.8 percent) was comparable to the state of South Dakota's unemployment rate at 3.1 percent. COVID-19 pandemic-related unemployment rates have declined but remain above pre-pandemic levels. Historically, the assessment area has experienced lower unemployment rates when compared to the state of South Dakota. A community representative stated that the area has ample job opportunities at most skill levels and employers have had to rely on both immigrant and nonimmigrant work visas to meet labor needs.

The following table displays unemployment statistics for the assessment area, the counties comprising the assessment area, the entire Sioux Falls, SD MSA, and the state of South Dakota.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	2.5	2.4	2.4	4.0	2.8
Lincoln County, SD	2.3	2.1	2.2	3.4	2.4
Minnehaha County, SD	2.6	2.4	2.5	4.3	2.9
Sioux Falls, SD MSA	2.6	2.4	2.4	4.0	2.8
State of South Dakota	3.1	2.8	2.8	4.3	3.1
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Industry Characteristics

According to the U.S. Bureau of Labor Statistics, in 2022 the assessment area contains a diverse employment base and is most heavily impacted by the industries of manufacturing, healthcare, and retail trade. A community representative stated that the favorable corporate tax environment has allowed Sioux Falls to be selective in what types of businesses are allowed establishments. The representative noted that there has been a record number of commercial building permits in 2022 and 2023. Further, the community representative stated that given the ever-expanding industry in

the area, the establishment of more financial institutions has closely followed.

Community Representative

One community representative was contacted during the evaluation to provide information regarding local economic and demographic conditions. The representative provided information on housing, employment, and economic development needs within the assessment area, as well as providing information about how the COVID-19 pandemic affected the economy in the area. The representative stated that the area was not as heavily impacted by the pandemic as the state of South Dakota minimized business and schools' closures. Additionally, the community representative stated the economic environment, for both employees and employers, continues to improve leading to the need for more housing and childcare services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

Central Bank's performance relative to the lending test is rated low satisfactory. Loans reflect good geographic distribution throughout the assessment area, and the distribution of borrowers reflects, given the product lines offered, adequate penetration among individuals of different income levels and businesses of different sizes. The bank has a good record of serving the credit needs of low-income individuals and areas and very small businesses. The bank made an adequate level of community development loans and made limited use of innovative or flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

For the purposes of this review, loans made in calendar 2021 and prior were analyzed based on the 2011-2015 American Community Survey income designations data[13]. Loans made in calendar years 2022 and after were analyzed based on income designations from the 2016-2020 American Community Survey data.

An analysis of the geographic distribution of loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly in low- and moderate-income census tracts. Overall, Central Bank's geographic distribution of HMDA-Reportable and CRA-Reportable small business loans reflects good penetration throughout the assessment area. There were no conspicuous lending gaps in the bank's lending distribution across the assessment area, including to low- and moderate-income census tracts.

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[13] *The median family income levels (MFI) for census tracts are calculated using income data from the U.S. Census Bureau's American Community Survey and geographic designations from the Office of Management and Budget and are updated approximately every five years. (.12(m) Income Levels)*

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business lending in relation to census demographics is provided below. The bank's HMDA-reportable lending was given slightly more weight in the analysis due to its higher volume than CRA-reportable lending. The lending distribution of 2021 HMDA-reportable lending can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the assessment area. In 2022, Central Bank originated 0.6 percent of its HMDA-reportable loans in low-income census tracts, which is comparable to the aggregate and the percentage of owner-occupied units located in low-income census tracts at 1.0 percent and 1.1 percent, respectively. The bank originated 15.4 percent of its HMDA-reportable loans in moderate-income census tracts, which is again comparable to the aggregate at 16.4 percent and the percentage of owner-occupied units at 18.2 percent. The bank originated 59.9 percent of its HMDA-reportable loans in middle-income census tracts. This is comparable to the aggregate and the percentage of owner-occupied units located in middle-income census tracts at 58.2 percent and 56.1 percent, respectively. Further, the bank originated 24.1 percent of its HMDA-reportable loans in upper-income census tracts, which is also comparable to the aggregate at 24.4 percent and the percentage of owner-occupied units located in upper-income census tracts at 24.6 percent.

Due to low volume, home improvement and multi-family loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, Central Bank originated none of its home purchase loans in low-income census tracts, which is comparable to the aggregate and the percentage of owner-occupied units located in low-income census tracts at 1.0 percent and 1.1 percent, respectively. The bank originated 17.7 percent of its home purchase loans in moderate-income census tracts, which is also comparable to the aggregate at 17.3 percent and the percentage of owner-occupied units at 18.2 percent. The bank originated 58.4 percent of its home purchase loans in middle-income census. This is comparable to the aggregate and the percentage of owner-occupied units located in middle-income census tracts at 57.9 percent and 56.1 percent, respectively. Further, the bank originated 23.9 percent of its home purchase loans in upper-income census tracts, which is also comparable to the aggregate at 23.8 percent and the percentage of owner-occupied units located in upper-income census tracts at 24.6 percent.

Refinance Loans

In 2022, Central Bank originated 2.9 percent of its refinance loans in low-income census tracts, which is comparable to the aggregate and the percentage of owner-occupied units located in low-income census tracts at 1.1 percent and 1.1 percent, respectively. The bank originated 5.7 percent of

its refinance loans in moderate-income census tracts, below the aggregate at 15.8 percent and significantly below the percentage of owner-occupied units at 18.2 percent. The bank originated 60.0 percent of its refinance loans in middle-income census tracts. This is comparable to the aggregate 59.8 percent but below the percentage of owner-occupied units located in middle-income census tracts at 56.1 percent. Further, the bank originated 31.4 percent of its refinance loans in upper-income census tracts, which is above the aggregate at 23.3 percent and the percentage of owner-occupied units located in upper-income census tracts at 24.6 percent.

The following table presents the bank's geographic distribution of HMDA-reportable loans in 2022.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Sioux Falls, SD MSA 43620						
Geographic Income Level	**Bank And Aggregate Loans**					**Owner Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	1.0	0	0.0	0.7	1.1
Moderate	20	17.7	17.3	3,668	10.0	11.8	18.2
Middle	66	58.4	57.9	19,145	52.3	56.8	56.1
Upper	27	23.9	23.8	13,800	37.7	30.7	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	113	100.0	100.0	36,613	100.0	100.0	100.0
Refinance Loans							
Low	1	2.9	1.1	182	1.8	0.8	1.1
Moderate	2	5.7	15.8	217	2.1	10.2	18.2
Middle	21	60.0	59.8	6,314	61.8	58.4	56.1
Upper	11	31.4	23.3	3,506	34.3	30.7	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	10,219	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.2	0	0.0	0.1	1.1
Moderate	3	30.0	12.6	94	17.7	9.7	18.2
Middle	7	70.0	57.5	437	82.3	53.4	56.1
Upper	0	0.0	29.7	0	0.0	36.8	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	531	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	5.7	0	0.0	7.2	7.7
Moderate	0	0.0	34.0	0	0.0	31.8	36.1
Middle	3	75.0	47.2	37,780	80.8	40.3	42.3
Upper	1	25.0	11.9	9,000	19.2	20.0	9.4
Unknown	0	0.0	1.3	0	0.0	0.7	4.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	46,780	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	1	0.6	1.0	182	0.2	1.8	1.1
Moderate	25	15.4	16.4	3,979	4.2	14.9	18.2
Middle	97	59.9	58.2	63,676	67.6	54.0	56.1
Upper	39	24.1	24.4	26,306	27.9	29.1	24.6
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	162	100.0	100.0	94,143	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.

<u>Small Business Loans</u>

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. In 2022, Central Bank originated 2.6 percent of its small business loans in low-income census tracts, comparable to the aggregate at 4.9 percent and below the percentage of total businesses located in low-income census tracts at 7.8 percent. The bank originated 51.3 percent of its small business loans in moderate-income census tracts, significantly above the aggregate at 23.6 percent and the percentage of total businesses located in moderate-income census tracts at 24.6 percent. Additionally, the bank originated 13.0 percent of its small business loans in middle-income census tracts, significantly below the aggregate and the percentage of total businesses located in middle-income census tracts at 46.0 percent and 44.3 percent, respectively. Further, the bank originated 33.0 percent of its small business loans in upper-income census tracts, above the aggregate at 22.8 percent and significantly above the percentage of total businesses located in upper-income census tracts at 20.1 percent.

The following table presents the bank's geographic distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Income Level of Geography Assessment Area: Sioux Falls, SD MSA 43620							
Geographic Income Level	**Bank And Aggregate Loans**						**Total Businesses**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	%
Low	3	2.6	4.9	400	1.5	5.8	7.8
Moderate	59	51.3	23.6	13,190	48.0	29.3	24.6
Middle	15	13.0	46.0	3,535	12.9	43.2	44.3
Upper	38	33.0	22.8	10,343	37.7	19.4	20.1
Unknown	0	0.0	2.2	0	0.0	2.3	3.2
Tract-Unk	0	0.0	0.5	0	0.0	0.1	
Total	115	100.0	100.0	27,468	100.0	100.0	100.0

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.

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

For the purposes of this review, loans made in calendar year 2021 or prior were analyzed based on 2011-2015 American Community Survey income designations for individuals[14]. Loans made in calendar year 2022 or after were analyzed based on 2016-2020 American Community Survey income designations for individuals.

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[14] *Income levels for individuals are calculated annually by the FFIEC using geographic definitions from the OMB, income data from the ACS and the Consumer Price Index from the Congressional Budget Office (.12(m) Income Levels).*

An analysis of loans was conducted to determine the level of lending to borrowers of different income levels and businesses of different sizes. Central Bank's loan distribution reflects adequate penetration among individuals of different income levels, including low- and moderate-income borrowers, and businesses of different sizes.

A detailed discussion of 2022 HMDA-reportable and CRA-reportable small business lending in relation to borrowers of different income levels and businesses of different sizes is provided below. Lending distribution of 2021 HMDA-reportable loans can be found in Appendix B.

<u>HMDA-Reportable Loans</u>

The borrower distribution of HMDA-reportable loans reflects good penetration among individuals of different income levels, including low- and moderate-income borrowers. In 2022, the bank originated 7.0 percent of its total HMDA-reportable loans to low-income borrowers, which is comparable to the aggregate and significantly below the percentage of low-income families in the assessment area at 7.1 percent and 18.5 percent, respectively. The bank originated 19.0 percent of its HMDA-reportable loans to moderate-income borrowers. This performance is comparable to the aggregate at 20.3 percent and the percentage of moderate-income families within the assessment area at 17.9 percent. The bank originated 13.9 percent of its HMDA-reportable loans to middle-income borrowers, below the aggregate at 23.5 percent and the proportion of middle-income families within the assessment area at 24.6 percent. The bank originated 48.7 percent of its HMDA-reportable loans to upper-income borrowers, which is significantly above the aggregate and above the percentage of upper-income families in the assessment area at 35.3 percent and 39.0 percent, respectively. Further, the bank originated 11.4 percent of its HMDA-reportable loans to individuals of unknown-income, which is comparable to aggregate at 13.8 percent.

Due to low volume, home improvement loans were not considered within the analysis of HMDA-reportable lending. Overall, the bank's performance in 2022 was comparable to its performance in 2021.

Home Purchase Loans

In 2022, the bank originated 8.0 percent of its home purchase loans to low-income borrowers, which is comparable to the aggregate and below the percentage of low-income families in the assessment area at 6.1 percent and 18.5 percent, respectively. The bank originated 20.4 percent of its home purchase loans to moderate-income borrowers. This performance is comparable to the aggregate at 20.9 percent and the percentage of moderate-income families within the assessment area at 17.9 percent. The bank originated 15.0 percent of its home purchase loans to middle-income borrowers, below the aggregate at 23.4 percent and the proportion of middle-income families within the assessment area at 24.6 percent. The bank originated the largest proportion of its home purchase loans to upper-income borrowers at 43.4 percent, which is above the aggregate and the percentage of upper-income families in the assessment area at 33.7 percent and 39.0 percent, respectively. Further, the bank originated 13.3 percent of its home purchase loans to individuals of

unknown income, which is comparable to the aggregate at 16.0 percent.

Refinance Loans

In 2022, the bank originated 5.7 percent of its refinance loans to low-income borrowers, which is below the aggregate and significantly below the percentage of low-income families in the assessment area at 9.9 percent and 18.5 percent, respectively. The bank originated 14.3 percent of its refinance loans to moderate-income borrowers. This performance is below the aggregate at 21.4 percent and the percentage of moderate-income families within the assessment area at 17.9 percent. The bank originated 8.6 percent of its refinance loans to middle-income borrowers, significantly below the aggregate at 23.4 percent and the proportion of middle-income families within the assessment area at 24.6 percent. The bank originated most of its refinance loans to upper-income borrowers at 62.9 percent, which is significantly above the aggregate and the percentage of upper-income families in the assessment area at 31.0 percent and 39.0 percent, respectively. Further, the bank originated 8.6 percent of its refinance loans to individuals of unknown income, below aggregate at 14.3 percent.

The following table presents the bank's borrower distribution of HMDA-reportable loans in 2022.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Sioux Falls, SD MSA 43620							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	9	8.0	6.1	973	2.7	3.1	18.5
Moderate	23	20.4	20.9	4,500	12.3	15.3	17.9
Middle	17	15.0	23.4	4,999	13.7	22.0	24.6
Upper	49	43.4	33.7	22,357	61.1	43.2	39.0
Unknown	15	13.3	16.0	3,784	10.3	16.4	0.0
Total	113	100.0	100.0	36,613	100.0	100.0	100.0
Refinance Loans							
Low	2	5.7	9.9	115	1.1	5.7	18.5
Moderate	5	14.3	21.4	815	8.0	16.0	17.9
Middle	3	8.6	23.4	479	4.7	20.9	24.6
Upper	22	62.9	31.0	8,286	81.1	40.5	39.0
Unknown	3	8.6	14.3	524	5.1	17.0	0.0
Total	35	100.0	100.0	10,219	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.9	0	0.0	3.8	18.5
Moderate	2	20.0	16.8	115	21.7	12.7	17.9
Middle	2	20.0	24.6	71	13.4	21.6	24.6
Upper	6	60.0	50.2	345	65.0	59.7	39.0
Unknown	0	0.0	2.6	0	0.0	2.1	0.0
Total	10	100.0	100.0	531	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	11	7.0	7.1	1,088	2.3	3.7	18.5
Moderate	30	19.0	20.3	5,430	11.5	15.3	17.9
Middle	22	13.9	23.5	5,549	11.7	21.6	24.6
Upper	77	48.7	35.3	30,988	65.4	43.5	39.0
Unknown	18	11.4	13.8	4,308	9.1	15.9	0.0
Total	158	100.0	100.0	47,363	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 Loans

The distribution of small business loans reflects poor penetration among businesses of different sizes. In 2022, Central Bank originated 31.3 percent of its business loans to businesses reporting annual revenues of $1 million or less, which was significantly below the aggregate at 52.2 percent and the percentage of businesses with gross revenues of $1 million or less at 89.8 percent. Of loans to businesses with revenues of $1 million or less, 36.1 percent were in amounts of $100,000 or less.

Loans in amounts of $100,000 or less are generally considered most beneficial for small businesses. A majority of the bank's business loans, 67.0 percent, were made to business with revenues of over $1 million.

The following table presents the bank's borrower distribution of small business loans in 2022.

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: Sioux Falls, SD MSA 43620						
	Bank And Aggregate Loans					Total
	Bank		Agg	Bank		Agg	Businesses
	#	#%	#%	$(000)	$%	$%	%
By Revenue						
$1 Million or Less	36	31.3	52.2	11,374	41.4	38.9	89.8
Over $1 Million	77	67.0		15,307	55.7		9.0
Revenue Unknown	2	1.7		787	2.9		1.2
Total	115	100.0		27,468	100.0		100.0
By Loan Size						
$100,000 or Less	33	28.7	84.5	1,769	6.4	21.8	
$100,001 - $250,000	45	39.1	7.0	6,945	25.3	15.9	
$250,001 - $1 Million	37	32.2	8.5	18,754	68.3	62.3	
Total	115	100.0	100.0	27,468	100.0	100.0	
By Loan Size and Revenues $1 Million or Less						
$100,000 or Less	13	36.1		725	6.4		
$100,001 - $250,000	8	22.2		1,386	12.2		
$250,001 - $1 Million	15	41.7		9,263	81.4		
Total	36	100.0		11,374	100.0		
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.*						

Community Development Lending

Central Bank made an adequate level of community development loans and made limited use of innovative or flexible lending practices in serving assessment area credit needs. During the evaluation period, the bank originated five loans totaling $6.3 million in the assessment area. Additionally, the bank originated 34 Paycheck Protection Program (PPP) loans totaling $4.3 million within the assessment area during the evaluation period that qualified for community development credit. This assessment area was not reviewed at the previous evaluation as the bank had only recently acquired branches in the Sioux Falls, SD MSA. The majority of the bank's dollars went to economic development projects, along with a significant share that were used to revitalize and stabilize low- and moderate-income geographies via PPP loans.

The following table presents the bank's qualified community development loans during the review period.

Qualified Community Development Loans by Purpose November 17, 2020 - January 22, 2024									
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalize/ Stabilize		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$
Sioux Falls, SD MSA	1	665	0	0	4	5,645	0	0	5	6,310
PPP	0	0	0	0	1	1,602	33	2,675	34	4,277

INVESTMENT TEST

Central Bank's performance relative to the investment test is rated low satisfactory. The bank made an adequate level of qualified community development investments and donations, particularly those not routinely provided by private investors, rarely in a leadership position. The bank made rare use of innovative or complex investments to support community development initiatives; however, the bank exhibited adequate responsiveness to credit and community development needs.

During the evaluation period, Central Bank made no qualified community development investments. Given the highly competitive nature of this assessment area, where two national bank's control a disproportionate amount of the deposits and lending, this lack of qualified community development investments does not indicate that the bank is not being responsive to the community development needs of the area.

Central Bank distributed a total of $73,766 in 33 qualified grants and donations in the current evaluation period. The substantial majority of grants and donations were made to organizations who serve community service purposes. Of note, the bank gave some of its largest donations to community service organizations that serve the most economically vulnerable populations in the area.

The following table presents the bank's qualified community development grants and donations during the review period.

Qualified Community Development Donations by Purpose November 17, 2020 - January 22, 2024									
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalize/ Stabilize		Total	
	#	$	#	$	#	$	#	$	#	$
Sioux Falls, SD MSA	1	800	30	61,966	1	10,000	1	1,000	33	73,766

SERVICE TEST

Central Bank's performance relative to the service test is rated high satisfactory. The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area and its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. Services do not vary in a way that inconveniences the needs of its assessment area, particularly low- and moderate-income geographies or low- and moderate-income individuals. The bank provides a relatively high level of community development services.

Retail Services

The distribution of the branch offices and ATMs is performed using current data (2022) and any changes in the median family income level of the geographies where the branches are located.

The assessment area contains three branches, each with cash-only ATMs, and one loan production office (LPO). The LPO has been opened since the previous evaluation, otherwise there have not been any branches opened or closed since the previous evaluation. One branch is in a low-income census tract, another is in a moderate-income census tract, and the third branch is in an upper-income census tract. The offices and ATMs in the assessment area represent 15.0 percent of the institution's total offices, based upon the combined assessment area.

Bank locations are open Monday through Friday with standard hours from 9:00 a.m. to 5:00 p.m., and drive-up available until 5:30 p.m. Additionally, three of the four branches offer drive-up availability from 9:00 a.m. to 12:00 p.m. on Saturdays. The bank's ATMs and online and mobile banking services expand the availability of services beyond the branches' regular operating hours. All products and services are consistent among all branches.

Community Development Services

Bank employees provided 691 hours within the assessment area, which is 10.7 percent of the total 6,472 total hours of qualified community development services. The services were performed for several organizations, primarily those who focused on community services.

The following table presents the bank's qualified community development services during the review period.

Community Development Services November 17, 2020 - January 22, 2024					
Assessment Area	**Affordable Housing**	**Community Service**	**Economic Development**	**Revitalize /Stabilize**	**Total Hours**
	# Hours	**# Hours**	**# Hours**	**# Hours**	
Sioux Falls, SD MSA	38	653	0	0	691

NON-METROPOLITAN BROOKINGS COUNTY, SD – Limited Review

SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the Performance Evaluation.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN BROOKINGS, SD [15]

Central Bank's Brookings County, SD Non-MSA assessment area consists of the entirety of Brookings County. Located within the assessment area is one branch location and three cash-only ATMs, all of which are located in middle-income census tracts. While the bank acquired the sole branch before the previous evaluation date, the assessment area was not reviewed under CRA. In 2022, the assessment area was comprised of seven census tracts: four middle- and three upper-income. There are no low-, moderate-, or distressed or underserved middle-income census tracts in the assessment area.

Tract Designation Change Data

The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

The following shows the changes in census tract designations by income since the previous evaluation.

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[15] *Census tract designations are based on American Community Survey income data. For years 2022 and after, the designations are based on 2016-2020 ACS data. For years 2021 and before, the designations are based on 2011-2015 ACS data. For examinations that include performance before and after 2022, both sets of data have been used to perform the analysis of bank activity in the respective timeframes.*

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	0	0
Moderate	1	0	-1
Middle	3	4	+1
Upper	2	3	+1
Unknown	0	0	0
Total	6	7	+1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015			
U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020			

According to the June 30, 2022, FDIC Deposit Market Share Report, Central Bank ranks fifth of the eight FDIC-insured financial institutions operating within the assessment area. The bank held $59.0 million in deposits, representing 3.1 percent of the total deposit market share. In comparison, the three largest financial institutions operating within the assessment area by deposit market share are First Bank & Trust (68.1 percent), Bankstar Financial (11.0 percent), and Wells Fargo, NA (7.9 percent).

Central Bank ranks fourth out of 87 aggregate lenders in 2022 HMDA-reportable transactions. A total of 23 originations and purchase transactions were reported by the bank compared to 223 reported by market leader First Bank & Trust. Further, the CRA Market Peer Report ranks Central Bank 10th out of 41 reporters with 20 CRA-reportable loans in 2022 compared to 286 loans reported by first-ranked First Bank & Trust.

Additional 2022 assessment area demographic information is presented in the following table.

2022 SD Non MSA Brookings County AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,000	14.4
Moderate	0	0.0	0	0.0	0	0.0	916	13.2
Middle	4	57.1	2,755	39.6	194	7.0	1,655	23.8
Upper	3	42.9	4,196	60.4	228	5.4	3,380	48.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	7	100.0	6,951	100.0	422	6.1	6,951	100.0

	Housing Units by Tract	Housing Type by Tract					
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,933	2,986	37.9	43.1	3,075	44.4	872	12.6
Upper	7,823	4,889	62.1	62.5	2,414	30.9	520	6.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	14,756	7,875	100.0	53.4	5,489	37.2	1,392	9.4

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	989	64.7	874	63.3	94	80.3	21	67.7
Upper	540	35.3	507	36.7	23	19.7	10	32.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,529	100.0	1,381	100.0	117	100.0	31	100.0
Percentage of Total Businesses:				90.3		7.7		2.0

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	106	49.5	103	49.8	3	42.9	0	0.0
Upper	108	50.5	104	50.2	4	57.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	214	100.0	207	100.0	7	100.0	0	0.0
Percentage of Total Farms:				96.7		3.3		0.0

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.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Brookings County, SD Non-MSA	Consistent	Consistent	Consistent

The institution's lending, investment, and service performance in the area is consistent with the institution's overall performance in the state of South Dakota.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: SD Non MSA Brookings County						
Geographic Income Level	**Bank And Aggregate Loans**					**Owner Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	42.9	36.3	609	29.8	30.6	37.9
Upper	4	57.1	63.7	1,435	70.2	69.4	62.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	2,044	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	50.0	44.3	294	55.8	37.3	37.9
Upper	3	50.0	55.7	233	44.2	62.7	62.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	527	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	47.2	0	0.0	44.6	37.9
Upper	0	0.0	52.8	0	0.0	55.4	62.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	66.7	88.9	300	42.3	97.8	53.9
Upper	1	33.3	11.1	410	57.7	2.2	46.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	710	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	8	50.0	39.4	1,203	36.7	40.7	37.9
Upper	8	50.0	60.6	2,078	63.3	59.3	62.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	3,281	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.							

Distribution of 2022 Small Business Lending By Income Level of Geography						
Assessment Area: SD Non MSA Brookings County						
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	54.5	58.1	541	45.0	64.4	64.7
Upper	5	45.5	40.5	661	55.0	35.5	35.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.4	0	0.0	0.2	
Total	11	100.0	100.0	1,202	100.0	100.0	100.0

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.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level						
Assessment Area: SD Non MSA Brookings County						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	3.9	0	0.0	2.2	14.4
Moderate	1	14.3	12.3	164	8.0	8.9	13.2
Middle	0	0.0	26.6	0	0.0	24.6	23.8
Upper	4	57.1	41.3	1,315	64.3	49.1	48.6
Unknown	2	28.6	15.9	565	27.6	15.2	0.0
Total	7	100.0	100.0	2,044	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.3	0	0.0	0.7	14.4
Moderate	2	33.3	16.0	223	42.3	13.8	13.2
Middle	1	16.7	25.2	125	23.7	20.9	23.8
Upper	2	33.3	44.3	138	26.2	51.4	48.6
Unknown	1	16.7	12.2	41	7.8	13.2	0.0
Total	6	100.0	100.0	527	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.8	0	0.0	3.7	14.4
Moderate	0	0.0	13.2	0	0.0	8.3	13.2
Middle	0	0.0	22.6	0	0.0	20.0	23.8
Upper	0	0.0	54.7	0	0.0	61.1	48.6
Unknown	0	0.0	5.7	0	0.0	7.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	3.5	0	0.0	1.9	14.4
Moderate	3	23.1	13.2	387	15.1	9.8	13.2
Middle	1	7.7	26.2	125	4.9	23.7	23.8
Upper	6	46.2	43.3	1,453	56.5	49.9	48.6
Unknown	3	23.1	13.8	606	23.6	14.7	0.0
Total	13	100.0	100.0	2,571	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.

Distribution of 2022 Small Business Lending By Revenue Size of Businesses Assessment Area: SD Non MSA Brookings County						
	Bank And Aggregate Loans					Total
	Bank		Agg	Bank		Agg	Businesses
	#	#%	#%	$(000)	$%	$%	%
By Revenue						
$1 Million or Less	8	72.7	59.1	575	47.8	45.0	90.3
Over $1 Million	3	27.3		627	52.2		7.7
Revenue Unknown	0	0.0		0	0.0		2.0
Total	11	100.0		1,202	100.0		100.0
By Loan Size						
$100,000 or Less	6	54.5	86.0	132	11.0	23.6	
$100,001 - $250,000	3	27.3	6.2	500	41.6	15.4	
$250,001 - $1 Million	2	18.2	7.8	570	47.4	61.0	
Total	11	100.0	100.0	1,202	100.0	100.0	
By Loan Size and Revenues $1 Million or Less						
$100,000 or Less	6	75.0		132	23.0		
$100,001 - $250,000	1	12.5		143	24.9		
$250,001 - $1 Million	1	12.5		300	52.2		
Total	8	100.0		575	100.0		

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.

Community Development Activities November 17, 2020 - January 22, 2024									
Brookings County, SD Non-MSA Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total #	Total $(000s)
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)		
Loans	0	0	0	0	0	0	0	0	0	0
Investments	0	0	0	0	0	0	0	0	0	0
Donations	3	1	14	14	0	0	0	0	17	15
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total Hours	
	Hours		Hours		Hours		Hours			
Services	18		151		0		0		169	

APPENDIX A – Maps of Assessment Areas

Central Bank 546544
Combined Assessment Area

Central Bank	CRA Performance Evaluation
Storm Lake, Iowa	January 22, 2024
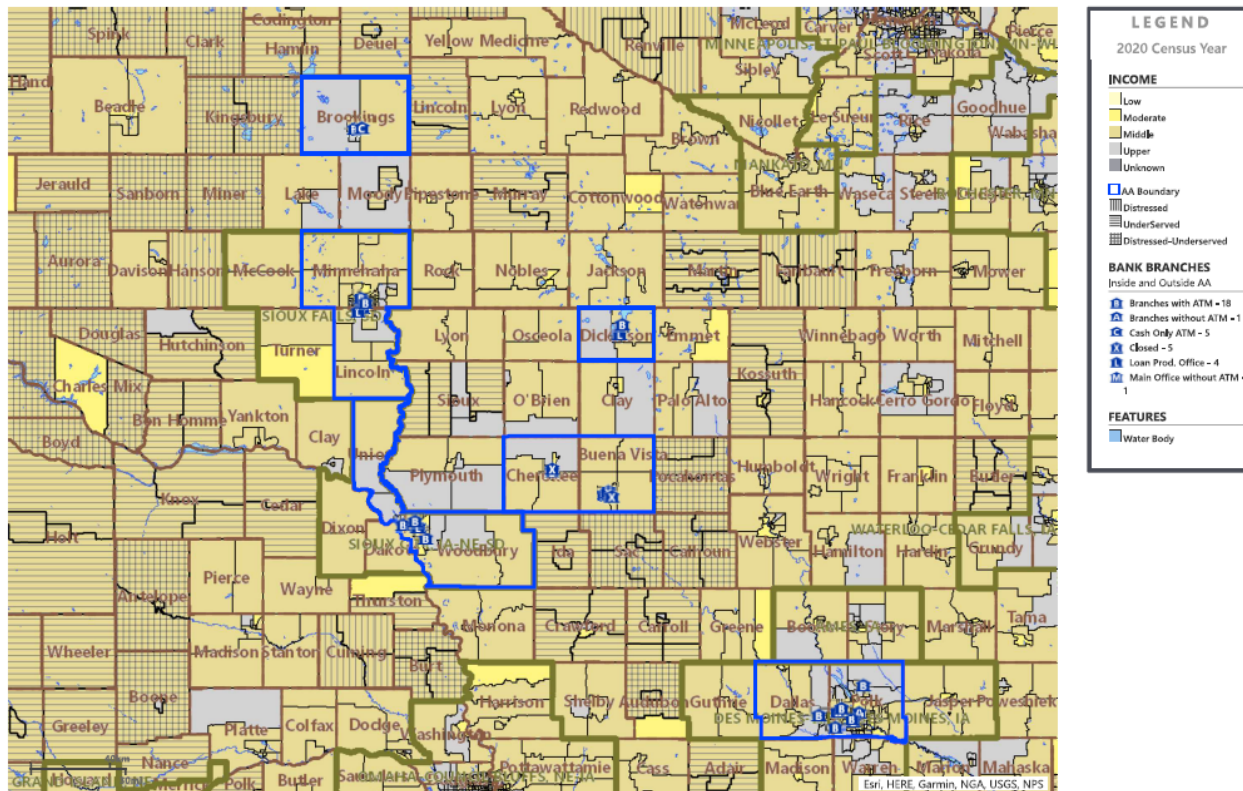
APPENDIX B – 2021 DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES

2021 Sioux City, IA-NE-SD MSA 43580 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	6.3	1,010	3.0	306	30.3	6,995	20.7
Moderate	8	25.0	7,117	21.0	1,699	23.9	5,959	17.6
Middle	12	37.5	13,205	39.0	1,158	8.8	7,607	22.5
Upper	9	28.1	12,527	37.0	583	4.7	13,298	39.3
Unknown	1	3.1	0	0.0	0	0.0	0	0.0
Total AA	32	100.0	33,859	100.0	3,746	11.1	33,859	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,365	411	1.2	17.4	1,713	72.4	241	10.2
Moderate	11,545	5,584	16.3	48.4	5,083	44.0	878	7.6
Middle	21,226	13,742	40.2	64.7	6,135	28.9	1,349	6.4
Upper	19,166	14,479	42.3	75.5	3,408	17.8	1,279	6.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	54,302	34,216	100.0	63.0	16,339	30.1	3,747	6.9

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	875	15.6	702	14.1	165	28.7	8	12.3
Moderate	779	13.9	658	13.3	117	20.4	4	6.2
Middle	1,735	31.0	1,589	32.0	125	21.8	21	32.3
Upper	2,212	39.5	2,013	40.6	167	29.1	32	49.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,601	100.0	4,962	100.0	574	100.0	65	100.0
Percentage of Total Businesses:			88.6		10.2			1.2

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.8	3	0.8	0	0.0	0	0.0
Moderate	3	0.8	3	0.8	0	0.0	0	0.0
Middle	176	45.1	175	45.5	1	20.0	0	0.0
Upper	208	53.3	204	53.0	4	80.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	390	100.0	385	100.0	5	100.0	0	0.0
Percentage of Total Farms:			98.7		1.3			0.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding.*

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Sioux City, IA-NE-SD MSA 43580							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	5	3.1	1.7	649	2.0	0.9	1.2
Moderate	19	11.9	13.9	1,882	5.7	8.6	16.3
Middle	46	28.8	40.4	7,559	23.1	35.2	40.2
Upper	90	56.3	44.0	22,690	69.2	55.2	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	160	100.0	100.0	32,780	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.7	0	0.0	0.4	1.2
Moderate	5	3.6	9.1	564	2.0	5.6	16.3
Middle	46	33.6	38.1	6,438	23.0	32.5	40.2
Upper	86	62.8	52.1	21,023	75.0	61.5	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	137	100.0	100.0	28,025	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.1	0	0.0	0.8	1.2
Moderate	0	0.0	13.7	0	0.0	12.2	16.3
Middle	1	33.3	40.4	13	7.7	35.5	40.2
Upper	2	66.7	43.8	155	92.3	51.5	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	168	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	1	50.0	20.0	1,876	84.7	38.1	15.5
Moderate	1	50.0	29.4	340	15.3	15.0	28.4
Middle	0	0.0	34.1	0	0.0	35.6	33.2
Upper	0	0.0	16.5	0	0.0	11.3	22.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	2,216	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	6	2.0	1.5	2,525	4.0	4.9	1.2
Moderate	25	8.3	11.8	2,786	4.4	8.1	16.3
Middle	93	30.8	38.9	14,010	22.2	33.9	40.2
Upper	178	58.9	47.9	43,868	69.4	53.0	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	302	100.0	100.0	63,189	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Borrower Income Level						
Assessment Area: Sioux City, IA-NE-SD MSA 43580						
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans						
Low	14	8.8	8.5	1,344	4.1	5.2	20.7
Moderate	42	26.3	26.9	6,362	19.4	20.5	17.6
Middle	41	25.6	23.3	6,994	21.3	22.8	22.5
Upper	60	37.5	27.4	16,291	49.7	39.0	39.3
Unknown	3	1.9	14.0	1,789	5.5	12.5	0.0
Total	160	100.0	100.0	32,780	100.0	100.0	100.0
Refinance Loans						
Low	6	4.4	6.9	413	1.5	3.5	20.7
Moderate	30	21.9	18.5	3,604	12.9	12.7	17.6
Middle	21	15.3	23.4	3,189	11.4	20.4	22.5
Upper	77	56.2	37.6	20,444	72.9	48.7	39.3
Unknown	3	2.2	13.7	375	1.3	14.7	0.0
Total	137	100.0	100.0	28,025	100.0	100.0	100.0
Home Improvement Loans						
Low	0	0.0	6.8	0	0.0	4.4	20.7
Moderate	1	33.3	22.6	13	7.7	17.5	17.6
Middle	0	0.0	21.2	0	0.0	23.6	22.5
Upper	2	66.7	43.2	155	92.3	43.8	39.3
Unknown	0	0.0	6.2	0	0.0	10.6	0.0
Total	3	100.0	100.0	168	100.0	100.0	100.0
Total Home Mortgage Loans						
Low	20	6.7	7.5	1,757	2.9	4.3	20.7
Moderate	73	24.3	21.9	9,979	16.4	16.5	17.6
Middle	62	20.7	23.0	10,183	16.7	21.5	22.5
Upper	139	46.3	33.3	36,890	60.5	43.8	39.3
Unknown	6	2.0	14.3	2,164	3.5	13.9	0.0
Total	300	100.0	100.0	60,973	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 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.

2021 Des Moines-West Des Moines, IA MSA 19780 AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	9	8.0	6,000	4.5	1,837	30.6	27,494	20.5
Moderate	29	25.7	27,416	20.4	4,423	16.1	22,716	16.9
Middle	45	39.8	53,257	39.7	3,687	6.9	28,783	21.4
Upper	29	25.7	47,521	35.4	1,421	3.0	55,201	41.1
Unknown	1	0.9	0	0.0	0	0.0	0	0.0
Total AA	**113**	**100.0**	**134,194**	**100.0**	**11,368**	**8.5**	**134,194**	**100.0**

	Housing Units by Tract	Housing Type by Tract					
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	11,086	3,902	2.8	35.2	5,840	52.7	1,344	12.1
Moderate	47,514	26,477	18.8	55.7	17,052	35.9	3,985	8.4
Middle	90,671	58,325	41.4	64.3	26,352	29.1	5,994	6.6
Upper	69,306	52,076	37.0	75.1	14,618	21.1	2,612	3.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**218,577**	**140,780**	**100.0**	**64.4**	**63,862**	**29.2**	**13,935**	**6.4**

	Total Businesses by Tract	Businesses by Tract & Revenue Size					
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,002	3.8	873	3.6	121	5.2	8	2.9
Moderate	3,698	13.9	3,338	13.9	337	14.4	23	8.3
Middle	12,821	48.3	11,421	47.7	1,246	53.1	154	55.4
Upper	9,034	34.0	8,300	34.7	641	27.3	93	33.5
Unknown	8	0.0	6	0.0	2	0.1	0	0.0
Total AA	**26,563**	**100.0**	**23,938**	**100.0**	**2,347**	**100.0**	**278**	**100.0**
Percentage of Total Businesses:			**90.1**		**8.8**		**1.0**

	Total Farms by Tract	Farms by Tract & Revenue Size					
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	0.5	3	0.5	0	0.0	0	0.0
Moderate	42	6.5	40	6.4	2	13.3	0	0.0
Middle	364	56.5	356	56.7	8	53.3	0	0.0
Upper	235	36.5	229	36.5	5	33.3	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**644**	**100.0**	**628**	**100.0**	**15**	**100.0**	**1**	**100.0**
Percentage of Total Farms:			**97.5**		**2.3**		**0.2**

Source: 2021 FFIEC Census Data
    2021 Dun & Bradstreet Data
    2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography						
Assessment Area: Des Moines-West Des Moines, IA MSA 19780						
Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	1	0.6	2.1	99	0.2	1.2	2.8
Moderate	14	9.1	15.4	2,249	5.0	9.5	18.8
Middle	64	41.6	39.3	18,890	42.0	37.9	41.4
Upper	75	48.7	43.2	23,781	52.8	51.4	37.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	154	100.0	100.0	45,019	100.0	100.0	100.0
Refinance Loans							
Low	2	1.4	1.1	174	0.5	0.6	2.8
Moderate	17	11.6	10.8	2,053	6.4	6.3	18.8
Middle	56	38.1	38.2	10,476	32.8	35.6	41.4
Upper	72	49.0	49.9	19,277	60.3	57.4	37.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	147	100.0	100.0	31,980	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.7	0	0.0	1.3	2.8
Moderate	0	0.0	11.9	0	0.0	8.9	18.8
Middle	2	50.0	38.4	45	33.3	37.3	41.4
Upper	2	50.0	48.0	90	66.7	52.5	37.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	135	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	9.3	0	0.0	5.4	7.4
Moderate	3	75.0	36.0	5,068	76.6	22.9	19.8
Middle	1	25.0	36.0	1,552	23.4	44.8	45.6
Upper	0	0.0	18.7	0	0.0	26.9	27.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	6,620	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	3	1.0	1.6	273	0.3	1.3	2.8
Moderate	34	11.0	13.0	9,370	11.2	9.2	18.8
Middle	123	39.8	38.7	30,963	37.0	37.4	41.4
Upper	149	48.2	46.7	43,148	51.5	52.1	37.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	309	100.0	100.0	83,754	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Borrower Income Level						
Assessment Area: Des Moines-West Des Moines, IA MSA 19780						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans						
Low	3	1.9	10.3	426	0.9	5.7	20.5
Moderate	31	20.1	22.5	6,561	14.6	17.2	16.9
Middle	41	26.6	21.2	9,896	22.0	20.9	21.4
Upper	67	43.5	26.9	25,710	57.1	36.1	41.1
Unknown	12	7.8	19.0	2,426	5.4	20.1	0.0
Total	154	100.0	100.0	45,019	100.0	100.0	100.0
Refinance Loans						
Low	14	9.5	6.4	1,260	3.9	3.4	20.5
Moderate	20	13.6	15.8	2,530	7.9	11.2	16.9
Middle	35	23.8	20.1	6,453	20.2	17.6	21.4
Upper	68	46.3	35.3	20,045	62.7	44.5	41.1
Unknown	10	6.8	22.4	1,692	5.3	23.4	0.0
Total	147	100.0	100.0	31,980	100.0	100.0	100.0
Home Improvement Loans						
Low	0	0.0	7.7	0	0.0	4.9	20.5
Moderate	0	0.0	15.7	0	0.0	11.2	16.9
Middle	3	75.0	22.8	65	48.1	20.5	21.4
Upper	0	0.0	51.3	0	0.0	58.9	41.1
Unknown	1	25.0	2.5	70	51.9	4.5	0.0
Total	4	100.0	100.0	135	100.0	100.0	100.0
Total Home Mortgage Loans						
Low	17	5.6	8.1	1,686	2.2	4.5	20.5
Moderate	51	16.7	18.6	9,091	11.8	14.0	16.9
Middle	79	25.9	20.6	16,414	21.3	19.2	21.4
Upper	135	44.3	32.5	45,755	59.3	40.7	41.1
Unknown	23	7.5	20.2	4,188	5.4	21.6	0.0
Total	305	100.0	100.0	77,134	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 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.

2021 IA Non MSA Buena Vista and Cherokee Counties AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,519	18.1
Moderate	1	10.0	1,410	16.8	207	14.7	1,604	19.1
Middle	8	80.0	6,480	77.2	497	7.7	2,055	24.5
Upper	1	10.0	504	6.0	31	6.2	3,216	38.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**8,394**	**100.0**	**735**	**8.8**	**8,394**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**					
		Owner-occupied			**Rental**		**Vacant**
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,410	1,277	13.9	53.0	910	37.8	223	9.3
Middle	10,760	7,383	80.3	68.6	2,684	24.9	693	6.4
Upper	859	537	5.8	62.5	178	20.7	144	16.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**14,029**	**9,197**	**100.0**	**65.6**	**3,772**	**26.9**	**1,060**	**7.6**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**				
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	258	16.6	228	16.2	23	20.4	7	19.4
Middle	1,203	77.3	1,095	77.8	85	75.2	23	63.9
Upper	95	6.1	84	6.0	5	4.4	6	16.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,556**	**100.0**	**1,407**	**100.0**	**113**	**100.0**	**36**	**100.0**
Percentage of Total Businesses:				**90.4**		**7.3**		**2.3**

	Total Farms by Tract		**Farms by Tract & Revenue Size**				
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	2.7	12	2.7	0	0.0	0	0.0
Middle	363	81.4	360	81.3	3	100.0	0	0.0
Upper	71	15.9	71	16.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**446**	**100.0**	**443**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.3**		**0.7**		**0.0**

Source: 2021 FFIEC Census Data
*   2021 Dun & Bradstreet Data*
*   2011-2015 U.S. Census Bureau: American Community Survey*
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							Owner Occupied Units %
Geographic Income Level	Bank And Aggregate Loans						
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	44	27.3	19.7	7,262	32.4	22.7	13.9
Middle	117	72.7	77.0	15,120	67.6	74.9	80.3
Upper	0	0.0	3.4	0	0.0	2.4	5.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	161	100.0	100.0	22,382	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	31	29.2	19.1	4,325	32.7	19.4	13.9
Middle	74	69.8	76.2	8,807	66.7	75.8	80.3
Upper	1	0.9	4.6	76	0.6	4.8	5.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	106	100.0	100.0	13,208	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	44.4	23.5	97	32.0	14.5	13.9
Middle	5	55.6	76.5	206	68.0	85.5	80.3
Upper	0	0.0	0.0	0	0.0	0.0	5.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	303	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	40.0	31.6	4,949	86.7	70.2	37.9
Middle	5	50.0	63.2	660	11.6	28.5	61.6
Upper	1	10.0	5.3	100	1.8	1.3	0.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	5,709	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	83	29.0	20.1	16,633	40.0	24.8	13.9
Middle	201	70.3	76.0	24,793	59.6	72.0	80.3
Upper	2	0.7	3.9	176	0.4	3.2	5.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	286	100.0	100.0	41,602	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: IA Non MSA Buena Vista and Cherokee Counties							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	11	6.8	11.8	1,052	4.7	6.4	18.1
Moderate	61	37.9	34.8	7,039	31.4	27.9	19.1
Middle	43	26.7	21.3	6,162	27.5	23.6	24.5
Upper	30	18.6	19.2	5,022	22.4	27.2	38.3
Unknown	16	9.9	12.9	3,107	13.9	14.9	0.0
Total	161	100.0	100.0	22,382	100.0	100.0	100.0
Refinance Loans							
Low	7	6.6	5.2	477	3.6	3.1	18.1
Moderate	33	31.1	25.6	3,178	24.1	20.6	19.1
Middle	25	23.6	25.0	2,695	20.4	22.0	24.5
Upper	39	36.8	34.0	6,629	50.2	44.7	38.3
Unknown	2	1.9	10.2	229	1.7	9.7	0.0
Total	106	100.0	100.0	13,208	100.0	100.0	100.0
Home Improvement Loans							
Low	1	11.1	11.8	18	5.9	10.1	18.1
Moderate	0	0.0	5.9	0	0.0	4.0	19.1
Middle	1	11.1	17.6	101	33.3	25.7	24.5
Upper	7	77.8	58.8	184	60.7	56.7	38.3
Unknown	0	0.0	5.9	0	0.0	3.4	0.0
Total	9	100.0	100.0	303	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	19	6.9	9.1	1,547	4.3	5.2	18.1
Moderate	94	34.1	29.7	10,217	28.5	24.6	19.1
Middle	69	25.0	22.7	8,958	25.0	22.9	24.5
Upper	76	27.5	26.4	11,835	33.0	34.3	38.3
Unknown	18	6.5	12.2	3,336	9.3	13.1	0.0
Total	276	100.0	100.0	35,893	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 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.

2021 Sioux Falls, SD MSA 43620 AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	10,877	18.9
Moderate	17	32.1	14,446	25.0	2,242	15.5	10,331	17.9
Middle	24	45.3	28,765	49.9	1,672	5.8	14,052	24.4
Upper	12	22.6	14,484	25.1	219	1.5	22,435	38.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**53**	**100.0**	**57,695**	**100.0**	**4,133**	**7.2**	**57,695**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	30,611	12,629	21.5	41.3	15,640	51.1	2,342	7.7
Middle	42,455	30,472	51.8	71.8	9,921	23.4	2,062	4.9
Upper	20,467	15,681	26.7	76.6	3,834	18.7	952	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**93,533**	**58,782**	**100.0**	**62.8**	**29,395**	**31.4**	**5,356**	**5.7**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4,312	37.0	3,685	35.2	601	55.8	26	22.0
Middle	4,407	37.8	4,064	38.9	283	26.3	60	50.8
Upper	2,933	25.2	2,708	25.9	193	17.9	32	27.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11,652**	**100.0**	**10,457**	**100.0**	**1,077**	**100.0**	**118**	**100.0**
Percentage of Total Businesses:			**89.7**		**9.2**		**1.0**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	24	3.9	23	3.8	1	10.0	0	0.0
Middle	445	72.4	436	72.3	8	80.0	1	50.0
Upper	146	23.7	144	23.9	1	10.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**615**	**100.0**	**603**	**100.0**	**10**	**100.0**	**2**	**100.0**
Percentage of Total Farms:			**98.0**		**1.6**		**0.3**	

Source: *2021 FFIEC Census Data*
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Sioux Falls, SD MSA 43620							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	11.8	17.8	1,441	7.2	12.0	21.5
Middle	35	51.5	49.8	9,377	47.0	48.4	51.8
Upper	25	36.8	32.4	9,121	45.7	39.7	26.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	68	100.0	100.0	19,939	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	10.9	13.5	959	4.7	8.4	21.5
Middle	34	53.1	51.7	9,451	46.1	48.3	51.8
Upper	23	35.9	34.8	10,111	49.3	43.3	26.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	64	100.0	100.0	20,521	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.3	0	0.0	7.3	21.5
Middle	0	0.0	49.8	0	0.0	41.6	51.8
Upper	0	0.0	36.9	0	0.0	51.1	26.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	42.9	46.1	2,240	5.4	21.6	53.6
Middle	0	0.0	29.1	0	0.0	28.7	32.4
Upper	4	57.1	24.8	39,228	94.6	49.7	14.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	41,468	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	18	12.9	15.6	4,640	5.7	11.3	21.5
Middle	69	49.6	50.5	18,828	23.0	46.1	51.8
Upper	52	37.4	33.8	58,460	71.4	42.6	26.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	139	100.0	100.0	81,928	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
　　　　2011-2015 U.S. Census Bureau: American Community Survey
Note:　　Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Borrower Income Level						
Assessment Area: Sioux Falls, SD MSA 43620						
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans						
Low	2	2.9	7.9	280	1.4	4.5	18.9
Moderate	13	19.1	23.7	2,556	12.8	18.4	17.9
Middle	17	25.0	21.8	3,895	19.5	20.3	24.4
Upper	28	41.2	31.7	11,534	57.8	40.6	38.9
Unknown	8	11.8	15.0	1,674	8.4	16.3	0.0
Total	68	100.0	100.0	19,939	100.0	100.0	100.0
Refinance Loans						
Low	2	3.1	6.6	188	0.9	3.6	18.9
Moderate	11	17.2	18.3	1,564	7.6	13.1	17.9
Middle	6	9.4	20.6	1,613	7.9	18.0	24.4
Upper	45	70.3	34.2	17,156	83.6	44.0	38.9
Unknown	0	0.0	20.4	0	0.0	21.3	0.0
Total	64	100.0	100.0	20,521	100.0	100.0	100.0
Home Improvement Loans						
Low	0	0.0	5.7	0	0.0	2.4	18.9
Moderate	0	0.0	12.9	0	0.0	4.6	17.9
Middle	0	0.0	22.1	0	0.0	15.7	24.4
Upper	0	0.0	51.3	0	0.0	66.2	38.9
Unknown	0	0.0	8.0	0	0.0	11.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans						
Low	4	3.0	7.1	468	1.2	4.0	18.9
Moderate	24	18.2	20.4	4,120	10.2	15.5	17.9
Middle	23	17.4	21.0	5,508	13.6	19.0	24.4
Upper	73	55.3	33.6	28,690	70.9	42.7	38.9
Unknown	8	6.1	18.0	1,674	4.1	18.8	0.0
Total	132	100.0	100.0	40,460	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

   2011-2015 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.

2021 SD Non MSA Brookings County AA Demographics							
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,154	16.1
Moderate	1	16.7	1,037	14.5	138	13.3	1,195	16.7
Middle	3	50.0	3,793	52.9	286	7.5	1,575	22.0
Upper	2	33.3	2,344	32.7	83	3.5	3,250	45.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	7,174	100.0	507	7.1	7,174	100.0

	Housing Units by Tract	Housing Type by Tract					
		Owner-occupied		Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,829	920	12.5	32.5	1,380	48.8	529	18.7
Middle	7,296	3,722	50.7	51.0	3,011	41.3	563	7.7
Upper	3,513	2,697	36.7	76.8	595	16.9	221	6.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	13,638	7,339	100.0	53.8	4,986	36.6	1,313	9.6

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	489	30.9	446	31.0	37	31.9	6	20.7
Middle	652	41.2	604	42.0	40	34.5	8	27.6
Upper	443	28.0	389	27.0	39	33.6	15	51.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,584	100.0	1,439	100.0	116	100.0	29	100.0
Percentage of Total Businesses:			90.8		7.3		1.8	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.3	4	1.9	1	12.5	0	0.0
Middle	99	45.6	96	45.9	3	37.5	0	0.0
Upper	113	52.1	109	52.2	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	217	100.0	209	100.0	8	100.0	0	0.0
Percentage of Total Farms:			96.3		3.7		0.0	

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: SD Non MSA Brookings County						
Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans						
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	11.9	115	36.1	8.9	12.5
Middle	1	50.0	45.0	204	63.9	45.7	50.7
Upper	0	0.0	43.1	0	0.0	45.4	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	319	100.0	100.0	100.0
Refinance Loans						
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	20.8	4.4	390	8.7	2.8	12.5
Middle	12	50.0	53.2	1,806	40.3	53.2	50.7
Upper	7	29.2	42.4	2,283	51.0	44.0	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	4,479	100.0	100.0	100.0
Home Improvement Loans						
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.5	0	0.0	3.3	12.5
Middle	0	0.0	37.5	0	0.0	42.2	50.7
Upper	1	100.0	55.0	50	100.0	54.5	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	50	100.0	100.0	100.0
Multifamily Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	31.3	611	57.6	47.4	26.1
Middle	1	50.0	56.3	450	42.4	47.0	67.3
Upper	0	0.0	12.5	0	0.0	5.6	6.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,061	100.0	100.0	100.0
Total Home Mortgage Loans						Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	24.1	8.3	1,116	18.9	8.9	12.5
Middle	14	48.3	49.2	2,460	41.6	49.4	50.7
Upper	8	27.6	42.4	2,333	39.5	41.8	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	5,909	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey						
Note: Percentages may not total 100.0 percent due to rounding.						

Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: SD Non MSA Brookings County						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	3.6	0	0.0	2.1	16.1
Moderate	2	100.0	15.9	319	100.0	12.7	16.7
Middle	0	0.0	24.8	0	0.0	23.6	22.0
Upper	0	0.0	41.5	0	0.0	47.5	45.3
Unknown	0	0.0	14.3	0	0.0	14.1	0.0
Total	2	100.0	100.0	319	100.0	100.0	100.0
Refinance Loans							
Low	2	8.3	2.4	209	4.7	1.4	16.1
Moderate	4	16.7	9.9	445	9.9	7.0	16.7
Middle	5	20.8	22.6	531	11.9	18.3	22.0
Upper	8	33.3	46.2	2,571	57.4	53.2	45.3
Unknown	5	20.8	18.9	723	16.1	20.1	0.0
Total	24	100.0	100.0	4,479	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	16.1
Moderate	0	0.0	7.5	0	0.0	8.6	16.7
Middle	0	0.0	12.5	0	0.0	10.0	22.0
Upper	1	100.0	60.0	50	100.0	74.4	45.3
Unknown	0	0.0	20.0	0	0.0	7.0	0.0
Total	1	100.0	100.0	50	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	2	7.4	2.9	209	4.3	1.7	16.1
Moderate	6	22.2	12.6	764	15.8	9.9	16.7
Middle	5	18.5	22.7	531	11.0	20.7	22.0
Upper	9	33.3	45.5	2,621	54.1	50.8	45.3
Unknown	5	18.5	16.3	723	14.9	16.8	0.0
Total	27	100.0	100.0	4,848	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 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.

2021 IA Non MSA Dickinson County AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	584	11.3
Moderate	0	0.0	0	0.0	0	0.0	771	14.9
Middle	2	40.0	2,250	43.6	146	6.5	1,346	26.1
Upper	3	60.0	2,912	56.4	39	1.3	2,461	47.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**5**	**100.0**	**5,162**	**100.0**	**185**	**3.6**	**5,162**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,558	2,504	42.5	38.2	931	14.2	3,123	47.6
Upper	6,529	3,387	57.5	51.9	982	15.0	2,160	33.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**13,087**	**5,891**	**100.0**	**45.0**	**1,913**	**14.6**	**5,283**	**40.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	549	45.0	499	45.0	38	42.7	12	57.1
Upper	671	55.0	611	55.0	51	57.3	9	42.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,220**	**100.0**	**1,110**	**100.0**	**89**	**100.0**	**21**	**100.0**
Percentage of Total Businesses:				**91.0**		**7.3**		**1.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	49	40.2	49	40.8	0	0.0	0	0.0
Upper	73	59.8	71	59.2	2	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**122**	**100.0**	**120**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.4**		**1.6**		**0.0**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

	Bank And Aggregate Loans						Owner Occupied Units %
Geographic Income Level	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	21	37.5	39.1	9,669	50.2	43.2	42.5
Upper	35	62.5	60.9	9,607	49.8	56.8	57.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	56	100.0	100.0	19,276	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	18	32.1	42.1	6,644	43.7	49.6	42.5
Upper	38	67.9	57.9	8,564	56.3	50.4	57.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	56	100.0	100.0	15,208	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	33.8	0	0.0	23.6	42.5
Upper	5	100.0	64.8	588	100.0	73.2	57.5
Unknown	0	0.0	1.4	0	0.0	3.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	588	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	57.1	0	0.0	90.6	64.8
Upper	1	100.0	42.9	280	100.0	9.4	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	280	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	39	33.1	40.6	16,313	46.1	46.8	42.5
Upper	79	66.9	59.4	19,039	53.9	53.1	57.5
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	118	100.0	100.0	35,352	100.0	100.0	100.0

Distribution of 2021 Home Mortgage Lending By Income Level of Geography
Assessment Area: IA Non MSA Dickinson County

Source: 2021 FFIEC Census Data
    2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Borrower Income Level						
Assessment Area: IA Non MSA Dickinson County						
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	2	3.6	4.5	112	0.6	1.6	11.3
Moderate	10	17.9	13.6	1,674	8.7	7.1	14.9
Middle	11	19.6	14.4	2,026	10.5	9.7	26.1
Upper	23	41.1	50.2	9,955	51.6	60.9	47.7
Unknown	10	17.9	17.3	5,509	28.6	20.6	0.0
Total	56	100.0	100.0	19,276	100.0	100.0	100.0
Refinance Loans							
Low	2	3.6	4.2	212	1.4	1.7	11.3
Moderate	7	12.5	12.4	639	4.2	6.2	14.9
Middle	8	14.3	16.4	1,758	11.6	11.3	26.1
Upper	39	69.6	48.6	12,599	82.8	61.9	47.7
Unknown	0	0.0	18.4	0	0.0	19.0	0.0
Total	56	100.0	100.0	15,208	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.2	0	0.0	4.5	11.3
Moderate	3	60.0	16.9	86	14.6	8.7	14.9
Middle	0	0.0	25.4	0	0.0	13.7	26.1
Upper	0	0.0	40.8	0	0.0	48.6	47.7
Unknown	2	40.0	12.7	502	85.4	24.5	0.0
Total	5	100.0	100.0	588	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	3.4	4.5	324	0.9	1.7	11.3
Moderate	20	17.1	13.2	2,399	6.8	6.7	14.9
Middle	19	16.2	15.8	3,784	10.8	10.5	26.1
Upper	62	53.0	49.3	22,554	64.3	61.5	47.7
Unknown	12	10.3	17.2	6,011	17.1	19.5	0.0
Total	117	100.0	100.0	35,072	100.0	100.0	100.0
Source: 2021 FFIEC Census Data							
2011-2015 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.							

APPENDIX C – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	HMDA-reportable loans: January 1, 2021, to December 31, 2022 CRA-reportable small business and farm lending: January 1, 2022, to December 31, 2022 Community development activity: November 17, 2020, to January 22, 2024		
FINANCIAL INSTITUTION Central Bank, Storm Lake, Iowa			**PRODUCTS REVIEWED** HMDA-reportable loans CRA-reportable small business and small farm loans
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED**
None	N/A		N/A

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	**TYPE OF EXAMINATION**	**BRANCHES VISITED**	**OTHER INFORMATION**
Sioux City, IA-NE-SD MSA #43580	Full scope	None	CRA-reportable small farm loans not reviewed for borrower and geographic distribution
Des Moines – West Des Moines, IA MSA #19780	Full scope	None	CRA-reportable small farm loans not reviewed for borrower and geographic distribution
Non-MSA Buena Vista & Cherokee Counties, IA	Full scope	None	None
Sioux Falls, SD MSA #43620	Full scope	None	CRA-reportable small farm loans not reviewed for borrower and geographic distribution

| Non-MSA Dickinson County, IA | Limited scope | None | CRA-reportable small farm loans not reviewed for borrower and geographic distribution |
| Non-MSA Brookings County, SD | Limited scope | None | CRA-reportable small farm loans not reviewed for borrower and geographic distribution |

APPENDIX D – Glossary

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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the "five-year estimate data." The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.[16]

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an uninsured state branch (other than a limited branch) of a foreign bank described in section

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[16] *Source: FFIEC press release dated October 19, 2011.*

228.11(c)(2).

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

Census tract: Small subdivisions 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. They 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.

Combined Statistical Area (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide nonmetropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:
1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. 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
4. Activities that revitalize or stabilize low- or moderate-income geographies.

   Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:
   1) Low- or moderate-income geographies;
   2) Designated disaster areas; or
   3) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:

a. Rates of poverty, unemployment, or population loss; or
b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

1) Has as its primary purpose community development; and
2) Except in the case of a wholesale or limited purpose bank –
    a. Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
    b. Benefits the bank's assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s).

Community Development Service: A community development service means a service that:

1) Has as its primary purpose community development; and
2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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 household and no wife present) or "female householder" (a family with a female householder and no husband present).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th

percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act: The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

1) Low-income – an 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 census tract;
2) Moderate-income – an 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 census tract;
3) Middle-income – an 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 census tract; and
4) Upper-income – an 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 census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

1) Consumer loan is located in the census tract where the borrower resides;
2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan production office (LPO): This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) 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 it and half below it.

Metropolitan Area: 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 single core population of at

least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of Month 31 of either of the prior two calendar years, had assets of less than $1.252 billion. Intermediate small bank means a small bank with assets of at least $313 million as of Month 31 of both of the prior two calendar years and less than $1.252 billion as of Month 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of $1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of $500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).