

PUBLIC DISCLOSURE

December 17, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Banner Bank
Certificate Number: 28489

10 South First Avenue
Walla Walla, Washington 99362

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
San Francisco Regional Office

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San Francisco, California 94105

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Outstanding**.

An institution in this group has an outstanding record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

The Lending Test is rated High Satisfactory.

Lending levels reflect good responsiveness to assessment area (AA) credit needs; a substantial majority of loans were made within the institution's AAs; the geographic distribution of loans reflects good penetration throughout the AA and the distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. The bank exhibits a good record of serving the credit needs of the most economically disadvantaged areas of the AAs, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices; is a leader in making community development (CD) loans; and makes use of innovative and/or flexible lending practices in order to serve the AA's credit needs.

The Investment Test is rated Outstanding.

Banner Bank (BB) has an excellent level of CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits good responsiveness to credit and CD needs and occasionally uses innovative and/or complex investments to support CD initiatives.

The Service Test is rated Outstanding.

Delivery systems are accessible to essentially all portions of the institution's AAs; to the extent changes have been made, the institution's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income (LMI) geographies and/or to LMI individuals; business hours and services do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or LMI individuals; and the institution is a leader in providing CD services.

DESCRIPTION OF INSTITUTION

BB is a state-chartered institution headquartered in Walla Walla, Washington. The bank is wholly-owned by Banner Corporation, a two-bank holding company also located in Walla Walla. BB has two subsidiaries. The bank's only lending subsidiary is Community Financial Corporation. The other, Springer Development, LLC, is primarily engaged as the title holder of BB's real estate owned properties. The bank did not elect to include lending activity of any subsidiaries in this evaluation. No merger or acquisition activity has occurred since the previous evaluation.

BB offers a broad range of products and services via a network of 137 branch offices throughout Washington, Oregon, California, and Idaho. Since the previous evaluation, the bank closed 18 branches (9 in Washington, 4 in Oregon, 1 in California, 2 in Portland-Vancouver-Hillsboro (PVH) Multistate, 1 in Idaho, and 1 in Lewiston Multistate). While the institution remains primarily focused on commercial lending, BB also offers home mortgage, consumer, and agricultural loans. Deposit products include personal and business checking, savings, and money market accounts, as well as certificates of deposit.

As of September 30, 2024, assets totaled \$16.1 billion, including total loans of \$11.3 billion and total deposits of \$13.6 billion. There have been no material changes to the financial condition since the previous evaluation. The following table details the banks' loan portfolio distribution by loan category.

Loan Portfolio Distribution as of 9/30/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	1,538,609	13.6
Secured by Farmland	193,750	1.7
Secured by 1-4 Family Residential Properties	2,449,161	21.7
Secured by Multifamily (5 or more) Residential Properties	1,061,770	9.4
Secured by Nonfarm Nonresidential Properties	4,246,213	37.6
Total Real Estate Loans	9,489,503	84.0
Commercial and Industrial Loans	1,132,392	10.0
Agricultural Production and Other Loans to Farmers	194,812	1.7
Consumer Loans	101,547	0.9
Obligations of State and Political Subdivisions in the U.S.	384,035	3.3
Other Loans	1,158	0.1
Lease Financing Receivable (net of unearned income)	-	-
Less: Unearned Income	-	-
Total Loans	11,303,447	100.0
<i>Source: Reports of Condition and Income</i>		

The institution received an "Outstanding" rating at the previous CRA Performance Evaluation dated April 6, 2021, based on Interagency Large Institution Examination Procedures. Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet AA credit needs.

DESCRIPTION OF ASSESSMENT AREAS

BB's delineated AA consists of 6 rated areas and 23 individual AA; see the following table for details. Refer to each AA for additional information.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Washington			
Seattle-Tacoma CSA	King, Snohomish, Pierce, Skagit	905	24
Kennewick-Richland-Walla Walla CSA	Benton, Franklin, Walla Walla	81	9
Bellingham MSA	Whatcom	54	5
Spokane-Spokane Valley MSA	Spokane, Stevens	130	9
Washington Non-MSA	Grant, Whitman, Columbia, San Juan	45	8
Wenatchee MSA	Chelan, Douglas	32	2
Yakima MSA	Yakima	57	6
California			
Los Angeles-Long Beach CSA	Los Angeles, Riverside, San Bernardino	3,482	8
California Non-MSA	Siskiyou	16	3
Chico MSA	Butte	54	1
Redding-Red Bluff CSA	Shasta, Tehama	64	3
Sacramento-Roseville CSA	Nevada, Placer, Sacramento, Yolo	534	7
San Diego-Chula Vista, Carlsbad MSA	San Diego	737	8
Santa Rosa-Petaluma MSA	Sonoma	100	0
Oregon			
Oregon Non-MSA	Baker, Coos, Douglas, Morrow, Umatilla, Union	87	14
Eugene-Springfield MSA	Lane	93	8
Medford-Grants Pass CSA	Jackson, Josephine	74	5
PVH Multistate MSA	Clark (WA), Clackamas (WA), Multnomah (WA), Washington (OR)	533	7
Idaho			
Boise City MSA	Ada, Canyon	183	4
Coeur d'Alene MSA	Koontenai	39	0
Idaho Non-MSA	Benewah, Clearwater, Latah	14	3
Twin Falls MSA	Twin Falls	17	1
Lewiston Multistate MSA	Asotin, Nez Perce	16	2
<i>Source: Bank Data. Note: The above table only includes those branches which were open during the full review period.</i>			

As of February 11, 2022, the bank closed its sole branch in Sonoma County, California and exited the Santa Rosa-Petaluma MSA. Performance conclusions for this AA are limited to the bank's activities in 2021.

As of June 24, 2022, BB divested all branches in Stevens County, Washington. Therefore, Stevens County is only included in performance conclusions for the Spokane-Spokane Valley MSA for 2021 and a portion of 2022.

As of June 24, 2022, the bank closed its only branch in Kootenai County, Idaho and exited the Coeur d'Alene MSA. Performance conclusions for this AA are limited to the bank's activities in 2021 and the applicable portion of 2022.

SCOPE OF EVALUATION

General Information

Examiners used Interagency Large Institution CRA Examination Procedures to review the bank's performance from the prior evaluation, dated April 6, 2021, to the current evaluation, dated December 17, 2024.

Based on the distribution of branches, deposits and reported loans, Washington contributes the greatest weight to overall conclusions, followed by California, Oregon and the PVH Multistate MSA. Idaho and the Lewiston Multistate MSA contributed minimal weight to overall ratings based on the same factors. Each rated area had at least one AA selected for a full-scope review; refer to each for complete details. The weighting for full- and limited-scope reviews follows the same criteria as those noted for the rated areas.

Activities Reviewed

Based upon the bank's business strategy, and the number and dollar volume of originations reported on the Home Mortgage Disclosure Act loan application registers and CRA loan registers, the examiners determined that BB's major product lines are home mortgage and small business loans. Home mortgage loans represent the highest dollar volume of lending activity and contribute the greatest weight in forming conclusions. Small business loan originations represent the largest number of loan originations; however, the uptick in volume is limited to 2021 and is reflective of loans made through the Small Business Administration's Payment Protection Program (PPP). Loans made under this program were designed to help businesses keep their workforces employed during the COVID-19 crisis. The program ended May 31, 2021. The following table includes details of the loan products reviewed.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Home Mortgage	14,850	5,979,865	14,850	5,979,865
Small Business	14,246	2,339,261	14,246	2,339,261
Source: Bank Data				

Small farm lending is not included in this evaluation. It doesn't represent a major product line and BB is not a market leader for such loans in any of the bank's AAs. In 2021, BB originated 447 small farm loans totaling approximately \$47.2 million. In 2022, the bank originated 150 small farm loans totaling approximately \$22.6 million and in 2023, small farm lending dropped to 122 originations totaling approximately \$21.0 million. Consumer lending is also excluded as it doesn't represent a major product line and wasn't requested by the bank for inclusion in the evaluation.

Examiners analyzed and presented full years of lending activity for 2021, 2022 and 2023. Home mortgage and small business lending performance was compared to the aggregate performance of other lenders operating in each AA for the applicable years. Demographic comparisons for home mortgage lending in 2021 are based on 2015 ACS data and 2020 U.S. Census data was used for demographic comparisons in 2022 and 2023. D&B data for each year in the evaluation period serves as the demographic comparison for small business lending. Performance analysis is

conducted on both the number and dollar amount of loans; however, performance based on the number of loans carries more weight as it provides a better representation of the actual number of individuals and business served.

Examiners reviewed the bank's delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings or closings during the evaluation period. A review of BB's retail banking products and services was also conducted to determine the extent to which they are targeted to LMI individuals or small business and/or tailored to meet specific needs within the AAs.

Examiners considered all CD lending, investment and service activity from the date of the previous evaluation through the date of the current evaluation in forming CD conclusions.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

BB's Lending Test performance is rated "High Satisfactory." Performance in each rated area is consistent with this conclusion except in the state of Oregon, PVH Multistate MSA, and Lewiston Multistate MSA, where performance was "Low Satisfactory."

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. Please refer to the Lending Inside and Outside of the Assessment Area table for the number and dollar of originations by year and product and refer to individual AAs for respective market share and market ranks for products analyzed.

Home mortgage lending within the bank's AAs decreased each year during the evaluation period throughout BB's AAs; however, the institution's market share generally remained stable. Management attributes the substantial decline in both purchase and refinancing mortgage volume to the significant rise in interest rates and affordability concerns coupled with economic concerns, including the continual fears of a recession. This trend was seen across the industry, impacting BB and other lenders, large and small. This is supported by the sharp decrease in home loan originations reported in Peer Mortgage Data. In 2021, BB launched a First Time Home Buyer Education Initiative to provide education for future borrowers, with a focus on reaching LMI retail customers. The initiative appears to have bolstered BB's performance in some of the bank's market areas. To date, BB has provided 413 homebuyer education classes to over 3,500 participants and developed relationships with non-profit, affordable housing providers working with LMI individuals and families.

BB's small business loan originations also declined during the evaluation period. A large drop in small business loan volume from 2021 to 2022 can be partially attributed to the discontinuation of PPP lending. Bank management also notes that merger and acquisition activity in BB's market areas introduced a disadvantage when competing with newly merged, larger peer institutions. At the same time, BB maintained a conservative credit culture, increased emphasis on commercial and industrial lending and deemphasized commercial real-estate lending. These elements contributed to the decrease in overall small business lending. In turn, BB developed a new role, the small business consultant, to provide depository and lending support and created the Banner Bank Business University designed to address the needs of small business owners. To date, 36 small business consultants have graduated, with the goal of increasing resources across the bank's footprint.

Assessment Area Concentration

A substantial majority of loans are made in the bank's AA as depicted in the following table.

Lending Inside and Outside of the Assessment Area											
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
Home Mortgage											
2021	5,874	90.0	655	10.0	6,529	2,139,123	85.2	372,309	14.8	2,511,432	
2022	4,796	89.7	553	10.3	5,349	1,675,613	80.7	400,142	19.3	2,075,755	
2023	2,606	87.7	366	12.3	2,972	1,140,692	81.9	251,986	18.1	1,392,678	
Subtotal	13,276	89.4	1,574	10.6	14,850	4,955,428	82.9	1,024,437	17.1	5,979,865	
Small Business											
2021	7,486	95.0	397	5.0	7,883	991,007	93.1	73,977	6.9	1,064,984	
2022	3,355	93.5	233	6.5	3,588	677,973	91.3	64,869	8.7	742,842	
2023	2,539	91.5	236	8.5	2,775	466,592	87.8	64,843	12.2	531,435	
Subtotal	13,380	93.9	866	6.1	14,246	2,135,572	91.3	203,689	8.7	2,339,261	
Total	26,656	91.6	2,440	8.4	29,096	7,091,000	85.2	1,229,126	14.8	8,319,126	
Source: HMDA Reported Data; CRA Reported Data											

Geographic Distribution

Overall, the geographic distribution of loans reflects good penetration throughout the AAs. Performance across the rated areas is consistent with this conclusion except in the PVH Multistate MSA, where performance was below the overall conclusion, though still adequate. Refer to the Scope of Evaluation for rated area weighting and to each respective analysis for details on performance.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. Performance across all rated areas is consistent with this conclusion except for the State of Oregon, where the performance was stronger. Refer to the Scope of Evaluation for rated area weighting and to each respective analysis for details on performance.

Innovative or Flexible Lending Practices

BB makes use of innovative and/or flexible lending practices to serve AA credit needs. Information reported by the bank is included in the following table. Most of the bank's loan programs are available throughout the bank's areas; however, additional, expanded programs are also available in specific AAs. The bank's use of these programs is only discussed in the bank-wide section of this evaluation, with examples of each.

Innovative and flexible lending decreased since the previous evaluation, where BB originated 22,176 loans totaling nearly \$2.8 billion; however, a large portion of loan volume was due to 13,270 PPP loan originations totaling \$1.6 billion. BB's performance is comparable to other similarly situated institutions.

BB utilized 38 separate loan programs over the evaluation period, five of which are proprietary. The bank originated 5,772 loans totaling approximately \$1.1 billion through its own programs. This represents a decrease in number and increase in dollar amount from the 7,134 loans totaling \$792.0

million the bank originated through its own programs at the previous evaluation. Utilization of the BB Affordable Mortgage Program and the BB Affordable Mortgage Program Down Payment Assistance (DPA) increased from a combined 363 loans totaling \$48.8 million at the previous evaluation to a combined 776 loans totaling \$99.1 million at the current evaluation. These programs may be used separately or together and are designed to provide more flexible loan terms for LMI borrowers.

There was also a notable increase in the dollar volume of originations for BB's Quick Step Loan Program, which provides a streamlined application and underwriting process for business borrowers to more swiftly meet capital needs with financing of \$50,000 to \$1.0 million. The QuickStep Business Loan products include an option to allow commercial loans up to \$1,000,000 and lines of credit up to \$500,000. During the evaluation period, BB's originations totaled approximately \$1.0 billion, compared to \$741.9 million at the previous evaluation. The bank also continues to be a designated SBA Preferred Lender with the ability to make final decisions on SBA-guaranteed loans, enabling customers to obtain funds faster than non-preferred lenders.

Innovative or Flexible Lending Programs										
Type of Program	2021		2022		2023		2024		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
BB Affordable Mortgage Program	120	21,009	176	28,632	184	34,609	84	13,278	564	97,528
BB Affordable Mortgage Program DPA	29	197	71	494	77	639	35	267	212	1,597
BB HomeFresh 2 nd Mortgage	-	-	1	37	6	216	3	46	10	299
BB CHP	10	3,049	12	4,560	6	2,277	2	658	30	10,544
BB QuickStep Loan Program	1,114	238,432	1,617	330,898	1,252	266,891	973	230,851	4,956	1,067,072
Bienestar	-	-	-	-	-	-	2	60	2	60
CalHFA	-	-	3	236	12	1,930	24	3,731	39	5,897
CASA of OR	3	27	-	-	1	12	1	6	5	45
Comm. Connections of NE OR	-	-	-	-	-	-	1	30	1	30
Comm. LendingWorks	1	11	1	11	-	-	-	-	2	22
Corvallis Neighborhood Housing Svcs.	9	131	3	49	7	209	8	301	27	690
Farm Service Agency	-	-	1	500	2	804	-	-	3	1,304
FHLB of Des Moines	5	38	10	2,153	8	1,895	6	3,075	29	7,161
FHA	160	50,112	88	28,162	105	34,569	123	46,465	476	159,308
Habitat for Humanity	26	1,712	3	426	14	1,947	15	1,866	58	5,951
Hacienda Comm. Dev. Center	1	15	-	-	-	-	-	-	1	15
Homeownership Center NW	2	33	-	-	-	-	-	-	2	33
Homes for Good	1	5	-	-	-	-	-	-	1	5
Idaho Housing Finance Association	69	15,104	14	3,622	14	2,828	6	1,446	103	23,000
Kulshan Comm. Land Trust	5	155	-	-	1	98	-	-	6	253
Lummi Nation Housing Authority	-	-	1	10	-	-	-	-	1	10
Municipal Programs	6	320	7	296	9	344	17	946	39	1,906
Neighborworks	-	-	7	187	-	-	3	121	10	308
Network for Affordable Housing	8	342	17	3,024	18	2,239	50	7,005	93	12,610
Nixyaawii Comm. Financial Services	-	-	-	-	2	17	-	-	2	17
Oregon Dept. of Veterans' Affairs	2	748	1	133	1	242	1	400	5	1,523
Oregon Housing & Comm. Services	8	1,995	8	1,313	20	4,006	41	5,680	77	12,994
Parkview Services	-	-	-	-	-	-	1	100	1	100
Portland Housing Center	2	23	-	-	1	40	3	62	6	125
Proud Ground	-	-	1	120	9	309	16	542	26	971
SBA Loans	257	75,204	182	52,208	196	44,699	118	67,358	753	239,469
SBA PPP Loans	630	52,132	-	-	-	-	-	-	630	52,132
Swinomish Indian Tribal Comm.	-	-	-	-	-	-	1	20	1	20
Town of Paradise	-	-	-	-	-	-	1	100	1	100
USDA	16	4,082	14	3,369	3	617	3	833	36	8,901
Veterans Administration	176	64,961	41	16,745	29	11,624	41	18,382	287	111,712
WA Comm. Reinvestment Association	7	1,096	4	543	3	384	20	2,807	34	4,830
WSHFC	153	15,962	33	3,567	74	7,797	157	20,259	417	47,585
Totals	2,820	546,895	2,316	481,295	2,054	421,242	1,756	426,695	8,946	1,876,127

BB also offers flexible lending through a number of other vehicles throughout the bank's footprint. The following are examples of programs that are unique to some of the bank's AAs:

- The Washington State Housing Finance Commission (WSHFC) administers and supports the House Key State Bond Loan Program through the use of bonds authorized by the State of Washington. In addition to other requirements, the House Key program requires that a buyer must earn 80 percent or less of the area's median income adjusted for family size. The House Key Plus program is offered to qualified LMI families throughout Washington to provide down payment assistance. BB funded 417 loans totaling \$47.5 million through this program during the evaluation period.
- BB partners with the California Housing Finance Association (CalHFA) to offer MYHome, Dream For All Shared Appreciation and Dream For All Conventional Loan programs to provide assistance with down payments and/or closing costs for residents of California. The bank originated 39 loans totaling \$5.9 million through these programs since the last evaluation.
- The bank originated 77 loans totaling \$13.0 million through the Oregon Housing and Community Services program. The program is available throughout Oregon and provides flexible down payment assistance in collaboration with approved mortgage lenders. Borrowers can use funds from the down payment to cover up to 100.0 percent of the borrower's cash requirements at closing, including the down payment, closing costs, pre-paid items, upfront mortgage insurance, and other related loan expenses.
- Idaho Housing Finance Association is available throughout the state and offers loans with low mortgage rates, down payment and closing costs assistance, tax credits worth up \$2,000 per year, low or no mortgage insurance, homebuyer education, and free housing counseling. BB originated 103 loans through this program during the evaluation period for a total of \$23.0 million.

Community Development Loans

BB is a leader in making CD loans throughout its AAs. Performance was consistent across all rated areas except Oregon and the Lewiston Multistate MSA, where the bank made an adequate level of CD loans. Refer to the Scope of Evaluation for rated area weighting and to the full-scope AAs for further details, including loan originations for each year by CD category and additional examples.

Overall CD lending activity represents 10.6 percent of average total assets and 16.8 percent of average total loans. This performance represents a decrease by number of CD loans, however, an increase by dollar volume from the prior evaluation, where BB made 334 CD loans totaling \$1.1 million, representing 9.3 percent of average total assets and 12.7 percent of average total loans. BB's performance is above similarly situated institutions and focused on CD loans primarily targeted affordable housing initiatives, demonstrating BB's responsiveness for community development lending. The following table details the bank's CD lending by rated area and purpose.

Community Development Lending										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Washington	46	343,985	4	8,881	6	15,698	3	12,312	59	380,876
California	74	935,604	10	14,126	4	8,506	2	7,134	90	965,370
Oregon	11	70,729	10	18,760	1	2,000	2	16,315	24	107,804
PVH Multistate	18	165,130	2	350	1	1,100	-	-	21	166,580
Idaho	9	65,350	2	1,430	-	-	-	-	11	66,780
Lewiston Multistate	1	5,900	-	-	-	-	-	-	1	5,900
Nationwide Activities	4	14,936	-	-	-	-	-	-	4	14,936
Total	163	1,601,634	28	43,547	12	27,304	7	35,761	210	1,708,246
<i>Source: Bank Data</i>										

Notable examples of BB's CD loans are as follows:

- In 2021, the bank originated a \$5.1 million loan for affordable housing for the purchase of a multifamily property located in a moderate-income CT where all units are rent controlled for LMI individuals and families.
- In 2021, the bank originated a \$6.1 million loan to revitalize and stabilize the city sewer system in a low-income CT.
- In 2024, the bank originated a \$42.5 million affordable housing loan for the construction of a multifamily property located in a moderate-income CT where all units are rent controlled targeting LMI seniors.
- BB is involved in a lending consortium and made a total of 4 CD loans totaling \$14.9 million targeted to affordable housing initiatives for LMI individuals and families.

INVESTMENT TEST

BB is rated "Outstanding" in the Investment Test. The bank's performance is consistent with this conclusion in each rated area except for Idaho and the Lewiston Multistate MSA AA, where performance was below the rated area conclusion, although they were still satisfactory. Refer to each respective analysis for details. When arriving at the overall Investment Test rating, the institution's dollar volume of CD investments and donations received the most weight, but the qualitative impact to the community's credit needs were a significant rating factor as well.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. CD investments, which include new and prior period investments, combined with grants and donations, total approximately \$365.3 million. BB invested approximately \$199.9 million in 603 new qualified

investments, including \$2.9 million in 757 qualified grants and donations during the review period. The institution also maintains approximately \$165.4 million in 51 prior period investments.

Total qualified investments represent 2.3 percent of total average assets and 9.7 percent of total average securities as of the September 30, 2024, Call Report. Total qualified investments declined as a percentage of average total securities from the previous evaluation when total qualified investments represented 13.1 percent of average total securities. However, total qualified investments grew as a percentage of average total assets from the previous evaluation when total qualified investments represented 2.1 percent of average total assets. The dollar volume of CD investments increased with the institution's asset growth during the review period, going from approximately \$251.9 million at the prior evaluation to approximately \$365.3 million at this evaluation.

The institution's qualified investments are primarily comprised of activities that support affordable housing and community services targeting LMI populations. Though the number of donations declined, the dollar volume of investments has grown significantly. Refer to each respective full-scope section for specific examples of BB's investments and donations.

The following table shows a breakdown of qualified investments and donations activity by area and CD category.

Community Development Qualified Investments by Assessment Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Washington	70	94,022	144	50,122	8	37	-	-	222	144,181
California	101	91,376	95	38,635	41	119	1	250	238	130,380
Oregon	32	25,069	92	27,312	17	72	-	-	141	52,453
PVH Multistate	14	8,355	20	12,112	3	8	-	-	37	20,475
Idaho	8	8,890	26	1,303	1	800	-	-	35	10,993
Lewiston Multistate	-	-	7	3,770	1	3,055	-	-	8	6,825
Total	225	227,712	384	133,254	71	4,091	1	250	681	365,307
<i>Source: Bank Data</i>										

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs. The bank's emphasis on affordable housing investments is responsive to a need for more affordable housing in the AAs identified by community contacts.

Community Development Initiatives

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. BB's qualified investments help support affordable housing needs in the bank's AAs and many investments are innovative or complex, including low-income housing tax credit, and private equity investments.

A CD financial institution investment promotes access to capital and local economic growth through its programs with direct funding injections that provide financial services, investment opportunities, loan availability, and technical assistance to distressed or underserved communities and populations. A certified CD financial institution must meet strict eligibility requirements with its primary objective to provide CD services. An equity equivalent investment is a long-term fully subordinated debt instrument. A CD financial institution can leverage this instrument with senior debt to build its lending capacity. Only a non-profit CD financial institution can use an equity equivalent investment.

A low-income housing tax credit (LIHTC) investment provides tax incentives to encourage individual and corporate investors to invest in the acquisition, development, and rehabilitation of affordable rental housing. The instrument provides for an indirect federal subsidy that finances low-income housing. This allows an investor to claim tax credits on their federal income tax return. To qualify for the credit, a project must meet strict requirements to qualify as a low-income project.

A private equity investment is a type of alternative investment in which the investors purchase shares in privately held businesses. Private equity is offered to specialized investment funds and limited partnerships that take an active role in the management and structuring of certain companies to develop targeted projects, such as affordable housing units.

SERVICE TEST

Service Test performance is rated “Outstanding.” This conclusion is consistent across all rated areas except for the Lewiston Multistate MSA.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s six rated areas. The institution offers online banking with bill pay through its website; mobile banking that includes mobile deposit; telephone banking with automated information, live agents, and text features; and electronic statements for convenient account data. Zelle is also offered as a portal for customers to receive and send money. The institution does not charge fees on non-proprietary ATMs, which expands its customer accessibility. In addition, the institution does not charge fees on Electronic Benefit Transfer (EBT) cards when used at proprietary ATMs; as the EBT is an electronic system that provides funds to qualifying low-income families to purchase food, this service is especially helpful to LMI individuals. Alternative delivery systems are available to customers throughout the rated areas and discussed only in this section.

The institution operates a total of 137 branches, 124 ATMs, and 9 loan production offices (LPOs) throughout the six rated areas, and distribution differs between the areas. Refer to each area analysis for supplemental information.

Changes in Branch Locations

To the extent changes have been made, the institution’s record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Branch closures were most significant in Washington and

Oregon. Refer to the following table for branch changes and to the specific AAs for the impact of branch changes on LMI geographies and/or to LMI individuals.

Branch Changes				
Rated Area/Assessment Area	Opened		Closed	
	#	%	#	%
Washington	-	-	9	50.0
Seattle-Tacoma CSA	-	-	2	11.0
Wenatchee MSA	-	-	-	-
Kennewick-Richland-Walla Walla CSA	-	-	1	5.6
Bellingham MSA	-	-	-	-
Spokane-Spokane Valley MSA	-	-	5	27.8
Washington Non-MSA	-	-	-	-
Yakima MSA	-	-	1	5.6
California	-	-	1	5.6
Los Angeles-Long Beach CSA	-	-	-	-
California Non-MSA	-	-	-	-
Chico MSA	-	-	-	-
Redding-Red Bluff CSA	-	-	-	-
Sacramento-Roseville CSA	-	-	-	-
San-Diego-Chula Vista-Carlsbad MSA	-	-	-	-
Santa Rosa-Petaluma MSA	-	-	1	5.6
Oregon	-	-	4	22.2
Oregon Non-MSA	-	-	2	11.0
Eugene-Springfield MSA	-	-	1	5.6
Medford-Grants Pass CSA	-	-	1	5.6
PVH Multistate	-	-	2	11.0
Idaho	-	-	1	5.6
Boise City MSA	-	-	-	-
Coeur d'Alene MSA	-	-	1	5.6
Idaho Non-MSA	-	-	-	-
Twin Falls MSA	-	-	-	-
Lewiston Multistate	-	-	1	5.6
Total	0	0.0	18	100.0
<i>Source: Bank Data</i>				

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or LMI individuals. Most branch locations offer the institution's full range of commercial and consumer deposit and lending products; refer to the Description of Institution section for more details. Hours of operation are generally similar throughout the six rated areas, and the majority of branch locations offer a drive-through service and extended Friday hours. Several locations in Washington also offer Saturday hours; refer to the Washington rated area for additional details.

Community Development Services

BB is a leader in providing CD services; see the following table. Bank employees provided 21,895 service hours to 323 different CD organizations in the bank's AA. By hour, services provided by bank employees almost doubled since the prior evaluation, where the bank provided 11,290 hours of service to 273 different CD organizations. BB's performance at the current evaluation has improved

from the previous evaluation and is favorable in comparison to peer institutions. The majority of hours supported community service initiatives, an identified CD need in many rated areas, which demonstrates BB's responsiveness during the review period. Also, bank employees provided 54 hours CD service hours outside the bank's rated areas during the review period, focusing on community service and affordable housing. Refer to each respective analysis for details on the bank's CD services and examples.

Community Development Services by Rated Area					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Washington	1,375	7,549	1,497	64	10,485
California	435	2,882	836	-	4,153
Oregon	789	3,461	481	61	4,792
PVH Multistate	317	806	85	-	1,208
Idaho	90	686	262	-	1,038
Lewiston Multistate	11	102	52	-	165
Regional Activities	-	-	-	-	-
Nationwide Activities	22	32	-	-	54
Total	3,039	15,518	3,213	125	21,895
<i>Source: Bank Data</i>					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

WASHINGTON

CRA RATING FOR WASHINGTON: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON

The Washington rated area consists of seven AAs covering the majority of the State. Refer to the bank-wide Description of Assessment Areas for a detailed list. BB did not add any AAs to the rated area during the review period; however, in June 2022, the bank closed three branches and exited Stevens County, in the Spokane-Spokane Valley MSA. BB still maintains operations in the MSA in Spokane County. Performance analysis in Stevens County is limited to 2021 and the applicable portion of 2022. No other changes occurred to the bank's Washington AAs during the evaluation period.

SCOPE OF EVALUATION – WASHINGTON

Based on lending activity, deposit volume and branch distribution, the Seattle-Tacoma CSA AA was reviewed using full-scope procedures and contributes the greatest weight to overall conclusions. The remaining AAs in Washington were reviewed using limited-scope procedures with the Spokane-Spokane Valley MSA receiving the greatest consideration in determining overall conclusions, followed in decreasing weight by the Kennewick-Richland-Walla Walla CSA, Yakima MSA, Washington Non-MSA, and Bellingham MSA. The Wenatchee MSA was randomly selected to receive a full-scope review, as the AA has not been reviewed using full-scope procedures at either of the two previous CRA Evaluations and contributed the least weight to overall performance conclusions.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON

LENDING TEST

Lending Test performance in Washington is "High Satisfactory." Performance across all AAs is consistent with this conclusion except in the Wenatchee MSA AA, where performance was weaker than state of Washington, but it is still satisfactory.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. Product trends in Washington are consistent with overall bank performance; see bank-wide section for discussion. Market share and relative market rank for products reviewed varied by AA. Refer to the individual AAs for detail.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AAs. Performance across all AAs is consistent with this conclusion except the Spokane-Spokane Valley MSA, Bellingham MSA, and Washington Non-MSA AAs, where performance was weaker, but still satisfactory. Performance in the Yakima MSA AA was above the overall conclusion. Refer to the individual AAs for detail.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. Performance across all AAs is consistent with this conclusion except the Spokane-Spokane Valley MSA, Kennewick-Richland-Walla Walla CSA, and Bellingham MSA AAs, where performance was above the overall conclusion. Refer to the individual AAs for detail.

Community Development Loans

BB is a leader in making CD loans in Washington. Performance in all AAs is consistent with this conclusion, except the Wenatchee MSA where performance was adequate. CD lending in Washington was lower in the total number of loans, but generally consistent with the dollar amount compared to the previous evaluation where the bank originated 135 CD loans totaling \$393.3 million. The difference in number and volume of loans is largely attributed to PPP lending in effect during the previous evaluation period. The majority of CD loans went toward affordable housing, an identified CD need. The following table details the bank's CD lending by rated area and purpose.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Seattle-Tacoma CSA	24	195,713	1	8,000	1	1,635	1	1,053	27	206,401
Kennewick-Richland-Walla Walla CSA	4	21,150	-	-	-	-	2	11,259	6	32,409
Bellingham MSA	4	41,730	-	-	1	1,225	-	-	5	42,955
Spokane-Spokane Valley MSA	5	16,832	2	581	-	-	-	-	7	17,413
WA Non-MSA	2	27,500	-	-	1	10,000	-	-	3	37,500
Wenatchee MSA	1	13,100	-	-	-	-	-	-	1	13,100
Yakima MSA	4	22,510	1	300	3	2,838	-	-	8	25,648
Statewide Activities	2	5,450	-	-	-	-	-	-	2	5,450
Total	46	343,985	4	8,881	6	15,698	3	12,312	59	380,876
<i>Source: Bank Data</i>										

An example of BB's CD lending includes 2 loans totaling \$5.4 million that provided 184 units of affordable housing that benefitted the larger rated area.

INVESTMENT TEST

BB is rated “Outstanding” in the Investment Test for the state of Washington. The institution’s performance in the Seattle-Tacoma CSA AA, Kennewick-Richland-Walla Walla CSA AA and Yakima MSA AA were consistent with this conclusion. Performance in the Wenatchee MSA AA, Bellingham MSA AA, Spokane-Spokane Valley MSA AA, and Washington Non-MSA AA were below the rated area conclusion.

Investment and Grant Activity

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. BB reported 222 qualified investments and donations that total approximately \$144.2 million in the state. By dollar, this level is an increase from the prior evaluation when the institution’s qualified investments and donations totaled approximately \$75.7 million. The total amount of new CRA-qualified investments reported was approximately \$70.4 million. BB held approximately \$73.8 million in prior period investments and reported approximately \$949,000 in grants and donations in the state.

The current dollar amount of investments and donations in the state of Washington is 39.0 percent of the institution’s total qualified CD investments and donations for all the rated areas combined. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Community Development Qualified Investments by Assessment Area - WA										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Seattle-Tacoma CSA	8	47,339	3	17,500	-	-	-	-	11	64,839
Kennewick-Richland-Walla Walla CSA	1	8,710	5	18,475	-	-	-	-	6	27,185
Bellingham MSA	1	7,500	1	2,845	-	-	-	-	2	10,345
Spokane-Spokane Valley MSA	1	14,165	-	-	-	-	-	-	1	14,165
WA Non-MSA	-	-	1	5,000	-	-	-	-	1	5,000
Wenatchee MSA	1	1,000			-	-	-	-	1	1,000
Yakima MSA	4	11,748	6	5,435	-	-	-	-	10	17,183
Statewide Activities	1	3,280	4	235	-	-	-	-	5	3,515
Subtotal	17	93,742	20	49,490	-	-	-	-	37	143,232
Grants/Donations	53	280	124	632	8	37	-	-	185	949
Total	70	94,022	144	50,122	8	37	-	-	222	144,181

Source: Bank Data

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs. The bank’s emphasis on affordable housing investments in the state of Washington is responsive to a need to provide more affordable housing resources to LMI individuals and families.

Community Development Initiatives

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. Some of BB's qualified investments are considered innovative and complex as certain new investments and those held by the institution during the review period are LIHTC and private equity investments.

SERVICE TEST

Washington Service Test performance is "Outstanding." Performance in all AAs in Washington is consistent with this rating.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution's AAs in Washington. The institution operates 63 full-service branches, 60 ATMs, and 6 LPOs in the AAs. Alternative delivery systems available in Washington are consistent with the overall institution; refer to the bank-wide discussion for further details. Branch distribution varies by AA; refer to the specific AA analysis for more information.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The institution did not open any branches in the Washington AAs since the previous performance evaluation, but did close nine branches, with three branches located in moderate-income tracts, five branches located in middle-income tracts, and one branch located in an upper-income tract. Refer to the bank-wide section for an overall summary and the specific AAs for additional details.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the seven Washington AAs, particularly LMI geographies and/or LMI individuals. Business hours and services in Washington are comparable with the hours and services discussed in the bank-wide section. Saturday hours are provided at the drive-through at four branches in the Seattle-Tacoma CSA AA, with two branches located in moderate-income tracts; at the drive-through at one branch in the Kennewick-Richland-Walla Walla CSA AA; in the lobby at one branch in the Bellingham MSA AA; in the lobby at one branch located in a moderate-income tract in the Spokane-Spokane Valley MSA AA; and at the drive-through at one branch located in a low-income tract in the Yakima MSA AA. These Saturday hours support the institution's overall reasonableness of business hours in Washington.

Community Development Services

The institution is a leader in providing CD services in Washington. BB employees provided a total of 10,485 service hours to 411 different CD organizations. CD service levels significantly increased from the prior evaluation, when employees provided a total of 5,050 hours. Hours have more than doubled since the prior evaluation. The majority of CD service hours are for the provision of community services, an identified CD need in most of the Washington AAs. Service hours were provided in each Washington AA, with nearly 40.0 percent of the bank's total hours provided in the Seattle-Tacoma CSA AA, where the bank maintains the largest physical presence. The following table includes the state of Washington's CD service activity.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Seattle-Tacoma CSA	550	2,882	685	-	4,117
Kennewick-Richland-Walla Walla CSA	298	1,276	217	22	1,813
Bellingham MSA	6	295	233	-	534
Spokane-Spokane Valley MSA	176	1,623	26	-	1,825
WA Non-MSA	95	285	132	42	554
Wenatchee MSA	228	267	48	-	543
Yakima MSA	-	919	156	-	1,075
Statewide Activities	22	2	-	-	24
Total	1,375	7,549	1,497	64	10,485
<i>Source: Bank Data</i>					

As shown in the preceding table, a small number of service hours were provided to the regional Washington area. Both instances involved financial education to first-time homebuyer class to LMI individuals.

SEATTLE-TACOMA CSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SEATTLE-TACOMA CSA ASSESSMENT AREA

The Seattle-Tacoma CSA AA is in the northwestern portion of Washington and consists of:

- All 495 CTs of King County and all 175 CTs of Snohomish County, which together form the Seattle-Bellevue-Kent MSA; and
- All 193 CTs of Pierce County which form the Tacoma-Lakewood MD; and
- All 42 CTs of Skagit County, which form the Mount Vernon-Anacortes MSA.

No changes were made to this AA since the previous evaluation.

Economic and Demographic Data

According to 2020 U.S. Census Data, the Seattle-Tacoma CSA contained 42 low- 195 moderate-, 379 middle- and 271 upper-income CTs. Eighteen CTs have no income designation. The following table provides key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Seattle-Tacoma CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	905	4.6	21.5	41.9	29.9	2.0
Population by Geography	4,148,285	4.8	22.0	41.5	30.6	1.2
Housing Units by Geography	1,672,097	4.9	21.1	41.5	31.2	1.3
Owner-Occupied Units by Geography	955,617	2.2	17.5	44.6	35.3	0.4
Occupied Rental Units by Geography	623,521	9.0	26.5	36.6	25.3	2.6
Vacant Units by Geography	92,959	5.4	22.3	41.8	28.9	1.6
Businesses by Geography	592,030	4.8	18.3	39.4	36.3	1.2
Farms by Geography	11,266	3.3	18.3	46.2	31.6	0.5
Family Distribution by Income Level	996,775	20.2	17.8	21.7	40.2	0.0
Household Distribution by Income Level	1,579,138	23.0	16.9	18.7	41.4	0.0
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$82,149	Median Housing Value			\$521,707
Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA		\$116,853	Median Gross Rent			\$1,594
Median Family Income MSA - 45104 Tacoma-Lakewood, WA		\$88,892	Families Below Poverty Level			5.4%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody’s Analytics as of August 2024, Seattle-Bellevue-Everett's main economic drivers are manufacturing, high-tech, and logistics. Tacoma also benefits from a nearby military base. The metropolitan area is a global center for cloud computing and software development, having a highly trained and well-educated workforce, and a relatively high per capita income. However, weaknesses such as the tech industry’s exposure to discretionary spending and high business costs compared to emerging tech hubs limit growth. The top employers are Amazon, Boeing, Microsoft Corporation, University of Washington, and Providence Health & Services. Housing costs are very high in comparison to median family incomes and shortages in stock continue to be an issue for affordable homeownership.

Unemployment rates varied among each county and improved from 2021 to 2023. In King and Snohomish Counties the average rates of unemployment remained below those for Washington and the nation, while the rates in Pierce and Skagit Counties remained slightly above both comparators. See the following table for the AA’s unemployment rates.

Seattle-Tacoma CSA AA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
King County	4.2	3.0	3.4
Snohomish County	4.9	3.4	3.5
Pierce County	6.1	3.3	4.7
Skagit County	6.3	5.0	4.6
Washington State Average	5.2	4.1	4.1
National Average	5.3	3.6	3.6
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a very high level of competition for financial services in the AA. According to the June 30, 2024, FDIC Deposit Market Share Report, 48 institutions operate 753 branches in the AA. BB ranked 10th among these institutions with a market share of 1.9 percent. Large, national associations claim the top five spots with a combined market share of 69.7 percent.

Community Contact

Examiners contacted an individual from an economic development organization. The organization serves as an advocate for small businesses with a focus on retention and expansion to promote growth in the local area. The contact reported similar information to the Moody’s report when it came to major employers in the area and highlighted aerospace as a major contributor to the local economy. The contact also mentioned that they would like to see more CD participation from banks as the organization had previously received funding assistance from institutions, but that has ended. The contact emphasized a need for funding startups and noted that some clients avoid traditional funding sources because of the higher rates.

Credit and Community Development Needs and Opportunities

Considering information from community contacts, bank management and demographic data, flexible small business lending is a primary credit need in the AA. There are also opportunities to provide economic development and financial education to entrepreneurs and very small business startups. The high cost of AA housing and shortage of available stock also indicate a credit need for additional resources for affordable housing initiatives. Demographic and economic data support this conclusion.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SEATTLE-TACOMA CSA ASSESSMENT AREA

LENDING TEST

The Lending Test performance in the Seattle-Tacoma CSA AA is consistent with the state of Washington conclusions.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in the Seattle-Tacoma CSA are generally consistent with overall bank performance; see bank-wide section for discussion.

According to Peer Mortgage Data, the bank's ranking among other reporting institutions generally rose during the evaluation period while the relative market share remained stable. In 2021, BB ranked 42nd of 724 reporting lenders in the AA that made a total of 311,372 loans with a market share of 0.4 percent by number. In 2022, BB's rank rose to 26th of 672 reporting institutions that made a total of 142,347 loans with a market share of 0.8 percent and in 2023, the bank's ranking declined slightly to 32nd among 618 reporting institutions that made a total of 78,977 loans, which resulted in a market share of 0.7 percent. The bank's decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 10th among 212 reporting institutions that made 57,376 total loans with a market share of 1.9 percent. In 2022, the bank was ranked 13th out of 171 reporters that made a total of 58,518 loans with a market share of 0.5 percent and in 2023, BB ranked 14th of 166 reporters that made a total of 60,615 loans for an overall market share of 0.4 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. This conclusion is supported by good geographic distribution performance of home mortgage loans and geographic distribution performance of small business loans.

Home Mortgage Loans

The bank's performance of lending in low-income tracts was above the rates achieved by aggregate lenders and demographics throughout the review period. In 2021, the bank's performance of lending in moderate-income tracts was slightly below the same comparators, but not to an unreasonable

degree. In 2022 and 2023, the bank's performance improved and exceeded both measures, indicating good performance overall.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Seattle-Tacoma CSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.6	2.3	37	2.8	27,802	5.2
2022	2.2	2.3	45	3.7	4,895	1.0
2023	2.2	2.4	17	2.8	16,158	5.5
Moderate						
2021	17.6	17.3	200	14.9	70,816	13.3
2022	17.5	17.6	249	20.3	74,993	15.5
2023	17.5	18.8	136	22.1	46,777	15.9
Middle						
2021	46.4	46.8	628	46.9	203,889	38.2
2022	44.6	45.3	503	41.0	178,258	36.8
2023	44.6	45.9	298	48.4	131,353	44.7
Upper						
2021	33.5	33.6	471	35.2	230,924	43.2
2022	35.3	34.4	425	34.6	221,996	45.9
2023	35.3	32.6	164	26.6	99,386	33.8
Not Available						
2021	0.0	0.0	2	0.1	939	0.2
2022	0.4	0.4	5	0.4	3,701	0.8
2023	0.4	0.4	1	0.2	74	0.0
Totals						
2021	100.0	100.0	1,338	100.0	534,370	100.0
2022	100.0	100.0	1,227	100.0	483,841	100.0
2023	100.0	100.0	616	100.0	293,747	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

Lending in low-income CTs was strong and exceeded demographic data throughout the evaluation period and was above peer data for 2022 and 2023. Lending in moderate-income tracts was below peer data in 2021 and 2022 and slightly below demographics for the same period. However, lending

in moderate tracts trended upward over the evaluation period and was above both the comparators in 2023, resulting in adequate performance.

Geographic Distribution of Small Business Loans						
Assessment Area: Seattle-Tacoma CSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	5.4	6.0	104	5.8	23,767	9.2
2022	4.8	5.1	61	8.4	14,310	9.7
2023	4.8	4.6	38	7.2	10,135	9.6
Moderate						
2021	18.2	20.0	284	15.8	37,804	14.7
2022	18.2	19.5	119	16.3	27,124	18.4
2023	18.3	18.2	116	22.1	20,906	19.9
Middle						
2021	39.3	40.3	777	43.3	116,902	45.3
2022	39.4	39.8	345	47.3	65,363	44.4
2023	39.4	39.7	225	42.8	43,568	41.5
Upper						
2021	36.4	33.5	626	34.9	78,281	30.4
2022	36.4	34.6	199	27.3	39,130	26.6
2023	36.3	36.5	142	27.0	29,804	28.4
Not Available						
2021	0.7	0.3	5	0.3	1,126	0.4
2022	1.2	1.0	5	0.7	1,352	0.9
2023	1.2	1.0	5	1.0	615	0.6
Totals						
2021	100.0	100.0	1,796	100.0	257,880	100.0
2022	100.0	100.0	729	100.0	147,279	100.0
2023	100.0	100.0	526	100.0	105,028	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of lending reflects adequate penetration among retail customers of different income levels and business customers of different revenue sizes. This conclusion is supported by good home mortgage and poor small business lending performance.

Home Mortgage Loans

The distribution of home mortgage lending reflects good penetration among LMI borrowers; see the following table. Lending to low-income borrowers was well above peer over the entire evaluation period. In 2021, lending to moderate-income borrowers was just below the rate reported by the aggregate; however, the bank's performance improved steadily and exceeded peer for the remaining two years in the evaluation.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Seattle-Tacoma CSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	21.2	4.7	95	7.1	10,641	2.0
2022	20.2	5.8	83	6.8	9,319	1.9
2023	20.2	4.8	43	7.0	5,400	1.8
Moderate						
2021	17.6	15.3	187	14.0	40,054	7.5
2022	17.8	15.2	195	15.9	34,305	7.1
2023	17.8	15.2	108	17.5	18,195	6.2
Middle						
2021	20.8	22.9	249	18.6	67,765	12.7
2022	21.7	24.3	245	20.0	63,855	13.2
2023	21.7	24.8	169	27.4	43,306	14.7
Upper						
2021	40.4	43.1	753	56.3	277,346	51.9
2022	40.2	43.2	671	54.7	295,418	61.1
2023	40.2	41.8	277	45.0	108,303	36.9
Not Available						
2021	0.0	14.1	54	4.0	138,563	25.9
2022	0.0	11.5	33	2.7	80,944	16.7
2023	0.0	13.5	19	3.1	118,543	40.4
Totals						
2021	100.0	100.0	1,338	100.0	534,370	100.0
2022	100.0	100.0	1,227	100.0	483,841	100.0
2023	100.0	100.0	616	100.0	293,747	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of small business lending reflects poor penetration to small business borrowers; see the following table. Lending to small businesses in 2021 was well above the aggregate. In 2022, aggregate performance increased slightly, but BB's performance declined to a level that was below peer. In 2023, the bank's performance declined again, but by a slight degree. Bank management notes that bank consolidations in the Skagit County portion of the AA resulted in personnel changes that decreased the number of lenders from six to four, which was a contributing factor in decreased origination volume.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Seattle-Tacoma CSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	89.8	48.9	1,134	63.1	79,409	30.8
2022	92.1	54.0	346	47.5	49,323	33.5
2023	92.1	56.5	238	45.2	24,773	23.6
>\$1,000,000						
2021	3.3	--	661	36.8	178,143	69.1
2022	2.5	--	382	52.4	97,931	66.5
2023	2.3	--	284	54.0	80,185	76.3
Revenue Not Available						
2021	6.9	--	1	0.1	328	0.1
2022	5.4	--	1	0.1	25	0.0
2023	5.5	--	4	0.8	70	0.1
Totals						
2021	100.0	100.0	1,796	100.0	257,880	100.0
2022	100.0	100.0	729	100.0	147,279	100.0
2023	100.0	100.0	526	100.0	105,028	100.0
<i>Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.</i>						

Community Development Loans

BB is a leader in making CD loans in the Seattle-Tacoma CSA AA; see the following table. CD lending in the AA decreased from the prior evaluation, where the bank originated 65 loans totaling \$232.0 million. However, 34 CD loans totaling \$65.2 million were PPP loans at the last evaluation. Without the PPP loans, the number of CD loans in the AA at this evaluation is consistent. Furthermore, the dollar volume at this evaluation is higher by more than 21.0 percent when not considering the PPP loans. BB demonstrates responsiveness to AA credit needs as most CD lending dollars were directed to affordable housing, an identified CD need.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	9	52,258	-	-	1	1,635	1	1,053	11	54,946
2022	5	23,146	1	8,000	-	-	-	-	6	31,146
2023	8	108,845	-	-	-	-	-	-	8	108,845
2024	2	11,464	-	-	-	-	-	-	2	11,464
Total	24	195,713	1	8,000	1	1,635	1	1,053	27	206,401
<i>Source: Bank Data</i>										

Examples of CD loan activity include the following:

- In 2022, the bank originated an \$8.0 million loan to a non-profit organization to fund the remodel and expansion of clinical facilities serving the LMI populations throughout Snohomish County.
- In 2023, the bank originated a \$14.5 million affordable housing loan for the construction of a multifamily property located in a low-income CT where all units are rent controlled targeting LMI seniors.

INVESTMENT TEST

Investment Test performance in the Seattle-Tacoma CSA AA is consistent with the state of Washington.

Investment and Grant Activity

BB has an excellent level of qualified CD investments and grants. Investment activity increased \$38.2 million compared to the prior evaluation. The prior evaluation had a total of \$26.7 million, as compared to this evaluation's total of \$64.9 million. BB's level of investments and grants in the Seattle-Tacoma CSA AA compare well to peer institutions. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Qualified Investments – Seattle-Tacoma CSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2021	1	4,000	1	10,000	-	-	-	-	2	14,000
2022	3	31,208	2	7,500	-	-	-	-	5	38,708
2023	2	5,194	-	-	-	-	-	-	2	5,194
2024	2	6,937	-	-	-	-	-	-	2	6,937
Subtotal	8	47,339	3	17,500	-	-	-	-	11	64,839
Qualified Grants & Donations	-	-	12	53	-	-	-	-	12	53
Total	8	47,339	15	17,553	-	-	-	-	23	64,892
<i>Source: Bank Data</i>										

The following are notable examples of the institution's CD investments and donations:

- In 2021, management invested in a \$10.0 million bond to finance affordable housing projects and to provide community services to the homeless community in King County through the County's Health through Housing Initiative.
- In 2021, management invested in a \$4.0 million LIHTC project providing 51 units of affordable housing to LMI populations in Skagit County.
- In 2022, management invested in a \$10.0 million bond to finance a housing project to LMI populations in Snohomish County.
- In 2024, management invested in 2 LIHTC projects totaling \$5.2 million to renovate 217 affordable housing units in King County.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs in the AA. Most of the investments are targeted towards affordable housing, which is a critical need in the AA. Additionally, the bank provided investments towards minority depository institutions and CDFIs, which work to serve underserved communities.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support community development initiatives, such as LIHTCs and certificates of deposits to minority depository institutions. Refer to the state of Washington's conclusions for detail.

SERVICE TEST

Service Test performance in the Seattle-Tacoma CSA AA is consistent with the state of Washington's conclusions.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution's AA. The institution operates 24 full-service branches, 22 ATMs, and 4 LPOs in the AA. A total of 4, or 16.7 percent, of the institution's branches are in low-income tracts, which exceeds the 6.8 percent of branches operated in low-income geographies by other institutions in the AA. A total of 6, or 25.0 percent, of the institution's branches are in moderate-income tracts, which is slightly above the 23.4 percentage of branches other institutions that operate in moderate-income geographies in the AA. Regarding the other branches, 11 branches are in middle-income tracts and 3 branches are located in upper-income tracts. Mapping of branch locations demonstrated a consistent distribution of branches throughout the more populous regions in the geographically large four-county AA, improving accessibility for LMI individuals. Mapping also indicated a general proximity to LMI geographies, except a few moderate-income tracts in the northeast corner of the AA. Refer to the bank-wide section for more information of alternative delivery systems, which supplement accessibility of delivery systems.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The institution did not open any branches in the AA during the review period, but it did close two branches with one branch in a middle-income tract and the other branch in an upper-income tract. The proximity of the branch closures to other branch locations still in operation had a nominal impact to the LMI geographies and individuals in the AA.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the Seattle-Tacoma CSA AA, particularly LMI geographies and/or individuals. Refer to the state of Washington rated area and bank-wide discussion for additional details.

Community Development Services

BB is a leader in providing CD services to the Seattle-Tacoma CSA. Employees provided a total of 4,117 service hours to 190 different CD organizations. Performance increased from the prior evaluation, where bank employees provided a total of 2,132 service hours. Service hours more than doubled from the prior evaluation, demonstrating management's support for their employees in the provision of services. Additionally, BB's level of service hours provided in the AA compares favorably to peer institutions. Refer to the following table for the AA's CD service activities.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	113	281	98	-	492
2022	217	700	221	-	1,138
2023	155	966	247	-	1,368
2024	65	935	119	-	1,119
Total	550	2,882	685	-	4,117
<i>Source: Bank Data</i>					

The following are examples of services provided to the AA by BB employees:

- In 2021, bank employees provided 86 hours of service to the board of an organization that promotes start-ups and supports small businesses by providing technical assistance on financial matters.
- In 2023, an employee of the bank provided 95 hours of service to the board of an organization supporting activities essential to the capacity of LMI individuals or geographies to utilize credit or to sustain economic development, such as job training programs that enable LMI individuals to work.
- In 2024, a bank employee provided over 65 hours of service to the board of an organization that works with communities to develop and teach financial education or literacy curricula for LMI individuals or establishing school savings programs.

WENATCHEE MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WENATCHEE MSA ASSESSMENT AREA

The AA is in the north-central central portion of Washington and consists of all 23 CTs in Chelan County and all 9 CTs in Douglas County, which together form the Wenatchee MSA. No changes were made to this AA since the previous evaluation.

Economic and Demographic Data

According to 2020 U.S. Census Data, the AA contained 0 low-, 5 moderate-, 20 middle- and 7 upper-income CTs. The following table provides key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Wenatchee MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	15.6	62.5	21.9	0.0
Population by Geography	122,012	0.0	16.4	60.6	23.0	0.0
Housing Units by Geography	55,427	0.0	15.6	61.3	23.1	0.0
Owner-Occupied Units by Geography	29,162	0.0	12.1	60.8	27.2	0.0
Occupied Rental Units by Geography	15,656	0.0	22.5	57.9	19.7	0.0
Vacant Units by Geography	10,609	0.0	15.3	67.5	17.2	0.0
Businesses by Geography	14,588	0.0	17.9	56.9	25.2	0.0
Farms by Geography	1,200	0.0	14.6	63.7	21.8	0.0
Family Distribution by Income Level	30,969	18.5	19.0	21.1	41.5	0.0
Household Distribution by Income Level	44,818	21.5	17.8	19.9	40.8	0.0
Median Family Income MSA - 48300 Wenatchee, WA MSA		\$72,924	Median Housing Value			\$314,185
			Median Gross Rent			\$937
			Families Below Poverty Level			7.7%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody’s Analytics, the AA economy is primarily driven by agriculture and tourism. The volatility in these sectors doesn’t provide a great deal of stability. The AA is one of the 10 most agriculture dependent in the U.S., and is also dependent on tourism from the larger, surrounding metro areas where economies are slowing down. The housing market has been hindered by low affordability and higher mortgage interest rates, which presents an obstacle for those trying to

service mortgage debt. Stemilt Growers Inc., Confluence Health, Crunch Pak, McDougall and Sons Inc. and Alcoa comprise the largest employers in the area.

Unemployment rates for each county generally improved throughout the evaluation period and trended slightly above the rates for Washington and the rest of the nation. See the following table for the AA's unemployment rates.

Wenatchee WA AA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Chelan County	5.4	4.6	4.3
Douglas County	5.6	5.1	4.7
Washington State Average	5.2	4.1	4.1
National Average	5.3	3.6	3.6
Source: Bureau of Labor Statistics			

Competition

There is a moderate level of competition for financial services in the AA. According to the June 30, 2024, FDIC Deposit Market Share Report, 11 institutions operate 30 branches in the AA. BB ranked 4th among these institutions with a market share of 7.5 percent. The top three institutions consist of large, regional banks and a national association that have a combined market share of 61.9 percent.

Credit and Community Development Needs and Opportunities

Support for affordable housing is a primary credit need in the AA. This conclusion is based on economic and demographic data and information received from bank management.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WENATCHEE MSA ASSESSMENT AREA

LENDING TEST

The Lending Test performance is below the state of Washington's conclusions, but it is still satisfactory overall.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in the Wenatchee MSA are generally consistent with overall bank performance; see bank-wide section for discussion.

According to Peer Mortgage Data, the bank's ranking and relative market share among other reporting institutions generally increased each year of the evaluation period. In 2021, BB ranked 6th of 308 of the reporting institutions in the AA that made a total of 7,620 loans with a market share of

4.1 percent by number. In 2022, BB's rank rose to 2nd of 265 reporting institutions that made a total of 4,001 loans with a market share of 5.1 percent and in 2023, the bank's ranking remained at 2nd among 216 reporting institutions that made a total of 2,322 loans, which resulted in a market share of 8.5 percent. The bank's decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 11th among 56 reporting institutions that made 1,485 total loans with a market share of 4.2 percent. In 2022, the bank was ranked 12th out of 57 reporters that made a total of 1,428 loans with a market share of 1.7 percent and in 2023, BB ranked 15th out of 44 reporters that made a total of 1,283 loans for an overall market share of 0.7 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. This conclusion is supported by adequate geographic distribution performance of home mortgage loans and excellent geographic distribution performance of small business loans. The Wenatchee AA does not have any low-income CTs; therefore, the analysis of geographic distribution performance is limited to BB's activities in moderate-income tracts.

Home Mortgage Loans

The geographic distribution of loans reflects adequate penetration throughout the AA. In 2021, BB's performance in moderate-income CTs mirrored peer data and exceeded demographics. In 2022, the bank's performance was below both comparators and was due in part to the bank's lending production in a large tract in the eastern portion of the AA that was formerly designated as middle-income and which was changed to a moderate-income geography. In 2023, the bank developed a strategy to increase lending in moderate-income communities by expanding calling efforts, engaging with non-profit housing providers and implementing home buyer education classes conducted by the bank's mortgage team. These measures resulted in a significant improvement in 2023, where the bank's performance more than doubled and exceeded peer and demographics by a wide margin. Considering all factors, the bank's overall performance is adequate.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Wenatchee MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	12.3	12.9	41	12.9	12,801	10.1
2022	12.1	12.2	15	7.2	6,799	7.0
2023	12.1	12.3	26	17.5	8,262	14.4
Middle						
2021	78.4	78.7	243	76.4	100,573	79.0
2022	60.8	60.6	128	61.8	53,052	54.6
2023	60.8	60.9	80	53.7	31,095	54.2
Upper						
2021	9.3	8.3	34	10.7	13,891	10.9
2022	27.2	27.3	64	30.9	37,299	38.4
2023	27.2	26.8	43	28.9	18,030	31.4
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	318	100.0	127,264	100.0
2022	100.0	100.0	207	100.0	97,150	100.0
2023	100.0	100.0	149	100.0	57,387	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

BB's performance of lending in moderate-income CTs is excellent. In 2021, the bank's rate of lending significantly exceeded the rates reported by the aggregate and was well above demographic data. A change in tract designation from middle-income to moderate-income in 2022 resulted in a slight decline in performance but was still relatively close to peer data. In 2023, the bank made efforts to improve lending in LMI geographies which included having personalized cash flow conversations with clients. The resulting performance was nearly double that for the previous year and well above peer and demographic comparators.

Geographic Distribution of Small Business Loans						
Assessment Area: Wenatchee MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	19.7	17.6	29	31.5	3,572	34.1
2022	17.9	16.6	6	13.6	1,046	8.7
2023	17.9	16.3	7	25.9	505	6.7
Middle						
2021	70.5	74.9	53	57.6	4,926	47.0
2022	57.1	59.0	30	68.2	8,605	71.6
2023	56.9	59.7	16	59.3	5,887	78.4
Upper						
2021	9.9	7.5	10	10.9	1,977	18.9
2022	24.9	24.4	8	18.2	2,370	19.7
2023	25.2	24.1	4	14.8	1,115	14.9
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	92	100.0	10,475	100.0
2022	100.0	100.0	44	100.0	12,021	100.0
2023	100.0	100.0	27	100.0	7,507	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of lending reflects adequate penetration among retail customers of different income levels and business customers of different revenue sizes. This conclusion is supported by adequate lending performance for both products.

Home Mortgage Loans

The distribution of home mortgage lending reflects adequate penetration among LMI borrowers; see the following table. Lending to low-income borrowers in 2021 and 2022, was below peer, but in

2022 BB's performance improved and mirrored that of reporting institutions. Lending to moderate-income borrowers was commensurate with other reporting lenders in 2021 and 2022. In 2023, BB's performance decreased to a rate below aggregate. Management identified challenges serving LMI borrowers in the AA in part, due to lack of affordable housing stock. In order to improve performance, BB responded by conducting 18 new homebuyer classes that included 241 participants.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Wenatchee MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	19.1	2.7	3	0.9	101	0.1
2022	18.5	3.5	1	0.5	160	0.2
2023	18.5	2.0	3	2.0	162	0.3
Moderate						
2021	19.1	10.0	29	9.1	4,290	3.4
2022	19.0	9.8	21	10.1	3,814	3.9
2023	19.0	7.3	6	4.0	985	1.7
Middle						
2021	22.3	21.2	68	21.4	17,762	14.0
2022	21.1	20.3	27	13.0	7,062	7.3
2023	21.1	18.9	16	10.7	2,888	5.0
Upper						
2021	39.6	53.2	210	66.0	90,294	71.0
2022	41.5	57.0	157	75.8	85,802	88.3
2023	41.5	59.8	120	80.5	50,295	87.6
Not Available						
2021	0.0	12.9	8	2.5	14,818	11.6
2022	0.0	9.3	1	0.5	312	0.3
2023	0.0	11.9	4	2.7	3,057	5.3
Totals						
2021	100.0	100.0	318	100.0	127,264	100.0
2022	100.0	100.0	207	100.0	97,150	100.0
2023	100.0	100.0	149	100.0	57,387	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of small business lending reflects adequate penetration to small business borrowers; see the following table. Lending to small businesses in 2021 was well above the aggregate. In 2022, BB's performance was comparable with aggregate, which had decreased significantly from the previous year. In 2023, the bank's performance declined by a large degree and was well below aggregate performance. Bank management noted that BB focused on cash flow conversations with customers and organic loan growth coupled with less emphasis on mass marketing of business loan products, which resulted in a lower volume of lending in 2023. BB's performance in prior years is indicative of adequate performance.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Wenatchee MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	87.7	44.2	63	68.5	3,810	36.4
2022	90.3	55.1	25	56.8	4,928	41.0
2023	90.6	55.4	9	33.3	1,006	13.4
>\$1,000,000						
2021	3.4	--	29	31.5	6,665	63.6
2022	2.5	--	19	43.2	7,093	59.0
2023	2.4	--	18	66.7	6,501	86.6
Revenue Not Available						
2021	9.0	--	0	0.0	0	0.0
2022	7.2	--	0	0.0	0	0.0
2023	7.1	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	92	100.0	10,475	100.0
2022	100.0	100.0	44	100.0	12,021	100.0
2023	100.0	100.0	27	100.0	7,507	100.0
<i>Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.</i>						

Community Development Loans

BB made an adequate level of CD loans during the evaluation period. In 2021, the bank originated one \$13.1 million loan for the construction of a multifamily property located in a middle-income CT, where a majority of the units are rent controlled for LMI individuals and families. This marks an increase from the previous evaluation where the AA did not benefit from any CD lending activity and demonstrates responsiveness to the need for affordable housing. This performance is

adequate given the overall weight of the area and that operations only include 2 of the bank's 63 branches in the state.

INVESTMENT TEST

Investment Test performance in the Wenatchee MSA AA is below the Washington rated area, though still adequate.

Investment and Grant Activity

BB has an adequate level of qualified CD investments and grants. Investment activity increased \$272,000 compared to the prior evaluation. The prior evaluation had a total of \$752,000, as compared to this evaluation's total of \$1.1 million. BB's level of investments and grants in the Wenatchee MSA AA are comparable to peer institutions. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2021	1	1,000	-	-	-	-	-	-	1	1,000
2022	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-
Subtotal	-	-	-	-	-	-	-	-	-	-
Qualified Grants & Donations	6	29	6	24	-	-	-	-	12	53
Total	7	1,029	6	24	-	-	-	-	13	1,053
<i>Source: Bank Data</i>										

The following is an example of BB's qualified CD investment in the AA.

- In 2021, management invested in a \$1.0 million LIHTC project providing funding 66 units of farmworker housing, in which all units will be designated for affordable housing in Chelan County.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs in the AA. Most of the investments are targeted towards affordable housing, which is a primary AA credit need. Additionally, the bank provided investments towards community services that target underserved communities.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support community development initiatives, such as a LIHTC. Refer to Washington conclusions for detail.

SERVICE TEST

Service Test performance in the Wenatchee AA is consistent with the state of Washington's conclusions.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The institution operates two full-service branches and two ATMs in the AA. No low-income geographies exist in the AA. Neither of the institution's 2 branches are in moderate-income tracts, which is below the performance at 17.9 percent of branches operated in moderate-income geographies by other institutions.

Mapping of branch locations demonstrates that the two branches, both located in middle-income tracts, are geographically close to three of the five moderate-income geographies in the AA. The other two moderate-income tracts are in the northeast sector of the two-county AA. Refer to the bank-wide section for discussion of alternative delivery systems, which provide added accessibility of the institution's delivery systems.

Changes in Branch Locations

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to LMI individuals, as the institution did not open or close any branches in the AA during the review period.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the Wenatchee MSA AA, particularly moderate-income geographies and/or LMI individuals. Refer to the Washington rated area and bank-wide discussion for detailed information.

Community Development Services

BB is a leader in providing CD services to the Wenatchee AA. Service hours consisted of 204 separate instances of service. Employees provided a total of 543 service hours to 29 different CD organizations during the review period. Performance increased exponentially from the prior evaluation, where bank employees provided 174 hours of service to the AA. The majority of hours supported CD services and affordable housing targeted to LMI families; see the following table.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	34	-	-	-	34
2022	69	2	31	-	102
2022	77	113	17	-	207
2024	48	152	-	-	200
Total	228	267	48	-	543
<i>Source: Bank Data</i>					

The following are examples of CD services provided by bank employees during the review period:

- In 2021, a bank employee provided 46 hours of service to the board of an organization that works with AA schools and communities to support LMI and underrepresented youth with literacy and financial education.
- In 2022, a bank employee provided 63 hours of service to the board of an organization that helps individuals and families experiencing poverty and homelessness with the housing and supportive services they to be part of a healthy community.
- In 2023, a bank employee provided 45 hours of services utilizing banking skills and expertise to an organization to provide local programs designed to offer immediate relief, short-term care, and long-term growth in the AA.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

Conclusions for the five Washington AAs reviewed using limited-scope examination procedures are summarized in the following table. Examiners drew conclusions regarding the bank's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons and demographic information. The conclusions inconsistent with the Washington rated area did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Kennewick-Richland-Walla Walla CSA	Consistent	Consistent	Consistent
Bellingham MSA	Consistent	Below	Consistent
Spokane-Spokane Valley MSA	Consistent	Below	Consistent
Washington Non-MSA	Consistent	Below	Consistent
Yakima MSA	Consistent	Consistent	Consistent

Facts and data supporting conclusions for each limited-scope AA follow, beginning with a summary of the institution's operations and activities. Geographic distribution and borrower profile tables by loan type are included in an appendix. Description of the limited-scope AAs, including changes to individual AAs, demographic data and market share information are also included in an appendix.

Kennewick-Richland-Walla Walla CSA

BB operates nine branches in the AA. The bank did not open any branches but it closed one branch in a middle-income tract during the evaluation period, which had a negligible impact to LMI geographies. The branch distribution is consistent with bank performance.

Activity	#	\$
Small Business Loans	898	143,523
Home Mortgage Loans	873	231,776
Small Farm Loans	-	-
Community Development Loans	6	32,409
Investments (New)	6	32,409
Investments (Prior Period)	5	4,997
Donations	1	19,616
CD Services	1,813	-
<i>Source: Bank Data</i>		

Bellingham MSA

BB operates five branches in the AA. The bank did not open or close any branches during the evaluation period. The branch distribution is consistent with bank performance.

Activity	#	\$
Small Business Loans	461	52,124
Home Mortgage Loans	565	215,018
Small Farm Loans	-	-
Community Development Loans	5	42,955
Investments (New)	1	281
Investments (Prior Period)	-	-
Donations	21	91
CD Services	534	-
<i>Source: Bank Data</i>		

Spokane-Spokane Valley MSA

BB operates nine branches in the AA. The bank did not open any branches during the evaluation period and closed five branches. Three branches were in moderate-income tracts in Stevens County, which the bank exited in June 2022. The remaining two branch closures were in Spokane County and were in middle-income geographies. The branch distribution is below overall bank performance.

Activity	#	\$
Small Business Loans	989	156,231
Home Mortgage Loans	1,183	299,272
Small Farm Loans	-	-
Community Development Loans	7	17,413
Investments (New)	6	17,251
Investments (Prior Period)	5	4,861
Donations	1	162
CD Services	1,825	-
<i>Source: Bank Data</i>		

Washington Non-MSA

BB operates eight branches in the AA. The bank did not open or close any branches during the evaluation period. The branch distribution is below overall bank performance.

Activity	#	\$
Small Business Loans	624	75,765
Home Mortgage Loans	413	130,452
Small Farm Loans		
Community Development Loans	3	37,500
Investments (New)	2	36,443
Investments (Prior Period)	2	2,360
Donations	1	1,057
CD Services	554	-
<i>Source: Bank Data</i>		

Yakima MSA

BB operates six branches in the AA. The bank did not open any branches during the evaluation period and closed one branch in a middle-income tract, which did not have an adverse effect on LMI individuals or geographies. The branch distribution is consistent with the overall bank performance.

Activity	#	\$
Small Business Loans	752	113,104
Home Mortgage Loans	417	100,883
Small Farm Loans	-	-
Community Development Loans	7	25,427
Investments (New)	10	5,662
Investments (Prior Period)	1	221
Donations	20	89
CD Services	1,075	-
<i>Source: Bank Data</i>		

CALIFORNIA

CRA RATING FOR CALIFORNIA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CALIFORNIA

The California rated area consists of seven AAs throughout central and southern California. Refer to the bank-wide Description of Assessment Areas for a detailed list. In February 2022, BB sold its only branch in the Santa Rosa-Petaluma MSA and exited the AA to consolidate operations with the Sacramento MSA. As a result, performance analysis for the Santa Rosa-Petaluma MSA is limited to 2021. No other changes occurred in the California AAs during the evaluation period.

SCOPE OF EVALUATION – CALIFORNIA

Based on lending activity, deposit volume and branch distribution, the Los Angeles-Long Beach CSA AA was reviewed using full-scope procedures and contributes the greatest weight to overall conclusions. The remaining AAs in California were reviewed using limited-scope procedures, with the San Diego-Chula Vista-Carlsbad MSA receiving the greatest weight to overall conclusions, followed in decreasing weight by the Sacramento-Roseville CSA, Redding-Red Bluff CSA, California Non-MSA, Chico MSA and Santa Rosa-Petaluma MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CALIFORNIA

LENDING TEST

BB is rated “High Satisfactory” in the Lending Test in California. Performance is consistent across all AAs.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in California are consistent with overall bank performance; see bank-wide section for discussion. Market share and relative market rank for products reviewed varies by AA; refer to individual analyses for detail.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AAs. Performance across all areas was generally consistent with this conclusion except for the San Diego-Chula Vista-Carlsbad and Redding-Red Bluff MSAs where performance was stronger. Performance in the Los Angeles-Long Beach CSA and Chico MSA were weaker than the overall conclusion, but it was still adequate.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. Performance across all areas was consistent with this conclusion except for the California Non-MSA and Santa Rosa-Petaluma MSA where performance was stronger.

Community Development Loans

BB is a leader in making CD loans in California. This is consistent with performance from the prior evaluation and across all AAs. The 89 CD loans made during the previous evaluation were consistent with the originations for the current evaluation; however, the dollar amount more than doubled from the \$445.4 million made previously. Performance in all AAs is consistent with this conclusion and the emphasis on lending to support affordable housing demonstrates responsiveness to an identified credit need.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Los Angeles-Long Beach CSA	21	210,904	4	5,086	1	1,294	-	-	26	217,284
California Non-MSA	1	250	2	523	-	-	1	6,098	4	6,871
Chico MSA	5	80,340	-	-	-	-	-	-	5	80,340
Redding-Red Bluff CSA	1	3,000	-	-	-	-	-	-	1	3,000
Sacramento-Roseville CSA	4	31,866	-	-	-	-	-	-	4	31,866
San Diego-Chula Vista-Carlsbad MSA	15	220,242	4	8,517	3	7,212	1	1,036	23	237,007
Santa Rosa-Petaluma MSA	4	84,601	-	-	-	-	-	-	4	84,601
Statewide Activities	23	304,401	-	-	-	-	-	-	23	304,401
Total	74	935,604	10	14,126	4	8,506	2	7,134	90	965,370
<i>Source: Bank Data</i>										

During the evaluation period, BB made 23 loans totaling \$304.4 million that benefited the larger statewide area. The following are notable CD loan examples:

- In 2022, the bank originated a \$23.2 million loan for the construction of a new housing project that provides 87 units of affordable housing for LMI individuals and families. The subject property includes 35 permanent supportive units reserved for homeless residents.
- In 2022, the bank originated a \$10.8 million loan for the construction of an affordable housing project that provides 38 units for seniors earning at/below 60.0 percent of the area median income.
- In 2023, the bank originated a \$16.7 million loan to construct a 60-unit multifamily complex with all units set aside for low-income households. Twenty-nine of the units are set aside for farmworker residents as mandated by the state of California.

INVESTMENT TEST

Banner Bank is rated “Outstanding” in the Investment Test for the state of California. The institution’s performance in the Los Angeles-Long Beach CSA AA, Chico MSA, Sacramento-Roseville CSA and San Diego-Chula-Vista-Carlsbad MSA AAs was consistent with this conclusion. Performance in the California Non-MSA, Redding-Red Bluff CSA, and Santa Rosa-Petaluma MSA AAs was below the rated area conclusion, though still adequate.

Investment and Grant Activity

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. BB reported 238 qualified investments and donations that total approximately \$130.4 million in the state. By dollar, this level is an increase from the prior evaluation when the institution’s qualified investments and donations totaled approximately \$35.5 million. The bank held no prior period investments and reported approximately \$531,000 in grants and donations.

The current dollar amount of investments and donations in the state of California is 36.0 percent of the institution’s total qualified CD investments and donations for all the rated areas combined. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Community Development Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Los Angeles-Long Beach CSA	5	26,000	6	22,420	-	-	1	250	12	48,670
California Non-MSA	1	4,000	1	50					2	4,050
Chico MSA	3	9,000	-	-	-	-	-	-	3	9,000
Redding-Red Bluff CSA	1	1,000	-	-	-	-	-	-	1	1,000
Sacramento-Roseville CSA	5	21,237	-	-	-	-	-	-	5	21,237
San Diego-Chula Vista-Carlsbad MSA	5	20,902	2	15,000	-	-	-	-	7	35,902
Santa Rosa-Petaluma MSA	2	5,030	-	-	-	-	-	-	2	5,030
Statewide Activities	1	4,000	4	960	-	-	-	-	5	4,960
Subtotal	23	91,169	13	38,430	-	-	1	250	37	129,849
Grants/Donations	78	207	82	205	41	119	-	-	201	531
Total	101	91,376	95	38,635	41	119	1	250	238	130,380
Source: Bank Data										

The preceding table notes five separate investments totaling \$4.9 million made throughout the state. Examples include two investments in minority owned financial institutions that primarily lend or facilitate lending to promote CD. These investments totaled \$500,000 and provided capital that helps the institutions increase accessibility to financial products and services to underserved California consumers and businesses.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs. The institution's emphasis on affordable housing investments in the state of California is responsive to the need to provide more affordable housing resources to LMI individuals and families in the state.

Community Development Initiatives

The institution makes occasional use of innovative and/or complex investments to support CD initiatives. BB's qualified investments are useful and help promote CD, some investments are considered innovative and complex as certain new investments and those held by the institution during the review period are LIHTC and private equity investments.

SERVICE TEST

BB's Service Test performance in California is rated "Outstanding." Performance in all California AAs is consistent with this conclusion, except for the Santa Rosa-Petaluma MSA AA, but still not unreasonable given its single branch presence.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the institution's AAs in California. The institution operates 30 full-service branches and 22 ATMs in the AAs. The institution also operates three LPOs that are in California but are outside the delineated AAs. Alternative delivery systems available in California are consistent with the institution overall; refer to the bank-wide section for more information. Branch distribution varies by AA; refer to the specific AA analysis for further details.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The institution did not open any branches in the California AAs during the review period, but did close a branch in a middle-income tract. Refer to specific AA analysis for details on the impact of branch changes on LMI geographies and to LMI individuals.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the seven California AAs, particularly LMI geographies and/or LMI individuals. Refer to the bank-wide discussion for supplemental details.

Community Development Services

BB is a leader in providing CD services in California. Employees provided a total of 4,153 service hours to 188 different CD organizations throughout the AAs. CD service levels more than doubled from the prior evaluation, where employees provided a total of 1,962 hours of service. The majority of service hours are related to the provision of community services, an identified CD need in most of the California AAs. Service hours were provided in all AAs, except for the Santa Rosa-Petaluma MSA AA, which was added as an AA partway through the previous evaluation. The bank's physical presence in the Santa Rosa-Petaluma MSA AA consists of a single branch location; therefore, the lack of service hours is not unreasonable.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Los Angeles-Long Beach CSA	81	823	101	-	1,005
California Non-MSA	19	195	20	-	234
Chico MSA	154	10	40	-	204
Redding-Red Bluff CSA	10	165	73	-	248
Sacramento-Roseville CSA	74	509	253	-	836
San Diego-Chula Vista-Carlsbad MSA	72	968	349	-	1,389
Santa Rosa-Petaluma MSA	-	-	-	-	-
Statewide Activities	25	212	-	-	237
Total	435	2,882	836	-	4,153
<i>Source: Bank Data</i>					

As shown in the preceding table, 237 service hours were provided to the statewide area. Bank employees promoted community services in a variety of ways to serve the LMI communities such as teaching financial education or literacy curriculum to LMI individuals or establishing school savings programs.

LOS ANGELES-LONG BEACH CSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN LOS ANGELES- LONG BEACH CSA ASSESSMENT AREA

The AA is in southwestern California and consists of:

- All 2,498 CTs of Los Angeles County that form the Los Angeles-Long Beach-Glendale MD; and,
- All 518 CTs of Riverside County and all 466 CTs of San Bernardino County, which together form the Riverside-San Bernardino-Ontario MSA.

No changes were made to this AA since the previous evaluation.

Economic and Demographic Data

According to 2020 U.S. Census Data, the AA contained 207 low-, 976 moderate-, 1,073 middle-, 1,136 upper-income CTs and 90 tracts with no income designation. The following table provides key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Los Angeles Long Beach CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,482	5.9	28.0	30.8	32.6	2.6
Population by Geography	14,613,848	5.2	27.9	32.3	33.3	1.3
Housing Units by Geography	5,126,232	5.0	26.0	31.1	36.6	1.3
Owner-Occupied Units by Geography	2,416,505	1.8	18.1	33.4	46.2	0.5
Occupied Rental Units by Geography	2,292,502	8.5	34.5	28.8	26.1	2.0
Vacant Units by Geography	417,225	4.9	25.3	29.6	37.8	2.4
Businesses by Geography	1,946,128	3.6	19.2	27.7	46.9	2.6
Farms by Geography	22,012	2.8	18.5	31.1	46.1	1.5
Family Distribution by Income Level	3,240,651	23.2	16.8	18.0	41.9	0.0
Household Distribution by Income Level	4,709,007	25.5	15.2	16.8	42.5	0.0
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$80,317	Median Housing Value			\$581,856
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$76,686	Median Gross Rent			\$1,563
			Families Below Poverty Level			10.5%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody’s Analytics, the economy is fueled by tourism and entertainment, logistics and a strong healthcare base. The AA is a hub for entertainment and is trying to climb out of setbacks from the pandemic, as well as a writer’s strike that left the industry’s pipeline with insufficient content for production. Housing construction remains subdued and demographic data illustrates a high poverty rate and great disparity between the high cost of housing and median family income levels. Housing is not affordable in this AA. The Cedars-Sinai Medical Center, Los Angeles International Airport, University of California Los Angeles, VXi Global Solutions and the Walt Disney Company are among the top employers in the AA.

Unemployment rates for each county generally improved throughout the evaluation period and were generally similar to the rates for California; however, the rates in the AA trended higher than the overall rates for the nation. The following table includes the AA’s unemployment rates.

Los Angeles-Long Beach CSA CA AA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Los Angeles County	9.0	5.0	5.0
Riverside County	7.3	4.2	4.8
San Bernadino County	7.4	4.2	4.7
California State Average	7.3	4.3	4.8
National Average	5.3	3.6	3.6
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a high level of competition for financial services in the AA. According to the June 30, 2024, FDIC Deposit Market Share Report, 101 institutions operate 1,885 branches in the AA. BB ranked 42nd among these institutions with a market share of 0.1 percent. The top three institutions consist of national associations that have a combined market share of 49.8 percent.

Community Contact

Examiners conducted a community contact with an individual from a housing service agency that provides education, advocacy and solutions for expanding affordable housing for LMI individuals and families. The contact stated that area incomes have not kept pace with the rising cost of housing and obtaining affordable housing is an ongoing challenge, with waiting lists for housing assistance continuing to grow. The contact also noted that the organization actively works with financial institutions to assist residents that remain unbanked due to a series of social and economic factors. Examiners also reviewed an existing community contact that was conducted with a representative from a CD entity that uses private and public investments to fund economic development projects and support affordable housing initiatives. The contact stated that the area is experiencing high construction, labor, and permitting costs. These factors also impact small business owners that have been historically well capitalized. Small businesses have an increased need for capital which can be difficult to obtain through traditional lending products.

Credit and Community Development Needs and Opportunities

Based on information obtained from the community contacts, bank management and demographic and economic data, the provision of small dollar flexible lending to very small businesses and startups represents a primary CD credit need in the AA. There is also a significant need for affordable housing programs and services, including financial education, for LMI individuals.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LOS ANGELES-LONG BEACH CSA ASSESSMENT AREA

LENDING TEST

Lending Test performance in the Los Angeles-Long Beach CSA AA is consistent with the state of California.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in the Los Angeles-Long Beach MSA are generally consistent with overall bank performance; see bank-wide section for discussion.

According to Peer Mortgage Data, the bank's ranking among other reporting institutions generally rose during the evaluation period while the relative market share remained stable. In 2021, BB ranked 261st of the 974 reporting institutions that made a total of 769,135 loans with a market share of less than 0.1 percent by number. In 2022, BB's rank rose to 145th of 926 reporting institutions that made a total of 329,248 loans with a market share of 0.1 percent. In 2023, the bank's ranking declined slightly to 151st among 857 reporting institutions that made a total of 200,932 loans, which resulted in a market share of 0.1 percent. The bank's decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 31st among 348 reporting institutions that made 263,774 total loans with a market share of 0.1 percent. In 2022, the bank was ranked 55th out of 278 reporters that made a total of 293,092 loans with a market share of less than 0.1 percent. In 2023, BB ranked 52nd of 278 reporters that made a total of 289,748 loans for an overall market share of less than 0.1 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. This conclusion is supported by adequate home mortgage lending performance and good small business lending performance.

Home Mortgage Loans

The geographic distribution of loans reflects adequate penetration throughout the AA. In 2021, BB's performance in low-income CTs was slightly below aggregate data, but improved in 2022 and 2023, to the point that it exceeded both aggregate and demographic comparators. Performance in moderate-income CTs was comparable to aggregate data for 2021 and 2023. In 2022, BB's

performance was below aggregate, but not by a large degree. The bank's performance in moderate-income CTs was also generally aligned with demographic data throughout the evaluation period.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Los Angeles-Long Beach CSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.5	2.3	4	1.4	2,627	1.7
2022	1.8	2.0	8	2.2	10,868	5.6
2023	1.8	2.2	6	3.1	3,033	2.6
Moderate						
2021	18.5	16.8	49	16.9	35,023	23.1
2022	18.1	18.5	60	16.3	73,860	38.3
2023	18.1	18.4	36	18.8	84,032	70.9
Middle						
2021	30.3	29.8	73	25.2	40,262	26.5
2022	33.4	33.1	114	31.1	43,106	22.3
2023	33.4	31.9	67	34.9	11,349	9.6
Upper						
2021	48.6	51.0	164	56.6	74,032	48.7
2022	46.2	45.7	184	50.1	65,161	33.7
2023	46.2	46.7	82	42.7	20,037	16.9
Not Available						
2021	0.1	0.1	0	0.0	0	0.0
2022	0.5	0.7	1	0.3	100	0.1
2023	0.5	0.7	1	0.5	77	0.1
Totals						
2021	100.0	100.0	290	100.0	151,943	100.0
2022	100.0	100.0	367	100.0	193,095	100.0
2023	100.0	100.0	192	100.0	118,527	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The geographic distribution of loans reflects good penetration throughout the AA. In 2021, the bank's rate of lending in low-income CTs exceeded the rates reported by the aggregate and was above demographic data. In 2022, BB's performance decreased, but not a significant amount in relation to aggregate data. In 2023, the performance declined and was below demographic and

aggregate data. Lending in moderate-income CTs was strong and above both demographic and aggregate data throughout each year in the review period. The extent to which the bank's performance exceeded aggregate data is indicative of good performance.

Geographic Distribution of Small Business Loans						
Assessment Area: Los Angeles-Long Beach CSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	4.6	4.2	33	6.4	6,064	7.4
2022	3.6	3.2	4	2.5	2,039	5.4
2023	3.6	3.2	2	1.4	1,916	5.7
Moderate						
2021	20.5	20.8	129	24.9	17,773	21.6
2022	19.1	19.7	37	23.0	10,202	26.9
2023	19.2	19.4	34	24.1	9,910	29.5
Middle						
2021	24.1	25.1	167	32.2	38,164	46.5
2022	27.1	28.9	73	45.3	16,247	42.8
2023	27.7	29.0	61	43.3	11,321	33.6
Upper						
2021	49.0	48.7	187	36.0	20,016	24.4
2022	47.6	46.0	46	28.6	9,454	24.9
2023	46.9	46.4	44	31.2	10,500	31.2
Not Available						
2021	1.8	1.3	3	0.6	123	0.2
2022	2.7	2.2	1	0.6	25	0.1
2023	2.6	2.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	519	100.0	82,140	100.0
2022	100.0	100.0	161	100.0	37,967	100.0
2023	100.0	100.0	141	100.0	33,647	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the bank, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. This conclusion is supported by adequate home mortgage and poor small business lending performance.

Home Mortgage Loans

The distribution of home mortgage lending reflects adequate penetration among LMI borrowers; see the following table. In 2021, lending to low-income borrowers mirrored aggregate performance. In 2022, BB's performance registered a decline while aggregate performance improved. In 2023, the bank's performance remained stable and was below peer. Lending to moderate-income borrowers was slightly below other reporting lenders in 2021. In 2022, BB's performance registered a decline and was below the rate achieved by aggregate. The bank's performance recovered in 2023 to a point where it was on par with other reporting lenders. Management identified challenges serving LMI borrowers in the AA in part, because of challenges recruiting and retaining staff. Limited brand recognition and lack of affordable housing stock are also contribution factors for reaching LMI borrower. The high rate of poverty and disparity between median family incomes and housing values support this conclusion. To improve performance, the BB mortgage team conducted 27 home buyer education classes with 237 participants attending. Improvement of lending to moderate-income borrowers can be seen in 2023.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Los Angeles-Long Beach CSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	24.1	2.8	8	2.8	1,226	0.8
2022	23.2	4.0	4	1.1	385	0.2
2023	23.2	2.6	2	1.0	217	0.2
Moderate						
2021	16.5	7.8	17	5.9	3,672	2.4
2022	16.8	8.0	11	3.0	1,311	0.7
2023	16.8	5.7	10	5.2	1,050	0.9
Middle						
2021	17.4	17.2	43	14.8	9,684	6.4
2022	18.0	16.9	54	14.7	6,874	3.6
2023	18.0	14.6	26	13.5	3,542	3.0
Upper						
2021	42.1	52.4	204	70.3	61,811	40.7
2022	41.9	51.5	267	72.8	68,438	35.4
2023	41.9	48.4	147	76.6	35,636	30.1
Not Available						
2021	0.0	19.8	18	6.2	75,550	49.7
2022	0.0	19.5	31	8.4	116,086	60.1
2023	0.0	28.6	7	3.6	78,082	65.9
Totals						
2021	100.0	100.0	290	100.0	151,943	100.0
2022	100.0	100.0	367	100.0	193,095	100.0
2023	100.0	100.0	192	100.0	118,527	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of small business lending reflects poor penetration to small business borrowers; see the following table. Lending to small businesses in 2021 was well above the aggregate. In 2022, BB's performance reflected a significant decline and was below aggregate. In 2023, the bank's performance declined further and was well below aggregate performance. Bank management noted the bank has less brand recognition in this AA. BB also focused on cash flow conversations with customers and organic loan growth coupled with less emphasis on mass marketing of business loan

products which resulted in a lower volume of lending in 2023. The downward trend and the degree to which BB's performance was below the aggregate is indicative of poor performance.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Los Angeles-Long Beach CSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	90.6	45.3	297	57.2	25,591	31.2
2022	91.7	52.4	71	44.1	11,049	29.1
2023	92.4	54.2	55	39.0	7,992	23.8
>\$1,000,000						
2021	3.6	--	220	42.4	55,752	67.9
2022	3.0	--	90	55.9	26,918	70.9
2023	2.7	--	86	61.0	25,655	76.2
Revenue Not Available						
2021	5.9	--	2	0.4	797	1.0
2022	5.3	--	0	0.0	0	0.0
2023	4.9	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	519	100.0	82,140	100.0
2022	100.0	100.0	161	100.0	37,967	100.0
2023	100.0	100.0	141	100.0	33,647	100.0
<i>Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available.</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.</i>						

Community Development Loans

BB is a leader in making CD loans in the Los Angeles-Long Beach CSA. CD lending in the AA increased significantly by dollar volume from the prior evaluation, where BB originated 30 loans totaling \$151.8 million. The prior evaluation included 11 PPP loans totaling \$18.2 million. The focus on CD lending to support affordable housing demonstrates BB's responsiveness to AA credit needs identified by a community contact and demographic and economic data.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	5	24,136	-	-	1	1,294	-	-	6	25,430
2022	10	69,354	3	4,561	-	-	-	-	13	73,915
2023	3	62,565	-	-	-	-	-	-	3	62,565
2024	3	54,849	1	525	-	-	-	-	4	55,374
Total	21	210,904	4	5,086	1	1,294	-	-	26	217,284
<i>Source: Bank Data</i>										

Examples of CD loan activity include the following:

- In 2021, BB funded a \$16.8 million loan for the construction of a 53-unit multifamily supportive housing project for homeless and chronically homeless seniors with serious mental illness.
- In 2024, the bank originated a \$27.7 million loan to an affordable housing organization for the construction of a multifamily property located in a low-income CT where all the units will be rent controlled for LMI individuals and families.
- In 2024, the bank originated an \$8.5 million loan to rehabilitate and develop a 20-unit affordable housing project in the AA. The project will focus on the provision of housing for veterans earning between 15.0 and 60.0 percent of the area's median income.

INVESTMENT TEST

Investment Test performance in the Los Angeles-Long Beach CSA AA is consistent with the state of California's conclusions.

Investment and Grant Activity

BB has an excellent level of qualified CD investments and grants. Investment activity increased \$38.7 million compared to the prior evaluation. The prior evaluation had a total of \$10.1 million, as compared to this evaluation's total of \$48.8 million. BB's level of investments and grants in the Los Angeles-Long Beach CSA AA compares well to peer institutions. The following table shows a breakdown of qualified investments and donations activity by year and CD category.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period										
2021			4	12,170					4	12,170
2022	2	12,000	1	10,000					3	22,000
2023	1	3,500							1	3,500
2024	2	10,500	1	250			1	250	4	11,000
Subtotal	5	26,000	6	22,420			1	250	12	48,670
Qualified Grants & Donations	18	43	24	60	17	49			59	152
Total	23	26,043	30	22,480	17	49	1	250	71	48,822
<i>Source: Bank Data</i>										

The following are notable examples of BB's CD investments and donations:

- In 2022, the bank invested \$10.0 million as an unlimited GO tax-exempt bond for the Compton Unified School District. The funds are used to finance capital costs of improving district buildings. A substantial majority (80% to 85% of students qualify for the free and reduced lunch program).
- The bank invested \$10.0 million through a LIHTC for the rehabilitation of an affordable housing apartment complex in Riverside County with 78 subsidized and income restricted units.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs in the AA. Many of the investments are targeted towards affordable housing, which is a critical need in Southern California. Additionally, the bank provided investments towards minority depository institutions and CDFIs, which work to serve underserved communities.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives, such as LIHTC and certificates of deposits to minority depository institutions. Refer to California conclusions for detail.

SERVICE TEST

Service Test performance in the Los Angeles-Long Beach CSA AA is consistent with the state of California's conclusions.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The institution operates eight full-service branches and three ATMs in the AA. Two, or 25.0 percent, of the institution's branches are in moderate-income tracts, which compares

favorably to the 20.3 percent of branches operated in moderate-income geographies by other institutions in the AA.

Of the other six branches, three branches are in middle-income tracts and three branches are located in upper-income tracts. Mapping of branch locations indicated a general proximity to LMI geographies, except in the north and east regions of the geographically large three-county AA. Refer to the bank-wide section for additional information of alternative delivery systems.

Changes in Branch Locations

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals, as the institution did not open or close any branches in the AA since the previous performance evaluation.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the Los Angeles-Long Beach CSA AA, particularly LMI geographies and/or LMI individuals. Refer to the bank-wide discussion for additional details.

Community Development Services

BB is a leader in providing CD services to the Los Angeles-Long Beach CSA AA; see the following table. Employees provided a total of 1,005 hours of service to 64 different CD organizations in the AA. Performance increased from the prior evaluation, where employees provided 256 instances of services totaling 747 hours of service to the AA. The majority of service hours were provided in support of various community service initiatives, a CD need identified by the community contact. Additionally, BB's level of service hours provided in the AA compares favorably to peer institutions.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	-	64	43	-	107
2022	-	214	39	-	253
2022	2	324	6	-	332
2024	79	221	13	-	313
Total	81	823	101	-	1,005
<i>Source: Bank Data</i>					

The following are examples of CD services provided by bank employees:

- In 2021, bank employees provided over 85 hours of service by teaching financial education classes at a school located in the AA where a majority of the students are eligible for free and reduced-price lunch programs.
- In 2022, an employee promoted community services by contributing 55 hours conducting first-time homebuyer workshops for LMI individuals within the AA.

- In 2023, a bank employee provided 60 hours of board service to an organization that provides services and support for LMI, homeless, and at-risk individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

Conclusions for the seven California AAs reviewed using limited-scope examination procedures are summarized in the following table. Examiners drew conclusions regarding the bank's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons and demographic information. The conclusions inconsistent with the California rated area did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
California Non-MSA	Consistent	Below	Consistent
Chico MSA	Consistent	Consistent	Consistent
Redding-Red Bluff CSA	Consistent	Below	Consistent
Sacramento-Roseville CSA	Consistent	Consistent	Consistent
San Diego-Chula Vista-Carlsbad MSA	Consistent	Consistent	Consistent
Santa Rosa-Petaluma MSA	Consistent	Below	Below

Facts and data supporting conclusions for each limited-scope AA follow, beginning with a summary of the institution's operations and activities. Geographic distribution and borrower profile tables by loan type are included in an appendix. Description of the limited-scope AAs, including changes to individual AAs, demographic data and market share information are also included in an appendix.

California Non-MSA

BB operates three branches in the AA and did not open or close any branches during the evaluation period. The branch distribution is consistent with overall bank performance.

Activity	#	\$
Small Business Loans	85	5,986
Home Mortgage Loans	116	18,402
Small Farm Loans	-	-
Community Development Loans	4	6,871
Investments (New)	2	4,050
Investments (Prior Period)	-	-
Donations	16	31
CD Services	234	-
<i>Source: Bank Data</i>		

Chico MSA

BB operates one branch in the AA and did not open or close any branches during the evaluation period. The branch distribution is below overall bank performance.

Activity	#	\$
Small Business Loans	63	10,701
Home Mortgage Loans	68	73,806
Small Farm Loans	-	-
Community Development Loans	5	80,340
Investments (New)	3	9,000
Investments (Prior Period)	-	-
Donations	5	10
CD Services	204	-
<i>Source: Bank Data</i>		

Redding-Red Bluff CSA

BB operates three branches in the AA and did not open or close any branches during the evaluation period. The branch distribution is consistent below the overall bank performance.

Activity	#	\$
Small Business Loans	148	19,956
Home Mortgage Loans	155	37,226
Small Farm Loans	-	-
Community Development Loans	1	3,000
Investments (New)	1	1,000
Investments (Prior Period)	-	-
Donations	12	24
CD Services	248	-
<i>Source: Bank Data</i>		

Sacramento-Roseville CSA

BB operates seven branches in the AA and did not open or close any branches during the evaluation period. The branch distribution is below the overall bank performance.

Activity	#	\$
Small Business Loans	657	149,731
Home Mortgage Loans	268	124,432
Small Farm Loans	-	-
Community Development Loans	4	31,866
Investments (New)	5	21,237
Investments (Prior Period)	-	-
Donations	42	113
CD Services	836	-
<i>Source: Bank Data</i>		

San Diego-Chula Vista-Carlsbad MSA

BB operates eight branches in the AA and did not open or close any branches during the evaluation period. The branch distribution is consistent with the overall bank performance.

Activity	#	\$
Small Business Loans	765	125,045
Home Mortgage Loans	648	265,943
Small Farm Loans	-	-
Community Development Loans	23	237,007
Investments (New)	7	35,902
Investments (Prior Period)	-	-
Donations	37	114
CD Services	1,389	-
<i>Source: Bank Data</i>		

Santa Rosa-Petaluma MSA

BB no longer operates branches in the AA. The bank exited the AA with the closure of its sole branch in a middle-income tract in February 2022. The branch distribution is below the overall bank performance.

Activity	#	\$
Small Business Loans	6	487
Home Mortgage Loans	5	53,705
Small Farm Loans	-	-
Community Development Loans	4	84,601
Investments (New)	2	5,030
Investments (Prior Period)	-	-
Donations	3	3
CD Services	-	-
<i>Source: Bank Data</i>		

OREGON

CRA RATING FOR OREGON: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OREGON

The Oregon rated area consists of three AAs located in the western portion of the state at the southern part of the Willamette Valley and in other rural portions of Oregon. Refer to the bank-wide Description of Assessment Areas for a detailed list. BB did not make any changes to the AAs during the review period.

SCOPE OF EVALUATION – OREGON

Based on lending activity, deposit volume and branch distribution, the Oregon Non-MSA AA was reviewed using full-scope procedures and contributes the greatest weight to overall conclusions. The remaining AAs in Oregon were reviewed using limited-scope procedures with the Medford-Grants Pass CSA and the Eugene-Springfield CSA receiving equal weight in determining conclusions after the Oregon Non-MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON

LENDING TEST

BB's Lending Test performance in Oregon is rated "Low Satisfactory." Performance in the Oregon Non-MSA and Medford-Grants Pass CSA AAs were consistent with the overall conclusions. Performance in the Eugene-Springfield MSA AA is above the overall conclusion.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in Oregon are consistent with overall bank performance; see bank-wide section for discussion. Market share and relative market rank for products reviewed varies by AA; refer to individual analyses for detail.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AAs. Performance in the Oregon Non-MSA and Medford-Grants Pass CSA AAs were consistent with this conclusion, while performance in the Eugene-Springfield MSA AA is above the overall conclusion.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different revenue sizes. Performance in the Oregon Non-MSA AA is consistent with this conclusion.

Performance in the Eugene-Springfield MSA AA is above the overall conclusion and performance in the Medford-Grants Pass CSA AA was weaker, but still satisfactory.

Community Development Loans

BB made an adequate level of CD loans in Oregon. Performance in all AAs is consistent with this conclusion. Performance in Oregon has declined since the last evaluation where the bank made 66 loans totaling \$142.0 million and was noted as a leader in providing CD loans. PPP lending accounted for 9 loans totaling \$19 million; however, when PPP lending is not considered, the current performance is more than 57.0 percent lower by number and 13.0 percent by dollar amount. The majority of CD loans were dedicated to supporting affordable housing which demonstrates responsiveness to a primary credit need.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oregon Non-MSA	-	-	6	5,925	-	-	-	-	6	5,925
Eugene-Springfield MSA	3	9,880	1	4,500	1	2,000	-	-	5	16,380
Medford-Grants Pass CSA	2	16,974	3	8,335	-	-	1	1,200	6	26,509
Statewide Activities	6	43,875	-	-	-	-	1	15,115	7	58,990
Total	11	70,729	10	18,760	1	2,000	2	16,315	24	107,804
<i>Source: Bank Data</i>										

The following are examples of CD lending activities in Oregon:

- In 2021, the bank originated a \$8.0 million loan to a non-profit organization for the purchase of a medical facility, which provides medical, dental, pharmacy, and other health-related services for the underserved population.
- In 2024, the bank originated a \$1.2 million loan to a housing authority to revitalize a community in a disaster area affected by fire.

INVESTMENT TEST

BB is rated “Outstanding” in the Investment Test for the state of Oregon. The institution’s performance in the Oregon non-MSA AA and Eugene-Springfield MSA AA was consistent with this conclusion. Performance in the Medford-Grants Pass CSA AA was below the rated area conclusion though still adequate.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. BB reported 114 qualified investments and donations totaling approximately \$52.4 million in the state. By dollar, this level is an increase from the prior evaluation when the institution’s qualified investments and donations totaled approximately \$35.0 million. The total amount of new CRA-qualified investments

reported was approximately \$20.6 million. BB held approximately \$31.8 million in prior period investments and reported approximately \$636,675 in grants and donations in the state.

The current dollar amount of investments and donations in the state of Oregon is 14.5 percent of the institution's total qualified CD investments and donations for all the rated areas combined. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Community Development Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oregon Non-MSA	1	2,940	10	17,869	-	-	-	-	11	20,809
Eugene-Springfield MSA	3	14,026	1	3,062	-	-	-	-	4	17,088
Medford-Grants Pass CSA	3	8,000	2	6,105	-	-	-	-	5	14,105
State-wide Activities	-	-	3	21	-	-	-	-	3	21
Subtotal	7	24,966	16	27,057	-	-	-	-	23	52,023
Grants/Donations*	25	103	76	255	17	72	-	-	118	430
Total	32	25,069	92	27,312	17	72	-	-	141	52,453
Source: Bank Data										
*Total donations included 2 donations that benefited statewide; \$1,000 toward community services, and \$5,000 toward economic development purpose.										

The preceding table notes activities that provided benefit throughout Oregon. BB provided 3 donations totaling \$21,000 to community-based organizations that provide financial education and help Oregonians attain financial stability and build assets for LMI individuals and families.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs. The institution's emphasis on community service investments in the state of Oregon is responsive to a need to provide more community resources to address the needs of LMI families in the state.

Community Development Initiatives

The institution makes occasional use of innovative and/or complex investments to support CD initiatives. BB's qualified investments are useful and are predominantly comprised of mortgage-backed securities supporting affordable housing or investments in schools in the state that predominantly serve students from LMI families.

SERVICE TEST

Service Test performance in Oregon is rated "Outstanding." Performance in all Oregon AAs is consistent with this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to the institution's AAs in Oregon. The institution operates 27 full-service branches and 26 ATMs in the AAs. In Oregon, the available alternative delivery systems are consistent with the institution overall; refer to the bank-wide discussion for more information. Branch distribution varies by AA; refer to the separate AA analysis for additional details.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The institution did not open any branches in the Oregon AAs during the review period, but it did close four branches that were located in middle-income tracts. Refer to the bank-wide section for an overall summary and to the specific AAs for further details.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the three Oregon AAs, particularly LMI geographies and/or LMI individuals. Refer to the bank-wide discussion for supplemental details.

Community Development Services

BB is a leader in providing CD services in Oregon. BB's employees provided 4,792 service hours to 246 different CD organizations located throughout the AAs. CD service hours nearly doubled from the prior evaluation, where employees provided 2,593 hours. Service hours were provided in each Oregon AA but are particularly notable in the Medford-Grants Pass CSA AA due to BB's relatively small physical presence in the AA. See the following table for details.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Oregon Non-MSA	262	1,839	264	61	2,426
Eugene-Springfield MSA	169	728	213	-	1,110
Medford-Grants Pass CSA	278	878	4	-	1,160
State-wide Activities	80	16	-	-	96
Total	789	3,461	481	61	4,792
<i>Source: Bank Data</i>					

As shown in the above table, 96 service hours were provided to the regional Oregon area. These service hours represented employees teaching financial education at schools where a high percentage of students were under free or reduced lunch, senior center in a low-income area, and first-time homebuyer class to LMI individuals.

OREGON NON-MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE OREGON NON-MSA ASSESSMENT AREA

The AA is located throughout rural portions of Oregon and consists of the unincorporated counties of Baker, Coos, Douglas, Morrow, Umatilla and Union Counties. No changes were made to this AA since the previous evaluation.

Economic and Demographic Data

According to 2020 U.S. Census Data, the Oregon Non-MSA AA contained 0 low-, 12 moderate-, 60 middle- and 13 upper-income CTs. Two CTs have no income designation. The following table provides key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Oregon Non-MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	0.0	13.8	69.0	14.9	2.3
Population by Geography	311,255	0.0	13.3	73.2	13.6	0.0
Housing Units by Geography	138,241	0.0	14.9	71.8	13.3	0.0
Owner-Occupied Units by Geography	84,271	0.0	13.2	72.5	14.3	0.0
Occupied Rental Units by Geography	38,846	0.0	18.2	71.3	10.5	0.0
Vacant Units by Geography	15,124	0.0	15.8	69.1	15.2	0.0
Businesses by Geography	35,112	0.0	14.2	73.0	12.8	0.0
Farms by Geography	2,715	0.0	15.4	72.2	12.4	0.0
Family Distribution by Income Level	80,440	20.0	18.6	21.7	39.7	0.0
Household Distribution by Income Level	123,117	24.4	16.2	18.5	40.9	0.0
Median Family Income Non-MSAs - OR		\$63,625	Median Housing Value			\$204,597
			Median Gross Rent			\$829
			Families Below Poverty Level			10.1%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Unemployment rates for each county improved every year during the evaluation period and varied in comparison to the rates for each state and the nation. See the following table for details.

Oregon Non-MSA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Baker County	5.1	4.5	4.3
Coos County	6.2	5.0	4.5
Douglas County	5.8	4.9	4.7
Morrow County	4.6	3.9	3.4
Umatilla County	5.2	4.3	4.1
Union County	5.6	4.5	3.9
Oregon State Average	5.1	4.5	4.3
National Average	5.3	3.6	3.6
Source: Bureau of Labor Statistics			

Competition

There is a moderate level of competition for financial services in the AA. According to the June 30, 2024, FDIC Deposit Market Share Report, 11 institutions operate 64 branches in the AA. BB ranked 2nd among these institutions with a market share of 12.8 percent; however, the top spot is claimed by a large, regional bank that alone has 62.6 percent of the total market share.

Credit and Community Development Needs and Opportunities

Information obtained from bank management and economic and demographic information indicate supportive services for LMI individuals and families represent a primary CD need in the Oregon Non-MSA AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE OREGON NON-MSA ASSESSMENT AREA

LENDING TEST

Lending Test performance in the Oregon Non-MSA AA is consistent with state of Oregon's conclusions.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in the Oregon Non-MSA are generally consistent with overall bank performance; see the bank-wide section for discussion.

According to Peer Mortgage Data, the bank's ranking among other reporting institutions generally rose during the evaluation period while the relative market share increased. In 2021, BB ranked 7th of the 347 reporting institutions that made a total of 13,903 loans with a market share of 2.9 percent by number. In 2022, BB ranked 4th of 338 reporting institutions that made a total of 8,415 loans with a market share of 4.2 percent. In 2023, the bank's ranking was 5th among 271 reporting institutions that made a total of 5,726 loans, which resulted in an increased market share of 4.6

percent. The bank's decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 2nd among 83 reporting institutions that made 2,780 total loans with a market share of 13.8 percent. In 2022, the bank was ranked 6th out of 85 reporters that made a total of 3,011 loans with a market share of 5.9 percent. In 2023, BB ranked 7th of 66 reporters that made a total of 2,603 loans for an overall market share of 5.0 percent. Peer Small Business data shows the market in the AA was impacted by the influx of large, national associations that entered the market in 2022. The top three lenders claimed 51.1 percent of the total market share and nearly 40.0 percent of the total market share in 2023. Overall loan volumes in the AA also increased with the presence of large reporters, while BB registered a decline.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. This conclusion is supported by the adequate home mortgage loan performance and adequate small business loan performance. Since there are no low-income geographies in the AA, conclusions were based on BB's performance in moderate-income CTs.

Home Mortgage Loans

In 2021, the bank's performance was slightly below aggregate, but not to an unreasonable degree. In 2022 and 2023, BB's performance showed significant improvement and was comparable with aggregate for each year and just below demographic data.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Oregon Non-MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	5.5	5.0	15	3.7	3,562	4.1
2022	13.2	11.8	43	12.1	7,950	11.4
2023	13.2	12.1	34	12.9	5,646	11.6
Middle						
2021	81.4	80.9	341	83.2	68,665	79.7
2022	72.5	73.7	255	72.0	50,150	72.0
2023	72.5	73.2	179	67.8	33,702	69.1
Upper						
2021	13.1	14.1	54	13.2	13,879	16.1
2022	14.3	14.5	56	15.8	11,585	16.6
2023	14.3	14.7	51	19.3	9,409	19.3
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	410	100.0	86,106	100.0
2022	100.0	100.0	354	100.0	69,686	100.0
2023	100.0	100.0	264	100.0	48,757	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

In 2021, BB's performance was below aggregate and demographic data; however, in 2022, the bank's performance rose to a level that was above both comparators. In 2023, performance declined but was only slightly below the rate achieved by other reporters. Considering all factors, BB demonstrated adequate performance.

Geographic Distribution of Small Business Loans						
Assessment Area: Oregon Non-MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	4.8	4.9	13	2.5	543	1.2
2022	14.2	13.9	45	15.5	4,586	12.1
2023	14.2	12.5	23	10.7	2,212	11.3
Middle						
2021	81.9	83.0	438	85.7	39,210	87.6
2022	73.0	74.2	207	71.4	26,493	69.9
2023	73.0	74.6	162	75.3	13,403	68.3
Upper						
2021	13.3	12.0	60	11.7	5,012	11.2
2022	12.8	11.9	38	13.1	6,849	18.1
2023	12.8	12.8	30	14.0	4,002	20.4
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	511	100.0	44,765	100.0
2022	100.0	100.0	290	100.0	37,928	100.0
2023	100.0	100.0	215	100.0	19,617	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different revenue sizes. This conclusion is supported by adequate home mortgage and excellent small business lending performance.

Home Mortgage Loans

The distribution of home mortgage lending reflects adequate performance. In 2021, BB's performance was slightly below aggregate data. In 2022, the bank's performance was

commensurate with other reporters and in 2023, BB's performance was above aggregate. Lending to moderate-income borrowers was generally comparable to the rates reported by other lenders throughout the review period and just below demographic data. The bank's performance also trended upward each year. Overall, this performance is adequate.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Oregon Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	20.5	4.5	15	3.7	1,356	1.6
2022	20.0	5.4	18	5.1	2,012	2.9
2023	20.0	4.3	16	6.1	1,217	2.5
Moderate						
2021	17.8	16.6	65	15.9	10,382	12.1
2022	18.6	17.7	57	16.1	8,231	11.8
2023	18.6	17.1	45	17.0	5,438	11.2
Middle						
2021	20.9	23.3	106	25.9	19,208	22.3
2022	21.7	25.8	78	22.0	12,973	18.6
2023	21.7	24.6	65	24.6	10,801	22.2
Upper						
2021	40.8	36.2	208	50.7	47,037	54.6
2022	39.7	37.5	192	54.2	44,178	63.4
2023	39.7	38.6	134	50.8	30,115	61.8
Not Available						
2021	0.0	19.4	16	3.9	8,123	9.4
2022	0.0	13.5	9	2.5	2,292	3.3
2023	0.0	15.4	4	1.5	1,187	2.4
Totals						
2021	100.0	100.0	410	100.0	86,106	100.0
2022	100.0	100.0	354	100.0	69,686	100.0
2023	100.0	100.0	264	100.0	48,757	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of small business loans reflects excellent performance. BB's performance exceeded the rates achieved by reporting lenders by a wide margin each year of the evaluation period, which is indicative of excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Oregon Non-MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	87.5	53.2	386	75.5	18,535	41.4
2022	89.1	57.4	179	61.7	18,915	49.9
2023	90.0	57.3	132	61.4	7,143	36.4
>\$1,000,000						
2021	3.2	--	123	24.1	26,185	58.5
2022	2.7	--	109	37.6	18,733	49.4
2023	2.4	--	83	38.6	12,474	63.6
Revenue Not Available						
2021	9.4	--	2	0.4	45	0.1
2022	8.3	--	2	0.7	280	0.7
2023	7.6	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	511	100.0	44,765	100.0
2022	100.0	100.0	290	100.0	37,928	100.0
2023	100.0	100.0	215	100.0	19,617	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Community Development Loans

BB made an adequate level of CD loans in the Oregon Non-MSA AA. CD lending in the AA decreased by number and dollar volume from the prior evaluation where BB originated 18 loans totaling \$72.8 million. Four CD loans totaling \$9.1 million were PPP loans; however, performance is more than 57.0 percent lower by number and 90.0 percent lower by dollar volume when compared to the previous evaluation even with PPP lending removed from the calculation. The bank's focus on supporting community services demonstrates responsiveness to providing critical services to LMI individuals and families in the AA, which is comprised of outlying, rural areas. Demographic and economic data support this conclusion.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	-	-	-	-	-	-	-	-	-	-
2022	-	-	1	100	-	-	-	-	1	100
2023	-	-	3	290	-	-	-	-	3	290
2024	-	-	2	5,535	-	-	-	-	2	5,535
Total	-	-	6	5,925	-	-	-	-	6	5,925
<i>Source: Bank Data</i>										

Examples of CD loan activity include the following:

- In 2024, the bank originated a \$3.3 million loan to a non-profit organization that provides health care services for low-income and uninsured population. The funding allowed the organization to expand by purchasing a medical clinic.
- In 2023, BB renewed a \$175,000 line of credit for a non-profit organization. The organization provides for the basic needs of mentally ill and homeless individuals.

INVESTMENT TEST

Investment Test performance in the Oregon non-MSA AA is consistent with the state of Oregon's conclusions.

Investment and Grant Activity

BB has an excellent level of qualified CD investments and grants. Investment activity increased \$5.2 million compared to the prior evaluation. The prior evaluation had a total of \$15.8 million, as compared to this exam's total of \$21.0 million. The institution's level of investments and grants in the Oregon non-MSA AA compares well to peer institutions. The following table shows a breakdown of qualified investments and donations activity by year and CD category.

Qualified Investments – Oregon Non-MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	6	8,844	-	-	-	-	6	8,844
2021	-	-	-	-	-	-	-	-	-	-
2022	1	2,940	-	-	-	-	-	-	1	2,940
2023	-	-	3	7,585	-	-	-	-	3	7,585
2024	-	-	1	1,440	-	-	-	-	1	1,440
Subtotal	1	2,940	10	17,869	-	-	-	-	11	20,809
Qualified Grants & Donations	11	52	29	118	7	28	-	-	47	198
Total	12	2,992	39	17,987	7	28	-	-	58	21,007
<i>Source: Bank Data</i>										

The following are notable examples of the institution's CD investments and donations:

- In 2022, management invested in a \$2.9 million mortgage-backed security to finance an apartment complex providing 66 total units to the LMI populations in Coos County.
- In 2023, management invested in a \$4.5 million bond to build and improve school building in a school district where 95.0 percent of the students qualified for the free or reduced lunch program in Umatilla County.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs in the AA. Many of the investments are targeted towards affordable housing which is a need in several non-MSA counties in Oregon. Additionally, the bank provided investments towards affordable housing targeting LMI families, as well as investments in schools in the state that predominantly serve students from LMI families.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives. BB's qualified investments are valuable and are predominantly comprised of mortgage-backed securities supporting affordable housing or investments in schools in the state that predominantly serve students from LMI families.

SERVICE TEST

Service Test performance in the Oregon Non-MSA AA is consistent with state of Oregon's conclusions.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portion of the institution's AA. The institution operates 14 full-service branches and 15 ATMs in the AA. The AA does not include any low-income tracts. Only 1, or 7.1 percent, of the institution's branches are in a moderate-income tract, which is below the 15.5 percent of branches in the AA that are operated in moderate-income geographies by other institutions.

The other 13 branches are all located in middle-income tracts. Mapping of branch locations demonstrated an even distribution throughout the six-county AA with branch locations in close proximity to moderate-income geographies. Accessibility in the AA is enhanced by the institution's alternative delivery systems. Refer to the bank-wide section for additional context.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to LMI individuals. The institution did not open any branches in the AA since the previous performance evaluation, but did close two branches, both in middle-income tracts. The proximity of the branch closures to other branch locations still in operation in the AA had minimal impact to moderate-income geographies and to LMI individuals.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the Oregon Non-MSA AA, particularly moderate-income geographies and/or LMI individuals. Refer to the bank-wide discussion for further details.

Community Development Services

BB is a leader in providing CD services to the Oregon Non-MSA AA; see the following table for details. Employees provided a total of 2,426 hours to 116 different CD organizations in the AA. Performance more than doubled from the prior evaluation, where bank employees provided 1,057 hours. BB's level of service hours provided in the AA compares favorably to peer institutions.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	43	142	63	-	248
2022	101	495	52	55	703
2022	77	570	73	-	720
2024	41	632	76	6	755
Total	262	1,839	264	61	2,426
<i>Source: Bank Data</i>					

The following are examples of CD services provided by bank employees during the review period:

- In 2021, bank employees provided 39 hours of service by serving on the Board for an organization that expands and preserves affordable housing through flexible financing.

- From 2021 to 2024, bank employees provided 577 hours teaching financial education at school where the majority of students qualify for free or reduced-cost lunch programs.
- In 2023, a bank employee provided 36 hours of service on the executive and finance committees of an organization that provides various services to LMI individuals, including affordable housing and financial tools for establishing savings.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

Conclusions for the two Oregon AAs reviewed using limited-scope examination procedures are summarized in the following table. Examiners drew conclusions regarding the bank's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons and demographic information. The conclusions inconsistent with the Oregon rated area did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Eugene-Springfield MSA	Above	Consistent	Consistent
Medford-Grants Pass CSA	Consistent	Consistent	Consistent

Facts and data supporting conclusions for each limited-scope AA follow, beginning with a summary of the institution's operations and activities. Geographic distribution and borrower profile tables by loan type are included in an appendix. Description of the limited-scope AAs, including changes to individual AAs, demographic data and market share information are also included in an appendix.

Eugene-Springfield MSA

BB operates eight branches in the AA and did not open any branches but closed one branch in a middle-income tract during the evaluation period. The branch distribution is below the overall bank performance.

Activity	#	\$
Small Business Loans	463	49,789
Home Mortgage Loans	434	106,801
Small Farm Loans	-	-
Community Development Loans	5	16,380
Investments (New)	3	14,026
Investments (Prior Period)	1	3,062
Donations	29	103
CD Services	1,110	-
<i>Source: Bank Data</i>		

Medford-Grants Pass CSA

BB operates five branches in the AA and did not open any branches but closed one branch in a middle-income tract during the evaluation period. The branch distribution is consistent with overall bank performance.

Activity	#	\$
Small Business Loans	506	69,901
Home Mortgage Loans	432	244,676
Small Farm Loans	-	-
Community Development Loans	6	26,509
Investments (New)	5	14,105
Investments (Prior Period)	-	-
Donations	40	123
CD Services	1,160	-
<i>Source: Bank Data</i>		

PVH MULTISTATE MSA

CRA RATING FOR PVH MULTISTATE MSA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PVH MULTISTATE MSA ASSESSMENT AREA

The AA is in the northwest portion of Oregon and southwest portion of Washington. It consists of all 87 CTs in Clackamas, 197 CTs in Multnomah and all 134 CTs in Washington Counties in Oregon, and all 115 CTs in Clark County Washington. Together, these form a portion of the PVH Multistate MSA. No changes were made to this AA since the previous evaluation.

Economic and Demographic Data

According to 2020 U.S. Census Data, the PVH Multistate MSA contained 12 low-, 122 moderate-, 239 middle- and 156 upper-income CTs. Four CTs have no income designation. The following table provides key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: PVH Multistate MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	533	2.3	22.9	44.8	29.3	0.8
Population by Geography	2,340,512	2.3	23.5	45.9	28.1	0.2
Housing Units by Geography	940,912	2.4	23.1	46.0	28.3	0.2
Owner-Occupied Units by Geography	551,519	1.2	18.4	47.9	32.4	0.1
Occupied Rental Units by Geography	344,178	4.2	30.9	42.6	21.9	0.5
Vacant Units by Geography	45,215	2.8	22.2	47.4	27.3	0.3
Businesses by Geography	381,046	1.8	21.0	42.1	34.2	0.8
Farms by Geography	9,578	1.4	15.7	54.3	28.3	0.3
Family Distribution by Income Level	561,830	19.9	18.2	21.1	40.7	0.0
Household Distribution by Income Level	895,697	22.8	16.5	18.4	42.2	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$94,727	Median Housing Value			\$418,135
			Median Gross Rent			\$1,365
			Families Below Poverty Level			6.3%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody’s Analytics, the high-tech industry, logistics and manufacturing industries are key strengths in the AA economy. However, there have been significant layoffs at Intel and Nike, two of the largest employers in the AA. Providence Health Systems, Oregon Health & Science University and Legacy Health System are also among the largest local employers. The area is noted as having a high quality of living and a low poverty rate. Although housing prices are flat, they are expensive and remain substantially above the median income level making affordable housing challenging for individuals and families.

Unemployment rates for each county improved every year during the evaluation period and varied in comparison to the rates for each state and the nation. See the following table.

PVH Multistate MSA AA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Clark County (WA)	5.5	4.5	4.3
Clackamas County (OR)	4.8	3.6	3.4
Multnomah County (OR)	5.4	3.7	3.6
Washington County (OR)	4.4	3.3	3.2
Oregon State Average	5.2	3.9	3.7
Washington State Average	5.2	4.1	4.1
National Average	5.3	3.6	3.6
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a high level of competition for financial services in the AA. According to the June 30, 2024, FDIC Deposit Market Share Report, 29 institutions operate 385 branches in the AA. BB ranked 11th among these institutions with a market share of 0.9 percent. The top four institutions consist of large, national associations that have a combined market share of 72.1 percent.

Community Contact

Examiners conducted a community contact with a small business development organization. The contact noted the local area has good support for small businesses from local government sources, but that their clients experience funding gaps when trying to obtain capital for business expansion. The contact stated the transition can be difficult to address with conventional lending and some small business customers are lacking the financial expertise to obtain financing.

Credit and Community Development Needs and Opportunities

Considering the information from the community contacts and demographic and economic data, examiners determined that bridge lending to small businesses and for affordable housing projects represent the primary CD credit needs. There are also opportunities to provide financial education for small business owners and start-ups and services for LMI families and individuals.

SCOPE OF EVALUATION – PVH MULTISTATE MSA

Examiners conducted a full-scope review of the PVH Multistate MSA. Product weighting and rationale in the PVH Multistate MSA is consistent with the overall Scope of Evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE PVH MULTISTATE-MSA ASSESSMENT AREA

LENDING TEST

BB is rated “Low Satisfactory” in the Lending Test in the PVH Multistate AA.

Lending Activity

BB’s lending levels reflect good responsiveness to AA credit needs. Lending product trends in the PVH Multistate MSA are generally consistent with overall bank performance; see bank-wide section for discussion.

According to Peer Mortgage Data, the bank’s ranking among other reporting institutions rose each year in the evaluation period while the relative market share remained stable. In 2021, BB ranked 52nd of the 670 reporting institutions that made a total of 167,101 loans with a market share of 0.3 percent by number. In 2022, BB ranked 47th of 630 reporting institutions that made a total of 78,655 loans with a market share of 0.5 percent. In 2023, the bank’s ranking rose to 42nd of 552 reporting institutions that made a total of 47,792 loans, which resulted in a market share of 0.4 percent. The bank’s decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 13th among 194 reporting institutions with a market share of 0.8 percent. In 2022, the bank was ranked 17th out of 165 reporters with a market share of 0.3 percent. In 2023, BB ranked 18th among 154 reporters for an overall market share of 0.2 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. This conclusion is supported by adequate performance for both home mortgage and small business lending.

Home Mortgage Loans

BB’s lending performance in low-income CTs was on par with aggregate and demographic data throughout the evaluation period. In 2021, lending in moderate-income CTs lagged both comparators to a limited degree. In 2022, the bank’s performance declined to a rate that was below aggregate. Management attributed the decline in part to the bank’s top mortgage loan officer leaving the bank. Also, this officer had focused on first time homebuyer and financial education in the area. In response to the officer leaving, BB conducted outreach by implementing homebuyer education classes that were attended by 555 participants. BB’s performance improved the following year, to a

level that was more in alignment with aggregate and demographic comparators. Considering all factors, the bank's performance is adequate.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: PVH Multistate MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.8	0.8	5	0.8	772	0.3
2022	1.2	1.1	4	0.9	6,087	3.2
2023	1.2	1.1	2	0.9	522	0.5
Moderate						
2021	18.9	18.7	102	15.6	47,628	18.7
2022	18.4	18.9	57	13.2	24,843	13.1
2023	18.4	19.3	38	16.7	25,898	23.7
Middle						
2021	46.5	46.2	302	46.2	102,233	40.2
2022	47.9	47.9	195	45.2	67,728	35.8
2023	47.9	46.6	93	41.0	51,305	47.0
Upper						
2021	33.7	34.3	244	37.4	103,857	40.8
2022	32.4	32.1	174	40.4	90,211	47.7
2023	32.4	32.8	94	41.4	31,528	28.9
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.1	0.1	1	0.2	389	0.2
2023	0.1	0.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	653	100.0	254,489	100.0
2022	100.0	100.0	431	100.0	189,258	100.0
2023	100.0	100.0	227	100.0	109,253	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

In 2021, lending in low-income CTs was above demographic and aggregate data. In 2022 and 2023, the bank's performance declined when compared to aggregate data. However, demographic data suggests that opportunities for lending in these geographies are somewhat limited. In 2021, lending in moderate-income tracts was slightly above both demographic and aggregate date. In 2022 and 2023, the bank's performance declined slightly, but remained commensurate with both comparators, indicating adequate performance.

Geographic Distribution of Small Business Loans						
Assessment Area: PVH Multistate MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.6	2.8	22	4.4	5,002	5.5
2022	1.8	1.7	1	0.3	350	0.5
2023	1.8	1.6	1	0.4	340	0.6
Moderate						
2021	21.6	21.8	113	22.8	23,942	26.5
2022	20.9	21.7	58	19.5	17,046	22.7
2023	21.0	21.0	52	20.8	13,237	23.8
Middle						
2021	39.4	40.3	154	31.0	28,995	32.0
2022	42.2	42.8	131	44.0	32,605	43.5
2023	42.1	42.6	108	43.2	27,129	48.7
Upper						
2021	34.3	33.5	192	38.7	28,972	32.0
2022	34.2	33.1	102	34.2	22,928	30.6
2023	34.2	34.0	87	34.8	14,685	26.4
Not Available						
2021	2.1	1.6	15	3.0	3,585	4.0
2022	0.8	0.8	6	2.0	2,076	2.8
2023	0.8	0.8	2	0.8	301	0.5
Totals						
2021	100.0	100.0	496	100.0	90,496	100.0
2022	100.0	100.0	298	100.0	75,005	100.0
2023	100.0	100.0	250	100.0	55,692	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. This conclusion is supported by adequate home mortgage lending performance and poor small business lending performance.

Home Mortgage Loans

In 2021, BB's lending to low-income borrowers mirrored aggregate data. In 2022, the bank's performance was slightly below the performance of other reporters and improved in 2023 to a level that is comparable with aggregate. In 2021, lending to moderate-income borrowers was below aggregate. In 2022, the bank's lending registered a decline, widening the gap between the bank and aggregate performance. Management identified the bank's lagging performance and instituted home buyer education classes. The bank's mortgage team conducted 50 classes with 555 participants attending. In 2023, BB's performance of lending to moderate-income borrowers improved. Considering all of these factors, the bank's overall performance is adequate.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: PVH Multistate MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	21.1	5.5	36	5.5	5,789	2.3
2022	19.9	5.5	19	4.4	2,066	1.1
2023	19.9	4.2	11	4.8	1,342	1.2
Moderate						
2021	17.3	17.5	79	12.1	19,217	7.6
2022	18.2	16.7	39	9.0	7,341	3.9
2023	18.2	14.9	34	15.0	8,002	7.3
Middle						
2021	20.3	24.4	123	18.8	36,052	14.2
2022	21.1	24.1	91	21.1	19,018	10.0
2023	21.1	24.6	36	15.9	9,200	8.4
Upper						
2021	41.3	38.6	385	59.0	156,252	61.4
2022	40.7	42.4	259	60.1	104,995	55.5
2023	40.7	39.9	136	59.9	50,036	45.8
Not Available						
2021	0.0	14.0	30	4.6	37,179	14.6
2022	0.0	11.3	23	5.3	55,839	29.5
2023	0.0	16.3	10	4.4	40,672	37.2
Totals						
2021	100.0	100.0	653	100.0	254,489	100.0
2022	100.0	100.0	431	100.0	189,258	100.0
2023	100.0	100.0	227	100.0	109,253	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

In 2021, BB's rate of lending to small businesses surpassed the aggregate. However, in 2022, the bank's performance notably declined to a level that was well below aggregate. In 2023, performance declined slightly; however, aggregate performance trended upward during the same time. Management attributed declining performance to a shift in focus of having cash flow conversations with customers and organic loan growth with less emphasis on mass marketing of BB's business loan products. The downward trend and the degree to which BB's performance was below aggregate is indicative of poor performance.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: PVH Multistate MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	90.8	50.5	282	56.9	24,449	27.0
2022	92.1	54.9	119	39.9	25,793	34.4
2023	92.6	56.4	95	38.0	11,244	20.2
>\$1,000,000						
2021	3.1	--	213	42.9	65,762	72.7
2022	2.6	--	179	60.1	49,212	65.6
2023	2.3	--	153	61.2	44,396	79.7
Revenue Not Available						
2021	6.1	--	1	0.2	285	0.3
2022	5.4	--	0	0.0	0	0.0
2023	5.1	--	2	0.8	52	0.1
Totals						
2021	100.0	100.0	496	100.0	90,496	100.0
2022	100.0	100.0	298	100.0	75,005	100.0
2023	100.0	100.0	250	100.0	55,692	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Community Development Loans

BB is a leader in making CD loans in the PVH Multistate MSA. This is consistent with the bank's performance from the last evaluation where BB made 19 CD loans totaling \$72.9 million. The vast majority of CD lending dollars supported affordable housing, which represents the bank's responsiveness to a primary credit need in the AA.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	11	64,879	-	-	-	-	-	-	11	64,879
2022	4	46,201	1	100	-	-	-	-	5	46,301
2023	1	20,250	-	-	1	1,100	-	-	2	21,350
2024	2	33,800	1	250	-	-	-	-	3	34,050
Total	18	165,130	2	350	1	1,100	-	-	21	166,580
Source: Bank Data										

Examples of CD loan activity include the following:

- In 2003, the bank originated a \$1.1 million economic development loan under the Small Business Administration to rebuild a fast-food chain in a moderate-income tract that will create 8 new jobs.
- In 2023, the bank originated a \$20.3 million affordable housing project for the purchase of a multifamily property located in a middle-income CT where all the units will be rent controlled for LMI individuals and families.

INVESTMENT TEST

BB is rated “Outstanding” in the Investment Test for the PVH Multistate AA.

Investment and Grant Activity

The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. BB reported 37 qualified investments and donations that totaled approximately \$20.5 million in the AA. The bank held 4 prior period investments totaling \$18.3 million and reported approximately \$140,000 in grants and donations.

The current dollar amount of investments and donations in the PVH Multistate MSA AA is 5.7 percent of the bank’s total qualified CD investments and donations for all the rated areas combined. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	6,290	3	12,045	-	-	-	-	4	18,335
2021	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-
2024	1	2,000	-	-	-	-	-	-	1	2,000
Subtotal	2	8,290	3	12,045	-	-	-	-	5	20,335
Qualified Grants & Donations	12	65	17	67	3	8	-	-	32	140
Total	14	8,355	20	12,112	3	8	-	-	37	20,475
<i>Source: Bank Data</i>										

The following are notable examples of the bank's CD investments and donations:

- In 2022, BB invested in a \$10.0 million bond with a community service purpose supporting the acquisition and development of a low-income housing facility located in Cornelius, Oregon. The facility has a LIHTC agreement and 100.0 percent of the units have rent restrictions.
- In 2024, management invested \$2.0 million toward a LIHTC project providing 95 affordable housing units to LMI senior populations.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs in the AA. Many of the investments are targeted towards affordable housing, which is a significant need in the PVH Multistate MSA AA.

Community Development Initiatives

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. Some of BB's qualified investments are considered innovative and complex, as certain new investments and those held by the institution during the review period are LIHTCs and private equity investments.

SERVICE TEST

BB is rated "Outstanding" in the Service Test in the PVH Multistate MSA AA.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The bank operates seven full-service branches, six ATMs, and two LPOs in the AA. Only 1, or 14.3 percent, of the bank's branches is in a moderate-income tract, which is below the 30.1 percent of branches other institutions operate in moderate-income geographies.

Of the other six branches, two branches are in middle-income tracts and four branches are located in upper-income tracts. Mapping of branch locations indicated a centralized grouping in more populated geographies with no branch presence in outlying regions of the geographically large four-county AA. Accessibility in the AA is augmented by the bank's alternative delivery systems; refer to the bank-wide discussion for specific information.

Changes in Branch Locations

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. BB didn't open any branches in the AA since the previous performance evaluation, but did close two branches with one branch in a middle-income tract and the other branch in an upper-income tract

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the PVH Multistate MSA AA, particularly LMI geographies and/or LMI individuals. Refer to the bank-wide discussion for additional details.

Community Development Services

BB is a leader in providing CD services within the PVH Multistate MSA; see the following table. Employees provided a total of 1,208 service hours to 53 different CD organizations in the AA. Service hours increased significantly from the prior evaluation, where BB employees provided a total of 846 hours. The increase in service hours demonstrates management's efforts to improve performance in the AA during the review period. Additionally, BB's level of service hours provided in the AA compares favorably to peer institutions.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	16	24	35	-	75
2022	92	130	26	-	248
2023	156	316	24	-	496
2024	53	336	-	-	389
Total	317	806	85	-	1,208
<i>Source: Bank Data</i>					

The following are examples of CD services provided by bank employees:

- From 2021 to 2024, bank employees promoted community service by serving 490 hours on the Board and volunteer service hours for an organization that provides hands-on experiences to help students understand the economics of life such as banking, budgeting, analyzing and prioritizing tasks, and developing personal responsibility for self-management. These services were targeted to LMI students at various schools with high percentages of free or reduced lunch.
- From 2021 to 2024, two bank employees contributed a total of 197 hours serving on the Board of an affordable housing organization that provides technical assistance on financial matters for facilitating affordable housing construction and rehabilitation for first-time homebuyers.

IDAHO

CRA RATING FOR IDAHO: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IDAHO

The Idaho rated area consists of four AAs covering the western and central portion of the state. Refer to the bank-wide Description of Assessment Areas for a detailed list. BB did not add any AAs to the rated area during the review period, but did exit the Coeur d'Alene MSA with the sale of the bank's sole branch in Kootenai County in June 2022; thus, performance in the AA is limited to 2021 and the applicable portion of 2022. No other changes occurred to the Idaho AAs.

SCOPE OF EVALUATION – IDAHO

Based on lending activity, deposit volume and branch distribution, the Boise City MSA AA was reviewed using full-scope procedures and contributes the greatest weight to overall conclusions. The remaining AAs in Idaho were reviewed using limited-scope procedures, with the Idaho Non-MSA receiving the greatest consideration in determining overall conclusions followed in decreasing weight by the Coeur d'Alene MSA and the Twin Falls MSA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN IDAHO

LENDING TEST

Lending Test performance in Idaho is rated "High Satisfactory." Performance across all AAs is consistent with this conclusion.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in Idaho are consistent with overall bank performance; see bank-wide section for discussion. Market share and relative market rank for products reviewed varies by AA; refer to individual analyses for detail.

Geographic Distribution

BB's distribution of borrowers reflects good penetration throughout the AAs. Performance across all Idaho AAs is consistent with this conclusion.

Borrower Profile

BB's distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. Performance in the Boise City MSA and Coeur d'Alene MSA AAs was consistent

with this conclusion, while performance in the Idaho Non-MSA and Twin Falls MSA AAs was above the Idaho performance.

Community Development Loans

BB is a leader in making CD loans in Idaho. This is consistent with performance at the previous evaluation where the bank made 14 CD loans totaling \$40.9 million. The current dollar volume represents a 63.0 percent increase in comparison to the prior evaluation. Performance in the Boise City MSA and Twin Falls MSA is consistent with this conclusion. Performance in the Idaho Non-MSA was lower, though still satisfactory. No CD loans were made in the Coeur d’Alene MSA AA; however, the lack of CD lending is not unreasonable as BB had a limited presence in the AA and exited it during the review period. BB’s emphasis on affordable housing demonstrates responsiveness to a primary credit need identified throughout the AAs.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Boise City MSA	8	52,050	-	-	-	-	-	-	8	52,050
Coeur d’Alene MSA	-	-	-	-	-	-	-	-	-	-
Idaho Non-MSA	-	-	1	50	-	-	-	-	1	50
Twin Falls MSA	1	13,300	1	1,380	-	-	-	-	2	14,680
Total	9	65,350	2	1,430	-	-	-	-	11	66,780
<i>Source: Bank Data</i>										

INVESTMENT TEST

BB is rated “High Satisfactory” in the Investment Test for the state of Idaho. The institution’s performance in the Boise City MSA AA and Twin Falls MSA AA was consistent with this conclusion. Performance in the Coeur d’Alene MSA AA and Idaho non-MSA AA were below the rated area conclusion.

Investment and Grant Activity

BB made a significant level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The bank reported 35 qualified investments and donations that total approximately \$11.0 million in the state. By dollar, this level is an increase from the prior evaluation when the bank’s qualified investments and donations totaled approximately \$9.3 million. BB held 2 prior period investments totaling \$1.7 million and reported approximately \$182,000 in grants and donations.

The current dollar amount of investments and donations in the state of Idaho is 3.0 percent of the institution’s total qualified CD investments and donations for all the rated areas combined. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Community Development Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Boise City MSA	1	6,500	1	1,059	-	-	-	-	2	7,559
Coeur d'Alene MSA	-	-	-	-	-	-	-	-	-	-
Idaho Non-MSA	-	-	-	-	-	-	-	-	-	-
Twin Falls MSA	1	1,489	-	-	-	-	-	-	1	1,489
Statewide Activities	1	876	2	87	1	800	-	-	4	1,763
Subtotal	3	8,865	3	1,146	1	800			7	10,811
Grants/Donations	5	25	23	157	-	-	-	-	28	182
Total	8	8,890	26	1,303	1	800	-	-	35	10,993
<i>Source: Bank Data</i>										

An example of an activity that benefited the state of Idaho is a statewide activity noted in the preceding table, which includes a grant for \$62,456 to fund the provision of legal assistance for low-income individuals and vulnerable populations.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs. The bank's emphasis on affordable housing investments in the state of Idaho is responsive to a need to provide more affordable housing resources to LMI individuals and families in the state.

Community Development Initiatives

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. Some of BB's qualified investments are considered innovative and complex, as certain new investments and those held by the institution during the review period are LIHTCs and private equity investments.

SERVICE TEST

Service Test performance in Idaho is rated "Outstanding." Performance in the Boise City MSA and Idaho Non-MSA AAs is consistent with this conclusion. Performance in the Coeur d'Alene MSA AA and Twin Falls AA is below that of Idaho's overall conclusions.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the institution's AAs in Idaho. The institution operates eight full-service branches, eight ATMs, and one LPO in the AAs. Alternative delivery systems available in Idaho are consistent with the institution overall; refer to the bank-wide section for more information. Branch distribution varies by AA; refer to the specific AA analysis for further details.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The institution did not open any branches in the Idaho AAs during the review period, but did close a branch in a middle-income tract. Refer to specific AA analysis for details on the impact of branch changes on LMI geographies and to LMI individuals.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the four Idaho AAs, particularly LMI geographies and/or LMI individuals. Refer to the bank-wide discussion for supplemental details.

Community Development Services

BB is a leader in providing CD services in Idaho. Bank employees provided a total of 1,038 hours of service throughout Idaho AAs. Performance increased from the prior evaluation, where BB employees provided 563 service hours. BB's level of service hours provided to the rated area compares favorably to peer institutions. Service hours were provided in each Idaho AA.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Boise City MSA	78	338	111	-	527
Coeur d'Alene MSA	-	13	-	-	13
Idaho Non-MSA	12	233	151	-	396
Twin Falls MSA	-	102	-	-	102
Total	90	686	262	-	1,038
<i>Source: Bank Data</i>					

BOISE CITY MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BOISE CITY MSA ASSESSMENT AREA

The AA is in the northwestern portion of Idaho and consists of all 129 CTs in Ada County and all 54 CTs in Canyon County, which together form a portion of the Boise City MSA. There were no changes to this AA since the previous evaluation.

Economic and Demographic Data

According to 2020 U.S. Census Data, the Boise City MSA contained 4 low- 33 moderate-, 88 middle- and 57 upper-income CTs. One CT has no income designation. The following table provides key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Boise City MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	183	2.2	18.0	48.1	31.1	0.5
Population by Geography	726,072	2.3	18.0	49.0	30.5	0.3
Housing Units by Geography	265,439	2.1	18.7	48.9	30.0	0.4
Owner-Occupied Units by Geography	180,553	0.6	15.0	51.0	33.3	0.0
Occupied Rental Units by Geography	74,649	5.4	27.0	44.2	22.2	1.2
Vacant Units by Geography	10,237	4.1	21.8	44.6	29.2	0.4
Businesses by Geography	123,417	1.6	16.4	46.6	35.4	0.1
Farms by Geography	4,198	0.9	16.6	47.6	34.9	0.0
Family Distribution by Income Level	170,224	16.8	19.0	22.9	41.3	0.0
Household Distribution by Income Level	255,202	21.0	17.0	21.1	41.0	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$77,090	Median Housing Value			\$279,993
			Median Gross Rent			\$999
			Families Below Poverty Level			6.5%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to Moody’s, the economy in the AA is expanding and is driven by the high-tech industry, manufacturing and is attractive to retirees. Ties to the semiconductor sector also introduce a level of volatility due to the cyclical nature of the industry. According to the same source, housing prices are on the decline and may help boost affordability. Top employers include St. Luke’s Health System, Micron Technology, St. Alphonsus Regional Medical Center, Boise State University, and Walmart Inc.

Unemployment rates for each county generally improved during the evaluation period and were comparable to those for Idaho. Averages varied in comparison to the National averages. See the following table.

Boise City ID AA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Ada County	3.2	2.4	2.7
Canyon County	3.9	3.1	3.4
Idaho State Average	3.6	2.8	3.1
National Average	5.3	3.6	3.6
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a high level of competition for financial services in the AA. According to the June 30, 2024, FDIC Deposit Market Share Report, 23 institutions operate 143 branches in the AA. BB ranked 13th among these institutions with a market share of 1.9 percent. The top three institutions consist of a large, national associations that have a combined market share of more than 51.0 percent.

Community Contact

Examiners reviewed an existing community contact with an economic development organization that offers free services to businesses and entrepreneurs interested in relocating, starting up or expanding their businesses in the AA. According to the contact, the economic conditions in the AA have improved recently, but there is less demand for small business, SBA 504 and federal government loan programs. High-tech companies have expanded operations which has resulted in a demand for highly skilled professionals and jobs to the local area. However, the influx in population has created a strain on housing stock and a shortage in construction workers. According to the contact, these factors are causing the cost of housing to rise, and affordable housing is a primary CD need.

Credit and Community Development Needs and Opportunities

Based on information demographic and economic data and information received from a community contact, examiners determined that support for affordable housing is a primary CD credit need in the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BOISE CITY MSA ASSESSMENT AREA

LENDING TEST

Lending Test performance in the Boise City MSA is consistent with the state of Idaho's conclusions.

Lending Activity

BB's lending levels reflect good responsiveness to AA credit needs. Lending product trends in the Boise City MSA are generally consistent with overall bank performance; see bank-wide section for discussion.

According to Peer Mortgage Data, the bank's ranking among other reporting institutions rose each year in the evaluation period while the relative market share remained stable. In 2021, BB ranked 77th of the 455 reporting institutions that made a total of 67,957 loans with a market share of 0.2 percent by number. In 2022, BB ranked 71st of 446 reporting institutions that made a total of 33,941 loans with a market share of 0.2 percent. In 2023, the bank's ranking rose to 62nd of 393 reporting institutions that made a total of 21,342 loans, which resulted in a market share of 0.3 percent. The bank's decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 16th among 124 reporting institutions that made 9,324 total loans with a market share of 1.0 percent. In 2022, the bank was ranked 18th out of 114 reporters that made a total of 9,676 loans with a market share of 0.5 percent. In 2023, BB ranked 18th among 102 reporters that made a total of 9,396 loans for an overall market share of 0.4 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. This conclusion is supported by good home mortgage and excellent small business lending distributions.

Home Mortgage Loans

The bank's lending in LMI geographies is good. Lending in low-income CTs was above aggregate and demographic data for each year in the evaluation period. In 2021, lending in moderate-income geographies lagged aggregate performance to a large degree. In 2022, BB's performance improved to the point that it was more closely aligned with demographic and aggregate data. In 2023, the bank's performance trended upward again and was substantially higher than the comparators.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Boise City MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	1.5	1.5	3	2.0	1,561	2.9
2022	0.6	0.9	1	1.2	215	0.8
2023	0.6	0.7	1	1.5	177	0.3
Moderate						
2021	22.2	19.0	17	11.6	3,087	5.7
2022	15.0	15.7	12	14.0	4,628	18.2
2023	15.0	16.4	15	22.7	23,771	45.3
Middle						
2021	46.4	48.1	75	51.0	33,158	61.4
2022	51.0	50.7	44	51.2	10,132	39.8
2023	51.0	50.1	26	39.4	12,850	24.5
Upper						
2021	29.9	31.4	52	35.4	16,155	29.9
2022	33.3	32.7	29	33.7	10,451	41.1
2023	33.3	32.8	24	36.4	15,729	29.9
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	147	100.0	53,960	100.0
2022	100.0	100.0	86	100.0	25,426	100.0
2023	100.0	100.0	66	100.0	52,527	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

BB's lending in low-income CTs was strong and substantially exceeded demographic and aggregate data each year in the evaluation period. The bank's performance of lending in moderate-income tracts was also significantly above both comparators for each year. Based on these factors, the bank's performance is excellent.

Geographic Distribution of Small Business Loans						
Assessment Area: Boise City MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	8.2	9.5	20	11.8	4,169	15.4
2022	1.7	1.6	5	4.7	775	3.4
2023	1.6	1.4	3	3.4	1,557	8.8
Moderate						
2021	21.5	20.6	46	27.1	8,709	32.1
2022	16.4	17.0	24	22.4	5,647	24.9
2023	16.4	16.7	22	25.0	4,248	24.0
Middle						
2021	39.5	38.0	67	39.4	8,460	31.2
2022	46.6	47.1	51	47.7	9,522	42.0
2023	46.6	46.5	38	43.2	6,127	34.6
Upper						
2021	30.8	31.8	37	21.8	5,802	21.4
2022	35.2	34.2	27	25.2	6,705	29.6
2023	35.4	35.4	25	28.4	5,763	32.6
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.1	0.1	0	0.0	0	0.0
2023	0.1	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	170	100.0	27,140	100.0
2022	100.0	100.0	107	100.0	22,649	100.0
2023	100.0	100.0	88	100.0	17,695	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes in the AA. This conclusion is supported by adequate home mortgage and small business lending performance.

Home Mortgage Loans

In 2021, lending to low-income borrowers was commensurate with aggregate data. In 2022, performance declined and was below aggregate. In 2023, performance improved and was once

again comparable to peer. In 2021, BB's lending in moderate-income tracts was well above aggregate and above demographic data. Performance declined in 2022 but remained on par with other reporters. Performance remained stable in 2023 and was aligned with aggregate data. Considering all the factors, BB's performance is adequate.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Boise City MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	18.9	5.0	7	4.8	970	1.8
2022	16.8	6.0	3	3.5	339	1.3
2023	16.8	4.7	3	4.5	264	0.5
Moderate						
2021	18.6	15.0	30	20.4	5,415	10.0
2022	19.0	15.7	13	15.1	2,033	8.0
2023	19.0	16.9	11	16.7	1,985	3.8
Middle						
2021	21.8	23.6	31	21.1	5,860	10.9
2022	22.9	25.0	14	16.3	3,140	12.4
2023	22.9	27.3	11	16.7	1,366	2.6
Upper						
2021	40.7	44.7	73	49.7	20,955	38.8
2022	41.3	44.7	52	60.5	18,576	73.1
2023	41.3	40.2	34	51.5	10,936	20.8
Not Available						
2021	0.0	11.8	6	4.1	20,760	38.5
2022	0.0	8.6	4	4.7	1,337	5.3
2023	0.0	10.9	7	10.6	37,977	72.3
Totals						
2021	100.0	100.0	147	100.0	53,960	100.0
2022	100.0	100.0	86	100.0	25,426	100.0
2023	100.0	100.0	66	100.0	52,527	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

In 2021, BB's rate of lending to small businesses was well above aggregate. In 2022, the bank's performance declined slightly and lagged peer by a small amount. In 2023, BB's performance

declined once again and was below other reporting institutions. Considering the extent to which the bank outperformed peer in 2021 and maintained comparable performance in 2022, BB's performance is adequate.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Boise City MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	91.6	51.6	98	57.6	8,468	31.2
2022	92.7	53.0	54	50.5	9,332	41.2
2023	93.3	53.9	41	46.6	4,059	22.9
>\$1,000,000						
2021	2.4	--	72	42.4	18,672	68.8
2022	2.1	--	53	49.5	13,317	58.8
2023	1.9	--	47	53.4	13,636	77.1
Revenue Not Available						
2021	6.0	--	0	0.0	0	0.0
2022	5.2	--	0	0.0	0	0.0
2023	4.8	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	170	100.0	27,140	100.0
2022	100.0	100.0	107	100.0	22,649	100.0
2023	100.0	100.0	88	100.0	17,695	100.0
<i>Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.</i>						

Community Development Loans

BB is a leader in making CD loans in the Boise City MSA AA. Lending decreased by number but increased by dollar volume from the prior evaluation where BB originated 10 loans totaling \$35.1 million. In the prior evaluation, 3 CD loans totaling \$4.2 million were PPP loans. Performance is consistent by number of loans and 48.1 percent higher by dollar volume when PPP loans are not included in the calculation. The bank demonstrated responsiveness to the AA's CD credit needs with its focus on supporting affordable housing.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	2	5,860	-	-	-	-	-	-	2	5,860
2022	-	-	-	-	-	-	-	-	-	-
2023	4	37,597	-	-	-	-	-	-	4	37,597
2024	2	8,593	-	-	-	-	-	-	2	8,593
Total	8	52,050	-	-	-	-	-	-	8	52,050
<i>Source: Bank Data</i>										

Examples of CD loan activity include the following:

- In 2021, the bank originated a \$4.7 million loan for a 32-unit community that provides low-income seniors affordable housing. Twenty-eight of the units are set aside for senior households earning 50.0 percent or less than the area's median income.
- In 2023, the bank originated a \$9.4 million loan for an affordable housing project to construct a multifamily property located in an upper-income CT where a majority of the units will be rent controlled for LMI individuals and families.
- In 2023, BB originated a \$9.4 million loan to develop a multifamily complex with 41 of the units are set aside for homeless households. The five remaining units are at market rate, with one apartment designated as the manager's unit.

INVESTMENT TEST

Investment Test performance in the Boise City MSA AA is consistent with the state of Idaho's conclusions.

Investment and Grant Activity

BB has a significant level of qualified CD investments and grants. Investment activity increased \$6.5 million compared to the prior evaluation. The prior evaluation had a total of \$1.2 million in investments, compared to this exam's total of \$7.6 million. BB's level of investments and grants in the Boise City MSA AA compares favorably to peer institutions. The following table shows a breakdown of qualified investments and donations activity by year and CD category.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	1	1,059	-	-	-	-	1	1,059
2021	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	-	-	-	-	-	-
2023	1	6,500	-	-	-	-	-	-	1	6,500
2024	-	-	-	-	-	-	-	-	-	-
Subtotal	1	6,500	1	1,059	-	-	-	-	2	7,559
Qualified Grants & Donations	4	17	13	43	-	-	-	-	17	60
Total	5	6,517	14	1,102	-	-	-	-	19	7,619
<i>Source: Bank Data</i>										

The following are notable examples of the institution's CD investments in the AA:

- The bank continues to hold a \$1.1 million bond which finances the construction of a new high school where 53.0 percent of the students qualified for the free or reduced lunch program.
- In 2023, management invested in a \$6.5 million LIHTC project providing 40 units of housing for LMI families in Ada County.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and community development needs in the AA. Most of the investments are targeted towards affordable housing, which is a need in the Boise City MSA AA.

Community Development Initiatives

The bank occasionally uses innovative and/or complex investments to support CD initiatives, such as low-income housing tax credits. Refer to Idaho conclusions for detail.

SERVICE TEST

Service Test performance in the Boise City AA is consistent with the state of Idaho's conclusions.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's AA. The institution operates four full-service branches, four ATMs, and one LPO in the AA. Only one, or 25.0 percent, of the institution's branches is in a moderate-income tract, which is slightly above the 24.5 percent of branches other institutions operate in moderate-income geographies.

Of the other three branches, two branches are in middle-income tracts and one branch is located in an upper-income tract. Mapping of branch locations indicated a general proximity to LMI geographies, except in the northwest sector of the two-county AA. Refer to the bank-wide

discussion of alternative delivery systems, which improve accessibility of the institution's delivery systems in the AA.

Changes in Branch Locations

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals, as the institution did not open or close any branches in the AA during the review period.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the Boise City MSA AA, particularly LMI geographies and/or LMI individuals. Refer to the bank-wide discussion for further details.

Community Development Services

BB is a leader in providing CD services to the Boise City MSA AA; see the following table for details. Bank management provided a total of 527 CD service hours to various organizations in the AA. Performance increased since the prior evaluation, where bank employees provided 278 service hours. The increase in performance demonstrates the bank's targeted approach in increasing service hours in the AA. BB's level of service hours provided to the AA compares favorably to peer institutions.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	4	10	-	-	14
2022	32	21	54	-	107
2022	32	115	38	-	185
2024	10	192	19	-	221
Total	78	338	111	-	527
<i>Source: Bank Data</i>					

The following are examples of services provided by BB employees during the review period:

- From 2022 to 2024, a bank employee supported community service initiatives in the AA by serving 98 hours on the Board of an organization with a mission to provide technical assistance on financial matters to small businesses and CD organizations.
- In 2023 a bank employee supported community service initiatives by serving 53 hours on the Board of an organization that provides high-quality, accessible health care at a cost that is affordable to LMI individuals and families in the AA.
- In 2024, a bank employee supported affordable housing initiatives in the AA by serving 62 hours on the Board of an organization with a mission to provide affordable housing to underserved populations of the AA.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

Conclusions for the three Idaho AAs reviewed using limited-scope examination procedures are summarized in the following table. Examiners drew conclusions regarding the bank's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons and demographic information. The conclusions inconsistent with the Idaho rated area did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Coeur d'Alene MSA	Consistent	Below	Below
Idaho Non-MSA	Below	Below	Consistent
Twin Falls MSA	Consistent	Consistent	Below

Facts and data supporting conclusions for each limited-scope AA follow, beginning with a summary of the institution's operations and activities. Geographic distribution and borrower profile tables by loan type are included in an appendix. Description of the limited-scope AAs, including changes to individual AAs, demographic data and market share information are also included in an appendix.

Coeur d'Alene MSA

BB exited the AA with the closure of its sole branch in a middle-income CT in June of 2022. The branch distribution is below the overall bank performance.

Activity	#	\$
Small Business Loans	61	12,830
Home Mortgage Loans	135	44,501
Small Farm Loans	-	-
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	-	-
CD Services	13	-
<i>Source: Bank Data</i>		

Idaho Non-MSA

BB operates three branches in the AA and did not open or close any branches during the evaluation period. The branch distribution is consistent with overall bank performance.

Activity	#	\$
Small Business Loans	235	22,290
Home Mortgage Loans	101	23,717
Small Farm Loans	-	-
Community Development Loans	1	50
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	-	-
CD Services	396	-
<i>Source: Bank Data</i>		

Twin Falls MSA

BB operates one branch in the AA and did not open or close any branches during the evaluation period. The branch distribution is below overall bank performance.

Activity	#	\$
Small Business Loans	51	15,705
Home Mortgage Loans	21	21,046
Small Farm Loans	-	-
Community Development Loans	2	14,680
Investments (New)	1	1,489
Investments (Prior Period)	-	-
Donations	-	-
CD Services	102	-
<i>Source: Bank Data</i>		

LEWISTON MULTISTATE MSA

CRA RATING FOR LEWISTON MULTISTATE MSA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LEWISTON MULTISTATE MSA ASSESSMENT AREA

The Lewiston Multistate MSA AA is in the southeastern portion of Washington and extends into west-central Idaho. The AA consists of all 6 CTs of Asotin County in Washington, and all 10 CTs of Nez Perce County in Idaho. These counties form the Lewiston, Washington-Idaho Multistate MSA in its entirety. BB did not make any changes to the AA during the review period.

Economic and Demographic Data

According to the 2020 U.S. Census, the Lewiston Multistate AA consists of 0 low-, 4 moderate-, 9 middle-, and 3 upper-income CTs. Demographic data is shown in the following table.

Demographic Information of the Assessment Area						
Assessment Area: Lewiston Multistate MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	25.0	56.3	18.8	0.0
Population by Geography	64,375	0.0	19.7	57.7	22.5	0.0
Housing Units by Geography	27,998	0.0	21.0	57.8	21.1	0.0
Owner-Occupied Units by Geography	18,780	0.0	17.6	55.6	26.8	0.0
Occupied Rental Units by Geography	7,054	0.0	29.7	61.9	8.4	0.0
Vacant Units by Geography	2,164	0.0	22.3	64.1	13.6	0.0
Businesses by Geography	6,329	0.0	17.6	65.7	16.7	0.0
Farms by Geography	432	0.0	5.8	76.2	18.1	0.0
Family Distribution by Income Level	16,505	21.6	18.0	21.0	39.5	0.0
Household Distribution by Income Level	25,834	22.8	17.7	16.8	42.6	0.0
Median Family Income MSA - 30300 Lewiston, ID-WA MSA		\$74,144	Median Housing Value			\$203,296
			Median Gross Rent			\$762
			Families Below Poverty Level			7.5%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to data from Moody's, housing costs are rising but remain more affordable than larger metropolitan areas. Comparisons between the median family income level and median housing value also suggest housing costs are moderate. Various factors are impactful on the area's economy including fisheries, casinos and tribal employment. Weak growth in non-farm payrolls, volatility in the public sector and the leisure/hospitality industries impact labor force growth. However, the manufacturing, healthcare, and education sectors have remained strong. The largest private employers in the area are, in order, Clearwater Paper, the Nez Perce Tribe, Vista Outdoor, St. Joseph Regional Medical Center and Lewis Clark State College.

Unemployment rates for each county generally improved during the evaluation period and varied to a degree between the averages for the states and the nation. See the following table.

Lewiston Multistate MSA AA - Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Asotin County	3.8	3.7	3.4
Nez Perce County	3.2	2.7	2.8
Washington State Average	5.2	4.1	4.1
Idaho State Average	3.6	2.8	3.1
National Average	5.3	3.6	3.6
<i>Source: Bureau of Labor Statistics</i>			

Competition

According to the June 30, 2024, FDIC Deposit Market Share Report, 9 institutions operate 15 branches in the AA. BB ranked 3rd with a market share of 16.4 percent. The top two institutions consist of a large national association and a large regional bank, which together share 38.8 percent of the overall market share.

Community Contacts

Examiners conducted two community contacts with operations in the AA. One contact was with a business development organization that serves to enhance economic well-being, attract new businesses and assist entrepreneurs with programs, policies and activities in the area. The contact explained that the local economy has been challenging for smaller businesses. There is mixed opportunity, and small businesses may struggle to qualify for traditional credit from local banks. The contact noted that local area financial institutions have a record of satisfactorily serving the needs of small businesses; however, there is a gap in flexible financing for very small businesses.

The second contact was with a local housing organization that helps provide housing grants for affordable housing and consultation and education on fair housing laws and practices. The contact stated that securing affordable housing is challenging in the AA. However, there are affordable housing initiatives in place that include efforts to work with local tribal communities to assist with financing grants for homeless youth. The contact also mentioned a primary need in the community is assistance for first-time homebuyers and services for LMI individuals and families.

Credit and Community Development Needs and Opportunities

Considering information from bank management, community contacts and demographic data, affordable housing for first-time home buyers and services for LMI individuals represent primary credit needs in the AA. Opportunities also exist for supporting small businesses through economic development activities and financial education.

SCOPE OF EVALUATION – LEWISTON MULTISTATE MSA

Examiners conducted a full-scope review of the Lewiston Multistate MSA. Product weighting and rationale in the Lewiston Multistate MSA is consistent with the overall Scope of Evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LEWISTON MULTISTATE MSA ASSESSMENT AREA

LENDING TEST

The Lewiston Multistate MSA Lending Test performance is “Low Satisfactory.”

Lending Activity

BB’s lending levels reflect good responsiveness to AA credit needs. Lending product trends in the Lewiston Multistate MSA are consistent with overall bank performance; see bank-wide section for details.

According to Peer Mortgage Data, the bank’s ranking among other reporting institutions rose each year in the evaluation period while the relative market share remained stable. In 2021, BB ranked 20th of the 178 reporting institutions that made a total of 3,263 loans with a market share of 1.2 percent by number. In 2022, BB ranked 14th of 155 reporting institutions that made a total of 1,991 loans with a market share of 1.8 percent. In 2023, the bank’s ranking was 14th of 123 reporting institutions that made a total of 1,278 loans, which resulted in a market share of 1.8 percent. The bank’s decreasing home mortgage loan volumes mirror the same year over year declining trend of originations by reporting lenders.

Peer Small Business data for 2021 shows that BB ranked 5th among 48 reporting institutions that made 573 total loans with a market share of 6.9 percent. In 2022, the bank was ranked 5th out of 49 reporters that made a total of 569 loans with a market share of 4.2 percent. In 2023, BB ranked 7th among 39 reporters that made 465 loans for an overall market share of 3.6 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AA. This conclusion is supported by good home mortgage lending performance and adequate small business lending performance. The AA doesn’t include any low-income geographies; therefore, performance conclusions are based on the bank’s lending activities in moderate-income tracts.

Home Mortgage Loans

Lending in moderate-income geographies trended upward each year in the evaluation period and was consistently above demographic data. In 2021, BB's performance was above the rate achieved by other reporters. In 2022, the bank's percentage rose dramatically and was on par with aggregate. In 2023, the bank's performance increased again and was above aggregate. Considering the extent to which the bank's performance exceeded demographic and aggregate data, BB's performance is good.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Lewiston Multistate MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	7.6	8.3	4	10.0	189	2.5
2022	17.6	20.2	7	19.4	317	6.2
2023	17.6	19.7	5	20.8	664	15.3
Middle						
2021	67.8	66.1	24	60.0	4,666	62.1
2022	55.6	53.6	16	44.4	2,780	54.1
2023	55.6	54.0	11	45.8	2,519	58.0
Upper						
2021	24.6	25.6	12	30.0	2,656	35.4
2022	26.8	26.2	13	36.1	2,040	39.7
2023	26.8	26.3	8	33.3	1,163	26.8
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	40	100.0	7,511	100.0
2022	100.0	100.0	36	100.0	5,137	100.0
2023	100.0	100.0	24	100.0	4,346	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

BB's small business performance is adequate. In 2021, BB's lending in moderate-income CTs was commensurate with aggregate performance. Although the bank's percentage of loans increased in 2022, the performance was below other reporters, which demonstrated improved performance during the same time period. In 2023, BB's lending performance increased and was more comparable to peer data.

Geographic Distribution of Small Business Loans						
Assessment Area: Lewiston Multistate MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	10.4	8.9	7	8.6	368	2.6
2022	17.8	15.6	5	11.4	1,383	16.3
2023	17.6	14.7	4	12.9	330	6.5
Middle						
2021	70.6	69.1	53	65.4	11,187	80.5
2022	65.3	67.5	35	79.5	6,369	75.1
2023	65.6	68.8	22	71.0	3,842	75.3
Upper						
2021	18.9	22.0	21	25.9	2,334	16.8
2022	16.8	16.9	4	9.1	727	8.6
2023	16.7	16.6	5	16.1	933	18.3
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	81	100.0	13,889	100.0
2022	100.0	100.0	44	100.0	8,479	100.0
2023	100.0	100.0	31	100.0	5,105	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different revenue sizes. This conclusion is supported by adequate home mortgage and small business lending performance.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among borrowers of different income levels. BB's record of lending to low-income borrowers was significantly above peer each year in the review period. In 2021, lending to moderate-income borrowers was lower than the rate achieved by aggregate, but BB's performance improved in 2022, to a level that was on par with aggregate data and significantly higher than demographics. In 2023, the bank's performance fell, but not by an unreasonable amount as it was comparable to demographic data.

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Lewiston Multistate MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	18.9	6.0	8	20.0	640	8.5
2022	21.6	12.4	6	16.7	609	11.9
2023	21.6	6.3	3	12.5	282	6.5
Moderate						
2021	20.0	18.8	5	12.5	596	7.9
2022	18.0	27.1	9	25.0	846	16.5
2023	18.0	19.7	4	16.7	393	9.0
Middle						
2021	22.2	25.5	9	22.5	1,471	19.6
2022	21.0	25.5	10	27.8	1,696	33.0
2023	21.0	26.7	4	16.7	349	8.0
Upper						
2021	38.9	33.1	17	42.5	4,531	60.3
2022	39.5	24.2	10	27.8	1,973	38.4
2023	39.5	35.8	12	50.0	3,160	72.7
Not Available						
2021	0.0	16.5	1	2.5	273	3.6
2022	0.0	10.9	1	2.8	14	0.3
2023	0.0	11.5	1	4.2	162	3.7
Totals						
2021	100.0	100.0	40	100.0	7,511	100.0
2022	100.0	100.0	36	100.0	5,137	100.0
2023	100.0	100.0	24	100.0	4,346	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

Overall lending to small businesses is adequate. BB's lending to small businesses in the AA was stable and trailed aggregate data slightly throughout the review period but was generally commensurate with the performance of reporting lenders.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Lewiston Multistate MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	84.1	55.4	40	49.4	3,083	22.2
2022	85.6	59.2	24	54.5	2,444	28.8
2023	86.4	58.1	17	54.8	1,111	21.8
>\$1,000,000						
2021	4.0	--	41	50.6	10,806	77.8
2022	3.7	--	20	45.5	6,035	71.2
2023	3.4	--	13	41.9	3,974	77.8
Revenue Not Available						
2021	11.8	--	0	0.0	0	0.0
2022	10.8	--	0	0.0	0	0.0
2023	10.2	--	1	3.2	20	0.4
Totals						
2021	100.0	100.0	81	100.0	13,889	100.0
2022	100.0	100.0	44	100.0	8,479	100.0
2023	100.0	100.0	31	100.0	5,105	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						
Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Community Development Loans

BB made an adequate level of CD loans in the Lewiston Multistate MSA AA. The bank originated one CD loan totaling \$5.9 million to provide construction financing for a 72-unit complex. The property is comprised of 1-, 2- and 3-bedroom units allocated to households earning at or below 30.0 to 60.0 percent of the area median income. CD lending declined by number but increased by dollar volume compared to the prior evaluation where bank originated 3 loans totaling \$1.9 million. The bank's support of affordable housing initiatives demonstrates responsiveness to a CD need identified in the AA.

INVESTMENT TEST

BB is rated "High Satisfactory" in the Investment Test for the Lewiston MSA Multistate AA.

Investment and Grant Activity

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. BB reported 7 qualified investments and donations that totaled approximately \$3.8 million. The bank

held 1 prior period investment totaling \$3.1 million and reported approximately \$20,000 in grants and donations.

The current dollar amount of investments and donations in the AA is 1.0 percent of the institution's total qualified CD investments and donations for all the rated areas combined. The following table illustrates the breakdown of qualified investments and donations activity by area and CD category.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	1	3,055	-	-	1	3,055
2021	-	-	-	-	-	-	-	-	-	-
2022	-	-	2	3,750	-	-	-	-	2	3,750
2023	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-
Subtotal	-	-	2	3,750	1	3,055	-	-	3	6,805
Qualified Grants & Donations	-	-	5	20	-	-	-	-	5	20
Total	-	-	7	3,770	1	3,055	-	-	8	6,825
<i>Source: Bank Data</i>										

BB's investments consisted of 2 bonds totaling \$3.8 million issued by Nez Perce County to finance improvements and construction of new facilities. These investments provide essential community services in a census tract that meets the federal designations of an Opportunity Zone and New Market Tax Credits.

Responsiveness to Credit and Community Development Needs

BB exhibits good responsiveness to credit and CD needs in the AA. Many of the investments support community services targeting LMI populations, which is an identified need in the Lewiston Multistate MSA AA.

Community Development Initiatives

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. BB's qualified investments are predominantly comprised of bonds that support community services in designated opportunity zones in the AA.

SERVICE TEST

Service Test performance in the Lewiston Multistate MSA is rated "Low Satisfactory."

Accessibility of Delivery Systems

Delivery systems are readily accessible to essentially all portions of the institution's AA. The institution operates two full-service branches and two ATMs in the AA. No low-income tracts exist in the AA. One, or 50.0 percent, of the institution's branches is in a moderate-income tract, which

compares favorably to 37.5 percent of branches of other institutions who operate in moderate-income geographies.

The other branch is in an upper-income tract. Mapping shows that the two branches are closely located to the single grouping of four moderate-income geographies in the two-county AA, providing full accessibility to moderate-income tracts and LMI individuals. Refer to the bank-wide section for discussion of alternative delivery systems.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to LMI individuals. The institution did not open any branches in the AA during the review period, but did close a branch in a middle-income tract. The branch closure didn't impact the moderate-income geographies in the AA and due to its former proximity to the two branches still in operation, it had no adverse impact to LMI individuals.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences the Lewiston Multistate MSA AA, particularly moderate-income geographies and/or LMI individuals. Refer to the bank-wide discussion for further details.

Community Development Services

BB provides an adequate level of CD services in Lewiston Multistate MSA. Bank employees provided a total of 165 service hours to 8 different CD organizations in the AA. Performance decreased since the prior evaluation, where employees provided 276 hours. The majority of service hours supported various community service initiatives, which is CD need identified by community contact information. BB's level of service hours provided in the AA is adequately comparable to peer institutions.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	1	52	21	-	74
2022	2	31	13	-	46
2023	3	-	14	-	17
2024	5	19	4	-	28
Total	11	102	52	-	165
<i>Source: Bank Data</i>					

The following are examples of CD services during the review period:

- In 2021 and 2025, a bank employee promoted community services by serving 42 hours on the Board of an organization that aids LMI individuals and families in the AA.
- In 2023, a bank employee contributed a total of 14 hours serving on the Board of an economic development organization that provides services to small businesses in the AA.

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

Banner Bank	
Scope of Examination: Full scope reviews were performed on the following assessment areas within the noted rated areas: State of Washington: Seattle-Tacoma CSA Assessment Area Wenatchee MSA Assessment Area State of California: Los Angeles-Long Beach CSA Assessment Area State of Oregon: Oregon Non-MSA Assessment Area Portland-Vancouver-Hillsboro Multistate MSA Assessment Area State of Idaho: Idaho Non-MSA Assessment Area Lewiston Multistate MSA Assessment Area Limited scope reviews were performed on the following assessment areas within the noted rated areas: State of Washington: Kennewick-Richland-Walla Walla CSA Assessment Area Bellingham MSA Assessment Area Spokane-Spokane Valley MSA Assessment Area Washington Non-MSA Assessment Area Yakima MSA Assessment Area State of California: California Non-MSA Assessment Area Chico MSA Assessment Area Redding-Red Bluff CSA Assessment Area Sacramento-Roseville CSA Assessment Area San Diego-Chula Vista-Carlsbad MSA Assessment Area Santa Rosa-Petaluma MSA Assessment Area State of Oregon: Eugene-Springfield MSA Assessment Area Medford-Grants Pass CSA Assessment Area State of Idaho: Coeur d'Alene MSA Assessment Area Idaho Non-MSA Assessment Area Twin Falls MSA Assessment Area	
Time Period Reviewed:	4/6/2021 to 12/17/2024
Products Reviewed: Home Mortgage: 1/1/2021 – 12/31/2023 Small Business: 1/1/2021 – 12/31/2023	

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Washington	High Satisfactory	Outstanding	Outstanding	Outstanding
California	High Satisfactory	Outstanding	Outstanding	Outstanding
Oregon	Low Satisfactory	Outstanding	Outstanding	Satisfactory
PVH Multistate MSA	Low Satisfactory	Outstanding	Outstanding	Satisfactory
Idaho	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Lewiston Multistate MSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

DESCRIPTION OF THE LIMITED-SCOPE ASSESSMENT AREAS

WASHINGTON

Kennewick-Richland-Walla Walla CSA

The AA is in southeastern Washington along the Oregon border and is comprised of Benton and Franklin Counties, which form the Kennewick-Richland MSA and Walla Walla County, which forms the Walla Walla MSA. It consists of 3 low-, 23 moderate-, 31 middle- and 20 upper-income CTs. Four CTs have no income designation. No changes were made to the AA during the evaluation period.

Demographic Information of the Assessment Area						
Assessment Area: Kennewick-Richland-Walla Walla CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	3.7	28.4	38.3	24.7	4.9
Population by Geography	366,206	2.1	25.9	42.5	28.2	1.4
Housing Units by Geography	130,975	2.0	27.7	42.5	27.1	0.8
Owner-Occupied Units by Geography	83,946	0.8	20.5	44.1	34.4	0.2
Occupied Rental Units by Geography	39,163	4.3	42.5	38.2	12.9	2.2
Vacant Units by Geography	7,866	2.6	31.5	46.5	19.4	0.0
Businesses by Geography	34,528	2.0	26.5	41.2	29.3	1.0
Farms by Geography	2,209	0.8	15.8	64.8	18.2	0.5
Family Distribution by Income Level	86,466	19.9	18.3	20.6	41.2	0.0
Household Distribution by Income Level	123,109	22.5	17.1	19.0	41.5	0.0
Median Family Income MSA - 28420 Kennewick-Richland, WA MSA		\$80,918	Median Housing Value			\$240,053
Median Family Income MSA - 47460 Walla Walla, WA MSA		\$75,853	Median Gross Rent			\$1,009
			Families Below Poverty Level			8.1%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the June 30, 2024, FDIC Market Share Data, 18 financial institutions operated 62 full-service branches within the AA. Of these institutions, BB ranked 1st, with a 17.4 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 17th with a market share of 1.9 percent among 408 lenders who reported 31,001 loans. In 2022, BB ranked 8th with a market share of 2.6 percent among 398 lenders who reported 18,385

loans. In 2023, BB ranked 9th with a market share of 2.4 percent among 351 lenders who reported 11,677 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 5th with a market share of 8.3 percent among 75 lenders who reported 6,133 loans. In 2022, BB ranked 8th with a market share of 3.8 percent among 70 lenders who reported 6,156 loans. In 2023, BB ranked 9th with a market share of 2.1 percent among 64 lenders who reported 3,197 loans.

Bellingham MSA

The AA is in the northwest corner of Washington and consists of Whatcom County. There were no changes to the AA during the review period. The AA consists of 1 low-, 12 moderate-, 26 middle- and 14 upper-income CTs. One CT has no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Bellingham MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	1.9	22.2	48.1	25.9	1.9
Population by Geography	226,847	0.9	21.5	52.8	23.0	1.9
Housing Units by Geography	98,000	1.4	20.8	50.2	25.7	2.0
Owner-Occupied Units by Geography	55,361	0.1	14.6	54.9	29.2	1.2
Occupied Rental Units by Geography	33,617	3.6	28.6	47.3	17.0	3.6
Vacant Units by Geography	9,022	0.3	30.4	32.0	36.4	0.9
Businesses by Geography	34,099	4.9	14.4	53.2	25.2	2.3
Farms by Geography	1,462	0.5	10.3	60.3	27.4	1.4
Family Distribution by Income Level	53,699	19.0	18.9	23.2	38.9	0.0
Household Distribution by Income Level	88,978	23.9	15.7	18.7	41.7	0.0
Median Family Income MSA - 13380 Bellingham, WA MSA		\$83,751	Median Housing Value			\$364,713
			Median Gross Rent			\$1,124
			Families Below Poverty Level			7.3%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 19 financial institutions operated 61 full-service branches within the AA. Of these institutions, BB ranked 5th, with a 9.2 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB

ranked 11th with a market share of 1.8 percent among 407 lenders who reported 20,868 loans. In 2022, BB ranked 9th with a market share of 2.5 percent among 376 lenders who reported 10,737 loans. In 2023, BB ranked 6th with a market share of 2.6 percent among 309 lenders who reported 7,010 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 9th with a market share of 4.6 percent among 71 lenders who reported 6,234 loans. In 2022, BB ranked 12th with a market share of 1.7 percent among 67 lenders who reported 5,597 loans. In 2023, BB ranked 9th with a market share of 1.6 percent among 66 lenders who reported 2,804 loans.

Spokane-Spokane Valley MSA

The AA is in eastern Washington and borders Idaho and is comprised of Spokane and Stevens Counties. BB exited Stevens County with the sale of its three branches in June 2022. Stevens County is included in the analysis for 2021 and applicable portion of 2022. The following table includes details for both counties combined. Analysis for 2023 is based on performance in Spokane County only. The AA consists of 4 low-, 35 moderate-, 55 middle- and 34 upper-income CTs. Two CTs have no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Spokane-Spokane MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	3.1	26.9	42.3	26.2	1.5
Population by Geography	539,339	2.4	25.8	43.5	27.0	1.3
Housing Units by Geography	219,964	2.7	27.2	43.9	25.2	1.1
Owner-Occupied Units by Geography	130,298	1.9	16.7	48.6	32.7	0.1
Occupied Rental Units by Geography	76,204	3.9	44.2	36.4	13.0	2.5
Vacant Units by Geography	13,462	3.3	31.8	40.7	21.2	2.9
Businesses by Geography	70,018	1.1	24.0	33.9	22.5	18.4
Farms by Geography	2,192	1.1	15.1	42.7	34.9	6.1
Family Distribution by Income Level	129,359	19.3	18.5	21.3	40.9	0.0
Household Distribution by Income Level	206,502	22.9	16.9	18.3	41.9	0.0
Median Family Income MSA - 44060 Spokane-Spokane Valley, WA MSA		\$76,280	Median Housing Value			\$242,475
			Median Gross Rent			\$951
			Families Below Poverty Level			8.0%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 14 financial institutions operated 83 full-service branches within Spokane County. Of these institutions, BB ranked 17th, with a 6.3 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 16th with a market share of 1.5 percent among 501 lenders who reported 57,462 loans. In 2022, BB ranked 9th with a market share of 1.9 percent among 463 lenders who reported 30,483 loans. In 2023, BB ranked 13th with a market share of 1.7 percent among 399 lenders who reported 19,341 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 8th with a market share of 4.9 percent among 96 lenders who reported 11,722 loans. In 2022, BB ranked 13th with a market share of 2.1 percent among 91 lenders who reported 10,558 loans. In 2023, BB ranked 11th with a market share of 1.0 percent among 74 lenders who reported 5,591 loans.

Washington Non-MSA

The AA is located throughout central and eastern Washington and is comprised of Columbia, Grant, San Juan and Whitman Counties, which are not part of any larger MSA. No changes were made to the AA since the previous evaluation. The AA consists of 2 low-, 8 moderate-, 21 middle- and 12 upper-income CTs. Two CTs have no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Washington Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	4.4	17.8	46.7	26.7	4.4
Population by Geography	168,836	6.7	18.8	48.4	25.2	0.8
Housing Units by Geography	75,587	5.3	16.0	51.5	26.7	0.5
Owner-Occupied Units by Geography	36,372	0.5	10.4	55.8	33.2	0.1
Occupied Rental Units by Geography	24,275	13.4	27.5	40.1	18.4	0.5
Vacant Units by Geography	14,940	3.9	11.0	59.3	24.5	1.3
Businesses by Geography	17,121	1.5	12.7	54.2	31.2	0.4
Farms by Geography	2,132	0.1	9.7	60.0	28.5	1.6
Family Distribution by Income Level	38,152	21.9	16.5	20.1	41.4	0.0
Household Distribution by Income Level	60,647	26.8	15.1	16.3	41.7	0.0
Median Family Income Non-MSAs - WA		\$70,452	Median Housing Value			\$284,470
			Median Gross Rent			\$862
			Families Below Poverty Level			10.0%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 16 financial institutions operated 51 full-service branches within the AA. Of these institutions, BB ranked 1st, with a 17.1 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 7th with a market share of 2.4 percent among 365 lenders who reported 11,867 loans. In 2022, BB ranked 4th with a market share of 3.5 percent among 349 lenders who reported 7,176 loans. In 2023, BB ranked 4th with a market share of 3.5 percent among 293 lenders who reported 4,695 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 2nd with a market share of 10.5 percent among 66 lenders who reported 3,413 loans. In 2022, BB ranked 8th with a market share of 4.5 percent among 57 lenders who reported 2,983 loans. In 2023, BB ranked 8th with a market share of 4.0 percent among 51 lenders who reported 1,600 loans.

Yakima MSA

The Yakima MSA is comprised of Yakima County in south-central Washington. No changes were made to the AA since the previous evaluation. The AA consists of 1 low-, 15 moderate-, 22 middle- and 19 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: Yakima MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	1.8	26.3	38.6	33.3	0.0
Population by Geography	256,728	1.0	24.9	36.8	37.2	0.0
Housing Units by Geography	89,354	1.0	23.0	34.9	41.0	0.0
Owner-Occupied Units by Geography	52,222	0.2	16.2	35.5	48.1	0.0
Occupied Rental Units by Geography	31,543	2.5	34.3	34.9	28.3	0.0
Vacant Units by Geography	5,589	0.9	23.2	29.5	46.4	0.0
Businesses by Geography	19,883	6.1	21.4	30.4	42.1	0.0
Farms by Geography	1,656	1.6	14.0	41.5	42.9	0.0
Family Distribution by Income Level	60,339	20.3	18.5	21.6	39.6	0.0
Household Distribution by Income Level	83,765	21.5	17.5	20.1	40.9	0.0
Median Family Income MSA - 49420 Yakima, WA MSA		\$62,783	Median Housing Value			\$190,433
			Median Gross Rent			\$878
			Families Below Poverty Level			12.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 14 financial institutions operated 39 full-service branches within the AA. Of these institutions, BB ranked 1st, with a 20.4 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 12th with a market share of 2.2 percent among 347 lenders who reported 15,141 loans. In 2022, BB ranked 11th with a market share of 2.5 percent among 331 lenders who reported 9,474 loans. In 2023, BB ranked 12th with a market share of 2.6 percent among 268 lenders who reported 5,878 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 3rd with a market share of 10.4 percent among 67 lenders who reported 4,002 loans. In 2022, BB ranked 7th with a market share of 5.1 percent among 64 lenders who reported 3,487 loans.

In 2023, BB ranked 9th with a market share of 4.1 percent among 51 lenders who reported 1,878 loans.

CALIFORNIA

California Non-MSA

The AA is in the northern portion of California on the border with Oregon and is comprised of Siskyou County, which is an unincorporated County. There were no changes made to the AA since the previous evaluation. The AA consists of 0 low-, 9 moderate-, 7 middle- and 0 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: California Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	56.3	43.8	0.0	0.0
Population by Geography	44,076	0.0	56.9	43.1	0.0	0.0
Housing Units by Geography	24,177	0.0	57.8	42.2	0.0	0.0
Owner-Occupied Units by Geography	12,659	0.0	52.6	47.4	0.0	0.0
Occupied Rental Units by Geography	6,536	0.0	66.3	33.7	0.0	0.0
Vacant Units by Geography	4,982	0.0	59.8	40.2	0.0	0.0
Businesses by Geography	4,134	0.0	62.0	38.0	0.0	0.0
Farms by Geography	339	0.0	51.9	48.1	0.0	0.0
Family Distribution by Income Level	11,400	26.0	23.1	19.0	31.9	0.0
Household Distribution by Income Level	19,195	29.0	17.4	19.1	34.5	0.0
Median Family Income Non-MSAs - CA		\$70,728	Median Housing Value			\$210,440
			Median Gross Rent			\$921
			Families Below Poverty Level			10.6%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 6 financial institutions operated 15 full-service branches within the AA. Of these institutions, BB ranked 4th, with a 14.5 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 7th with a market share of 2.4 percent among 241 lenders who reported 2,895 loans. In 2022, BB ranked 5th with a market share of 3.8 percent among 210 lenders who reported 1,834 loans. In 2023, BB ranked 3rd with a market share of 6.4 percent among 175 lenders who reported 1,063 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 7th with a market share of 5.0 percent among 51 lenders who reported 932 loans. In 2022, BB ranked 12th with a market share of 1.7 percent among 47 lenders who reported 894 loans. In 2023, BB ranked 10th with a market share of 3.1 percent among 48 lenders who reported 482 loans.

Chico MSA

The Chico MSA is centrally located in the northern portion of California and is comprised of Butte County. No changes were made to the AA since the previous evaluation. The AA consists of 4 low-, 12 moderate-, 23 middle- and 15 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: Chico MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	7.4	22.2	42.6	27.8	0.0
Population by Geography	211,632	8.2	21.7	37.2	32.9	0.0
Housing Units by Geography	93,968	7.3	19.5	43.2	30.1	0.0
Owner-Occupied Units by Geography	49,887	2.8	15.1	46.7	35.4	0.0
Occupied Rental Units by Geography	33,992	13.1	25.4	36.8	24.7	0.0
Vacant Units by Geography	10,089	10.0	20.9	47.2	21.9	0.0
Businesses by Geography	18,339	6.6	20.2	39.2	34.0	0.0
Farms by Geography	1,247	2.4	12.2	41.1	44.3	0.0
Family Distribution by Income Level	50,847	24.9	15.2	18.1	41.8	0.0
Household Distribution by Income Level	83,879	26.9	15.0	14.9	43.1	0.0
Median Family Income MSA - 17020 Chico, CA MSA		\$71,089	Median Housing Value			\$305,236
			Median Gross Rent			\$1,081
			Families Below Poverty Level			10.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 13 financial institutions operated 38 full-service branches within the AA. Of these institutions, BB ranked 12th, with a 0.4 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 58th with a market share of 0.2 percent among 405 lenders who reported 15,199 loans. In 2022, BB ranked 43rd with a market share of 0.5 percent among 348 lenders who reported 8,135

loans. In 2023, BB ranked 49th with a market share of 0.4 percent among 320 lenders who reported 4,992 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 23rd with a market share of 0.5 percent among 80 lenders who reported 4,832 loans. In 2022, BB ranked 22nd with a market share of 0.4 percent among 72 lenders who reported 4,556 loans. In 2023, BB ranked 17th with a market share of 0.3 percent among 63 lenders who reported 2,357 loans.

Redding-Red Bluff CSA

The AA is centrally located in the northern portion of California. It is comprised of Shasta County, which forms the Redding MSA and Tehama County, an unincorporated County. No changes were made to the AA since the previous evaluation. The AA consists of 0 low-, 17 moderate-, 32 middle- and 15 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: Redding-Red Bluff CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	64	0.0	26.6	50.0	23.4	0.0
Population by Geography	247,984	0.0	28.8	51.1	20.1	0.0
Housing Units by Geography	106,106	0.0	28.6	52.6	18.8	0.0
Owner-Occupied Units by Geography	62,520	0.0	25.8	49.8	24.5	0.0
Occupied Rental Units by Geography	32,986	0.0	33.1	57.4	9.5	0.0
Vacant Units by Geography	10,600	0.0	31.5	54.1	14.4	0.0
Businesses by Geography	28,140	0.0	18.4	66.3	15.3	0.0
Farms by Geography	1,254	0.0	28.4	53.5	18.1	0.0
Family Distribution by Income Level	63,174	22.7	17.7	20.1	39.5	0.0
Household Distribution by Income Level	95,506	25.9	16.0	16.8	41.4	0.0
Median Family Income MSA - 39820 Redding, CA MSA		\$69,052	Median Housing Value			\$253,924
Median Family Income Non-MSAs - CA		\$70,728	Median Gross Rent			\$1,047
			Families Below Poverty Level			10.5%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 12 financial institutions operated 46 full-service branches within the AA. Of these institutions, BB ranked 9th, with a 2.9 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 43rd with a market share of 0.5 percent among 430 lenders who reported 22,190 loans. In 2022, BB ranked 30th with a market share of 0.9 percent among 393 lenders who reported 11,799 loans. In 2023, BB ranked 26th with a market share of 1.1 percent among 323 lenders who reported 7,306 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 13th with a market share of 1.4 percent among 91 lenders who reported 5,413 loans. In 2022, BB ranked 17th with a market share of 0.7 percent among 78 lenders who reported 5,317 loans. In 2023, BB ranked 14th with a market share of 0.5 percent among 74 lenders who reported 2,657 loans.

Sacramento-Roseville CSA

The AA is in central California and consists of Placer, Sacramento and Yolo Counties, which form a portion of the Sacramento-Roseville-Folsom MSA and Nevada County, which is an unincorporated County. No changes were made to the AA since the previous evaluation. The AA consists of 46 low-, 128 moderate-, 179 middle- and 174 upper-income CTs. Seven CTs have no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Sacramento-Roseville CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	534	8.6	24.0	33.5	32.6	1.3
Population by Geography	2,308,438	8.2	23.9	33.9	33.1	1.0
Housing Units by Geography	871,469	7.6	22.9	35.4	33.6	0.6
Owner-Occupied Units by Geography	490,013	3.8	18.1	37.6	40.3	0.2
Occupied Rental Units by Geography	318,751	13.6	31.4	32.3	21.5	1.2
Vacant Units by Geography	62,705	7.4	16.6	33.0	42.3	0.7
Businesses by Geography	279,209	8.0	27.7	29.8	32.9	1.5
Farms by Geography	6,521	5.1	20.8	36.1	37.2	0.8
Family Distribution by Income Level	540,163	23.1	16.7	19.1	41.1	0.0
Household Distribution by Income Level	808,764	24.7	15.9	17.2	42.3	0.0
Median Family Income MSA - 40900 Sacramento-Roseville-Folsom, CA MSA		\$90,500	Median Housing Value			\$420,409
Median Family Income Non-MSAs - CA		\$70,728	Median Gross Rent			\$1,380
			Families Below Poverty Level			8.7%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 37 financial institutions operated 274 full-service branches within the AA. Of these institutions, BB ranked 14th, with a 0.7 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 159th with a market share of 0.08 percent among 803 lenders who reported 240,976 loans. In 2022, BB ranked 93rd with a market share of 0.2 percent among 393 lenders who reported 11,799 loans. In 2023, BB ranked 77th with a market share of 0.2 percent among 661 lenders who reported 65,958 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 24th with a market share of 0.4 percent among 185 lenders who reported 67,285 loans. In 2022, BB ranked 26th with a market share of 0.3 percent among 167 lenders who reported 65,767 loans. In 2023, BB ranked 27th with a market share of 0.2 percent among 151 lenders who reported 37,349 loans.

San Diego-Chula Vista-Carlsbad MSA

The AA consists of San Diego County and is in southwestern California along the Pacific Ocean and borders Mexico. No changes were made to the AA since the previous evaluation. The AA consists of 46 low-, 167 moderate-, 262 middle- and 248 upper-income CTs. Fourteen CTs have no income designation.

Demographic Information of the Assessment Area						
Assessment Area: San Diego- Chula-Vista Carlsbad MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	737	6.2	22.7	35.5	33.6	1.9
Population by Geography	3,298,634	6.5	24.5	34.6	33.4	1.0
Housing Units by Geography	1,215,528	5.7	23.0	36.0	34.9	0.4
Owner-Occupied Units by Geography	609,350	2.4	15.8	37.2	44.4	0.2
Occupied Rental Units by Geography	521,353	9.8	31.5	34.7	23.3	0.7
Vacant Units by Geography	84,825	4.4	21.9	36.0	37.4	0.3
Businesses by Geography	445,045	3.8	17.4	34.2	43.7	0.9
Farms by Geography	8,200	3.4	17.8	38.6	40.0	0.2
Family Distribution by Income Level	759,418	22.8	17.3	18.7	41.2	0.0
Household Distribution by Income Level	1,130,703	24.4	16.0	17.6	42.0	0.0
Median Family Income MSA - 41740 San Diego-Chula Vista-Carlsbad, CA MSA		\$95,623	Median Housing Value			\$619,119
			Median Gross Rent			\$1,778
			Families Below Poverty Level			7.2%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 44 financial institutions operated 451 full-service branches within the AA. Of these institutions, BB ranked 16th, with a 0.5 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable year: In 2021, BB ranked 117th with a market share of 0.1 percent among 862 lenders who reported 309,264 loans. In 2022, BB ranked 58th with a market share of 0.3 percent among 813 lenders who reported 136,936 loans. In 2023, BB ranked 54th with a market share of 0.3 percent among 738 lenders who reported 82,279 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 21st with a market share of 0.4 percent among 255 lenders who reported 119,352 loans.

In 2022, BB ranked 38th with a market share of 0.1 percent among 187 lenders who reported 114,391 loans. In 2023, BB ranked 37th with a market share of 0.1 percent among 176 lenders who reported 60,601 loans.

Santa Rosa-Petaluma MSA

The AA is in Sonoma County, in the North Bay Region of California. BB exited the AA in February 2022, with the sale of its sole branch. Analysis is limited to performance for 2021. The AA consists of 0 low-, 24 moderate-, 53 middle- and 22 upper-income CTs. One CT has no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Santa Rosa-Petaluma MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	0.0	24.0	53.0	22.0	1.0
Population by Geography	495,078	0.0	27.0	52.3	20.7	0.0
Housing Units by Geography	206,399	0.0	25.1	53.7	21.2	0.0
Owner-Occupied Units by Geography	111,590	0.0	18.6	55.1	26.3	0.0
Occupied Rental Units by Geography	76,192	0.0	34.2	51.8	14.0	0.0
Vacant Units by Geography	18,617	0.0	26.6	53.1	20.3	0.0
Businesses by Geography	48,411	0.0	27.8	47.1	25.1	0.0
Farms by Geography	2,282	0.0	17.9	57.4	24.6	0.0
Family Distribution by Income Level	118,467	21.3	18.0	19.5	41.2	0.0
Household Distribution by Income Level	187,782	23.2	16.3	18.2	42.3	0.0
Median Family Income MSA - 42220 Santa Rosa-Petaluma, CA MSA		\$77,587	Median Housing Value			\$452,482
			Median Gross Rent			\$1,354
			Families Below Poverty Level			7.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2021, FDIC Deposit Market Share Data, 109 financial institutions operated 36 full-service branches within the AA. Of these institutions, BB ranked 24th, with a 0.2 percent deposit market share.

According to Peer Mortgage Data for 2021, BB ranked 232nd with a market share of 0.02 percent among 537 lenders who reported 44,729 loans originated or purchased.

According to Peer Small Business Data for 2021, BB ranked 68th with a market share of 0.04 among 122 lenders who reported 16,211 loans originated or purchased.

OREGON

Eugene-Springfield MSA

The AA consists of Lane County in the central portion of Oregon and stretches to the coastline. No changes were made to the AA since the previous evaluation. The AA consists of 0 low-, 23 moderate-, 44 middle- and 23 upper-income CTs. Three CTs have no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Eugene-Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	0.0	24.7	47.3	24.7	3.2
Population by Geography	382,971	0.0	24.7	49.5	24.2	1.7
Housing Units by Geography	163,617	0.0	26.4	47.0	24.3	2.3
Owner-Occupied Units by Geography	91,385	0.0	18.8	53.8	26.9	0.5
Occupied Rental Units by Geography	63,131	0.0	37.0	36.8	21.3	4.8
Vacant Units by Geography	9,101	0.0	28.8	49.5	19.4	2.3
Businesses by Geography	49,428	0.0	26.9	45.9	24.8	2.5
Farms by Geography	2,083	0.0	18.8	58.5	22.0	0.7
Family Distribution by Income Level	90,434	21.4	16.9	21.4	40.3	0.0
Household Distribution by Income Level	154,516	24.4	16.3	16.7	42.5	0.0
Median Family Income MSA - 21660 Eugene-Springfield, OR MSA		\$72,092	Median Housing Value			\$283,501
			Median Gross Rent			\$1,032
			Families Below Poverty Level			9.3%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 14 financial institutions operated 55 full-service branches within the AA. Of these institutions, BB ranked 6th, with 8.5 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 26th with a market share of 0.9 percent among 0.9 lenders who reported 31,833 loans. In 2022, BB ranked 17th with a market share of 1.5 percent among 402 lenders who reported 17,940 loans. In 2023, BB ranked 14th with a market share of 1.6 percent among 333 lenders who reported 11,545 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 10th with a market share of 3.7 percent among 95 lenders who reported 7,296 loans. In

2022, BB ranked 14th with a market share of 1.4 percent among 74 lenders who reported 6,893 loans. In 2023, BB ranked 9th with a market share of 1.6 percent among 69 lenders who reported 3,583 loans.

Medford-Grants Pass CSA

The AA is in Jackson and Josephine Counties in the southwestern portion of Oregon. No changes were made to the AA since the previous evaluation. The AA consists of 1 low-, 14 moderate-, 41 middle- and 17 upper-income CTs. One CT has no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Medford-Grants Pass CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	1.4	18.9	55.4	23.0	1.4
Population by Geography	311,349	0.7	20.2	57.3	21.0	0.8
Housing Units by Geography	135,680	0.7	20.9	56.2	21.3	0.9
Owner-Occupied Units by Geography	82,838	0.1	17.7	56.7	24.5	0.9
Occupied Rental Units by Geography	43,458	1.6	27.4	56.4	14.1	0.5
Vacant Units by Geography	9,384	1.2	18.4	50.6	26.5	3.3
Businesses by Geography	48,706	4.1	17.1	54.8	23.4	0.7
Farms by Geography	2,776	1.3	11.8	60.2	24.7	2.0
Family Distribution by Income Level	81,715	20.1	19.0	20.8	40.2	0.0
Household Distribution by Income Level	126,296	24.2	15.8	18.1	41.9	0.0
Median Family Income MSA - 24420 Grants Pass, OR MSA		\$57,003	Median Housing Value			\$300,658
Median Family Income MSA - 32780 Medford, OR MSA		\$70,436	Median Gross Rent			\$1,043
			Families Below Poverty Level			9.4%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 12 financial institutions operated 64 full-service branches within the AA. Of these institutions, BB ranked 5th, with a 7.9 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 22nd with a market share of 1.3 percent among 398 lenders who reported 27,620 loans. In 2022, BB ranked 16th with a market share of 1.5 percent among 401 lenders who reported 15,486 loans. In 2023, BB ranked 17th with a market share of 1.4 percent among 325 lenders who reported 9,357 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 9th with a market share of 4.0 percent among 87 lenders who reported 7,148 loans. In 2022, BB ranked 11th with a market share of 1.7 percent among 78 lenders who reported 6,622 loans. In 2023, BB ranked 10th with a market share of 1.4 percent among 81 lenders who reported 3,332 loans.

IDAHO

Coeur d'Alene MSA

The AA is in northern Idaho along the Washington border and consists of Kootenai County. BB exited the AA in June 2022, with the sale of its sole branch. Analysis is based on performance for 2021 and the applicable portion of 2022. The AA consists of 0 low-, 8 moderate-, 20 middle- and 11 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: Coeur d’Alene MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	20.5	51.3	28.2	0.0
Population by Geography	171,362	0.0	16.1	63.1	20.8	0.0
Housing Units by Geography	72,799	0.0	20.0	55.9	24.2	0.0
Owner-Occupied Units by Geography	45,958	0.0	14.1	60.9	25.0	0.0
Occupied Rental Units by Geography	18,517	0.0	30.5	55.6	13.9	0.0
Vacant Units by Geography	8,324	0.0	29.0	28.4	42.6	0.0
Businesses by Geography	32,360	0.0	19.0	57.1	23.9	0.0
Farms by Geography	1,032	0.0	15.6	56.7	27.7	0.0
Family Distribution by Income Level	44,873	19.2	19.2	22.1	39.6	0.0
Household Distribution by Income Level	64,475	21.0	17.9	21.7	39.4	0.0
Median Family Income MSA - 17660 Coeur d'Alene, ID MSA		\$72,376	Median Housing Value			\$303,446
			Median Gross Rent			\$1,030
			Families Below Poverty Level			7.4%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2022, FDIC Deposit Market Share Data, 29 financial institutions operated 36 full-service branches within the AA. Of these institutions, BB ranked 11th, with a 0.9 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB

ranked 36th with a market share of 0.5 percent among 377 lenders who reported 23,568 loans. In 2022, BB ranked 33rd with a market share of 0.6 percent among 341 lenders who reported 12,277 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 18th with a market share of 0.7 percent among 79 lenders who reported 4,906 loans. In 2022, BB ranked 21st with a market share of 0.4 percent among 73 lenders who reported 5,122 loans.

Idaho Non-MSA

The AA is in the north-central portion of Idaho, between Washington and Montana and is comprised of Benewah, Clearwater and Latah Counties, which are not part of any larger MSA. No changes were made to the AA since the previous evaluation. The AA consists of 0 low-, 1 moderate-, 9 middle- and 4 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: Idaho Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	7.1	64.3	28.6	0.0
Population by Geography	57,781	0.0	8.1	58.0	33.9	0.0
Housing Units by Geography	26,517	0.0	8.5	58.4	33.1	0.0
Owner-Occupied Units by Geography	14,041	0.0	8.3	65.9	25.8	0.0
Occupied Rental Units by Geography	8,807	0.0	5.6	41.5	52.9	0.0
Vacant Units by Geography	3,669	0.0	16.2	70.5	13.2	0.0
Businesses by Geography	7,159	0.0	8.9	53.6	37.5	0.0
Farms by Geography	576	0.0	4.9	76.7	18.4	0.0
Family Distribution by Income Level	12,991	15.6	16.2	23.2	45.0	0.0
Household Distribution by Income Level	22,848	24.0	17.3	19.0	39.7	0.0
Median Family Income Non-MSAs - ID		\$62,532	Median Housing Value			\$220,195
			Median Gross Rent			\$753
			Families Below Poverty Level			7.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 7 financial institutions operated 12 full-service branches within the AA. Of these institutions, BB ranked 3rd, with a 19.8 percent deposit market share.

The following notes BB’s market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 10th with a market share of 2.4 percent among 183 lenders who reported 3,548 loans. In 2022, BB ranked 9th with a market share of 2.6 percent among 178 lenders who reported 2,243 loans. In 2023, BB ranked 9th with a market share of 2.7 percent among 160 lenders who reported 1,470 loans.

The following notes BB’s market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 3rd with a market share of 9.5 percent among 45 lenders who reported 1,204 loans. In 2022, BB ranked 6th with a market share of 6.0 percent among 47 lenders who reported 1,080 loans. In 2023, BB ranked 5th with a market share of 5.9 percent among 41 lenders who reported 540 loans.

Twin Falls MSA

The AA consists of Twin Falls County, located in southern Idaho along the border with Nevada. No changes were made to the AA since the previous evaluation. The AA consists of 0 low-, 3 moderate-, 12 middle- and 2 upper-income CTs.

Demographic Information of the Assessment Area						
Assessment Area: Twin Falls MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	17.6	70.6	11.8	0.0
Population by Geography	90,046	0.0	13.7	72.6	13.7	0.0
Housing Units by Geography	33,785	0.0	15.6	72.8	11.6	0.0
Owner-Occupied Units by Geography	22,107	0.0	11.4	74.8	13.7	0.0
Occupied Rental Units by Geography	9,651	0.0	26.1	66.9	7.0	0.0
Vacant Units by Geography	2,027	0.0	11.7	77.7	10.6	0.0
Businesses by Geography	12,305	0.0	18.1	65.5	16.4	0.0
Farms by Geography	886	0.0	6.4	82.8	10.7	0.0
Family Distribution by Income Level	21,932	18.4	18.1	22.6	40.9	0.0
Household Distribution by Income Level	31,758	21.7	17.9	20.1	40.2	0.0
Median Family Income MSA - 46300 Twin Falls, ID MSA		\$62,242	Median Housing Value			\$189,261
			Median Gross Rent			\$831
			Families Below Poverty Level			9.0%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to June 30, 2024, FDIC Deposit Market Share Data, 12 financial institutions operated 27 full-service branches within the AA. Of these institutions, BB ranked 7th, with a 2.9 percent deposit market share.

The following notes BB's market share by number of home mortgage loans originated or purchased during the review period according to Peer Mortgage Data for the applicable years: In 2021, BB ranked 77th with a market share of 0.1 percent among 245 lenders who reported 8,886 loans. In 2022, BB ranked 45th with a market share of 0.1 percent among 235 lenders who reported 5,686 loans. In 2023, BB ranked 47th with a market share of 0.2 percent among 197 lenders who reported 3,865 loans.

The following notes BB's market share by number of small business loans originated or purchased during the review period according to Peer Small Business Data for the applicable years: In 2021, BB ranked 14th with a market share of 1.1 percent among 60 lenders who reported 2,008 loans. In 2022, BB ranked 17th with a market share of 0.9 percent among 55 lenders who reported 1,875 loans. In 2023, BB ranked 14th with a market share of 0.7 percent among 59 lenders who reported 900 loans.

GEOGRAPHIC DISTRIBUTION AND BORROWER PROFILE TABLES OF THE LIMITED-SCOPE ASSESSMENT AREAS

Kennewick-Richland-Walla Walls CSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Kennewick-Richland-Walla Walls CSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	1.7	1.4	10	2.4	1,675	1.5
2022	0.8	0.8	1	0.3	236	0.3
2023	0.8	0.7	0	0.0	0	0.0
Moderate						
2021	22.1	19.1	77	18.5	15,979	14.4
2022	20.5	18.4	68	22.8	11,275	15.8
2023	20.5	18.0	34	21.4	7,666	15.4
Middle						
2021	40.7	38.3	209	50.2	60,416	54.6
2022	44.1	42.2	154	51.7	35,045	49.1
2023	44.1	43.2	81	50.9	18,287	36.8
Upper						
2021	35.5	41.1	120	28.8	32,566	29.4
2022	34.4	38.4	75	25.2	24,843	34.8
2023	34.4	37.9	44	27.7	23,787	47.8
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.2	0.2	0	0.0	0	0.0
2023	0.2	0.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	416	100.0	110,637	100.0
2022	100.0	100.0	298	100.0	71,398	100.0
2023	100.0	100.0	159	100.0	49,741	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Kennewick-Richland-Walla Walla CSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.0	2.1	25	4.9	5,569	8.8
2022	2.1	2.4	5	2.1	1,127	2.1
2023	2.0	2.1	5	3.3	390	1.4
Moderate						
2021	25.4	26.0	108	21.1	10,615	16.7
2022	26.8	27.5	102	43.6	24,422	46.2
2023	26.5	24.4	52	34.2	11,108	40.9
Middle						
2021	41.6	40.6	258	50.4	30,716	48.4
2022	41.3	39.9	83	35.5	17,282	32.7
2023	41.2	42.9	60	39.5	8,277	30.5
Upper						
2021	30.6	30.9	119	23.2	16,261	25.6
2022	28.9	29.1	39	16.7	9,729	18.4
2023	29.3	29.4	34	22.4	7,383	27.2
Not Available						
2021	0.3	0.3	2	0.4	314	0.5
2022	0.9	1.2	5	2.1	310	0.6
2023	1.0	1.2	1	0.7	20	0.1
Totals						
2021	100.0	100.0	512	100.0	63,475	100.0
2022	100.0	100.0	234	100.0	52,870	100.0
2023	100.0	100.0	152	100.0	27,178	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Kennewick- Richland-Walla Walla CSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	21.6	4.7	28	6.7	3,252	2.9
2022	19.9	4.7	32	10.7	1,848	2.6
2023	19.9	4.8	8	5.0	955	1.9
Moderate						
2021	17.2	15.6	68	16.3	14,011	12.7
2022	18.3	16.0	50	16.8	8,966	12.6
2023	18.3	17.3	25	15.7	5,131	10.3
Middle						
2021	19.9	24.3	99	23.8	23,415	21.2
2022	20.6	26.3	72	24.2	17,237	24.1
2023	20.6	28.2	36	22.6	9,139	18.4
Upper						
2021	41.2	40.0	185	44.5	52,313	47.3
2022	41.2	42.2	128	43.0	39,091	54.8
2023	41.2	37.1	72	45.3	19,238	38.7
Not Available						
2021	0.0	15.3	36	8.7	17,645	15.9
2022	0.0	10.9	16	5.4	4,255	6.0
2023	0.0	12.7	18	11.3	15,278	30.7
Totals						
2021	100.0	100.0	416	100.0	110,636	100.0
2022	100.0	100.0	298	100.0	71,398	100.0
2023	100.0	100.0	159	100.0	49,741	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Kennewick-Richland-Walla Walla CSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	87.0	48.7	345	67.4	24,796	39.1
2022	89.5	52.7	127	54.3	15,592	29.5
2023	89.8	52.6	69	45.4	7,442	27.4
>\$1,000,000						
2021	3.3	--	166	32.4	38,659	60.9
2022	2.5	--	107	45.7	37,278	70.5
2023	2.4	--	82	53.9	19,696	72.5
Revenue Not Available						
2021	9.7	--	1	0.2	20	0.0
2022	7.9	--	0	0.0	0	0.0
2023	7.9	--	1	0.7	40	0.1
Totals						
2021	100.0	100.0	512	100.0	63,475	100.0
2022	100.0	100.0	234	100.0	52,870	100.0
2023	100.0	100.0	152	100.0	27,178	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Bellingham MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Bellingham MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	1.0	1.2	3	1.1	2,491	2.3
2022	0.1	0.1	1	0.5	3,600	5.4
2023	0.1	0.2	0	0.0	0	0.0
Moderate						
2021	4.1	4.5	10	3.8	5,310	4.9
2022	14.6	16.5	21	11.4	5,681	8.5
2023	14.6	17.3	17	14.7	5,499	13.7
Middle						
2021	77.8	80.3	228	86.0	91,800	84.7
2022	54.9	56.8	97	52.7	32,295	48.5
2023	54.9	56.9	68	58.6	25,470	63.6
Upper						
2021	17.0	13.9	24	9.1	8,763	8.1
2022	29.2	25.4	62	33.7	24,229	36.4
2023	29.2	24.3	30	25.9	9,020	22.5
Not Available						
2021	0.1	0.2	0	0.0	0	0.0
2022	1.2	1.1	3	1.6	810	1.2
2023	1.2	1.2	1	0.9	50	0.1
Totals						
2021	100.0	100.0	265	100.0	108,364	100.0
2022	100.0	100.0	184	100.0	66,614	100.0
2023	100.0	100.0	116	100.0	40,040	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Bellingham MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	1.7	1.3	4	1.4	40	0.1
2022	5.2	4.7	4	4.1	214	1.6
2023	4.9	3.7	2	2.7	125	1.3
Moderate						
2021	5.3	5.7	14	4.8	3,102	10.8
2022	14.5	14.4	19	19.4	1,985	14.5
2023	14.4	13.9	6	8.1	1,302	13.6
Middle						
2021	72.3	74.2	225	77.9	21,924	76.0
2022	52.7	53.4	53	54.1	8,764	64.1
2023	53.2	57.1	51	68.9	6,629	69.0
Upper						
2021	15.3	13.8	30	10.4	2,326	8.1
2022	25.3	25.0	22	22.4	2,701	19.8
2023	25.2	23.1	15	20.3	1,551	16.1
Not Available						
2021	5.4	5.0	16	5.5	1,461	5.1
2022	2.3	2.4	0	0.0	0	0.0
2023	2.3	2.2	0	0.0	0	0.0
Totals						
2021	100.0	100.0	289	100.0	28,853	100.0
2022	100.0	100.0	98	100.0	13,664	100.0
2023	100.0	100.0	74	100.0	9,607	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Bellingham MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	20.8	3.2	8	3.0	1,027	0.9
2022	19.0	5.3	7	3.8	1,098	1.6
2023	19.0	4.4	5	4.3	224	0.6
Moderate						
2021	17.1	13.3	43	16.2	7,258	6.7
2022	18.9	14.6	23	12.5	5,484	8.2
2023	18.9	13.4	20	17.2	3,379	8.4
Middle						
2021	22.5	22.9	60	22.6	15,251	14.1
2022	23.2	24.2	45	24.5	11,193	16.8
2023	23.2	24.1	28	24.1	7,910	19.8
Upper						
2021	39.6	47.8	140	52.8	48,734	45.0
2022	38.9	45.5	103	56.0	43,749	65.7
2023	38.9	47.3	62	53.4	24,322	60.7
Not Available						
2021	0.0	12.7	14	5.3	36,094	33.3
2022	0.0	10.4	6	3.3	5,090	7.6
2023	0.0	10.8	1	0.9	4,205	10.5
Totals						
2021	100.0	100.0	265	100.0	108,364	100.0
2022	100.0	100.0	184	100.0	66,614	100.0
2023	100.0	100.0	116	100.0	40,040	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Bellingham MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	90.1	45.0	190	65.7	9,629	33.4
2022	92.0	50.8	56	57.1	3,887	28.4
2023	92.2	53.5	45	60.8	4,085	42.5
>\$1,000,000						
2021	3.5	--	99	34.3	19,224	66.6
2022	2.7	--	42	42.9	9,777	71.6
2023	2.5	--	29	39.2	5,522	57.5
Revenue Not Available						
2021	6.4	--	0	0.0	0	0.0
2022	5.3	--	0	0.0	0	0.0
2023	5.3	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	289	100.0	28,853	100.0
2022	100.0	100.0	98	100.0	13,664	100.0
2023	100.0	100.0	74	100.0	9,607	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Spokane-Spokane Valley MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Spokane-Spokane Valley MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.1	0.1	1	0.2	10	0.0
2022	1.7	2.4	10	2.4	1,001	1.0
2023	1.9	2.3	3	1.6	338	0.5
Moderate						
2021	20.7	22.3	145	24.9	21,603	16.4
2022	18.6	21.6	87	21.0	14,360	14.0
2023	16.7	19.5	28	15.1	4,369	6.8
Middle						
2021	47.5	44.3	258	44.3	53,538	40.6
2022	49.1	46.1	197	47.5	50,848	49.4
2023	48.6	47.0	98	52.7	37,997	59.0
Upper						
2021	31.4	32.9	177	30.4	56,590	42.9
2022	30.6	29.8	121	29.2	36,685	35.7
2023	32.7	31.0	57	30.6	21,655	33.6
Not Available						
2021	0.3	0.4	1	0.2	279	0.2
2022	0.1	0.1	0	0.0	0	0.0
2023	0.1	0.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	582	100.0	132,020	100.0
2022	100.0	100.0	415	100.0	102,893	100.0
2023	100.0	100.0	186	100.0	64,359	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Spokane-Spokane Valley MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.8	2.4	7	1.2	804	1.0
2022	1.1	1.1	4	1.5	1,508	3.1
2023	1.1	1.2	2	1.5	25	0.1
Moderate						
2021	34.9	31.1	209	36.0	33,543	43.7
2022	25.4	27.1	96	35.2	20,323	42.0
2023	24.0	23.9	49	36.3	11,712	37.6
Middle						
2021	36.8	40.2	266	45.8	34,005	44.3
2022	34.6	40.5	131	48.0	21,691	44.9
2023	33.9	39.6	65	48.1	15,978	51.3
Upper						
2021	24.7	25.6	94	16.2	7,918	10.3
2022	21.6	24.4	35	12.8	3,753	7.8
2023	22.5	26.6	17	12.6	2,381	7.6
Not Available						
2021	0.9	0.7	5	0.9	500	0.7
2022	17.4	6.9	7	2.6	1,055	2.2
2023	18.4	8.8	2	1.5	1,035	3.3
Totals						
2021	100.0	100.0	581	100.0	76,770	100.0
2022	100.0	100.0	273	100.0	48,330	100.0
2023	100.0	100.0	135	100.0	31,131	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Spokane-Spokane Valley MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	20.7	4.8	52	8.9	3,239	2.5
2022	19.6	5.7	25	6.0	1,675	1.6
2023	19.3	4.8	12	6.5	1,028	1.6
Moderate						
2021	17.1	15.8	101	17.4	14,527	11.0
2022	18.6	17.6	77	18.6	10,651	10.4
2023	18.5	16.2	29	15.6	3,600	5.6
Middle						
2021	22.1	22.7	130	22.3	23,770	18.0
2022	21.5	23.7	72	17.3	13,837	13.4
2023	21.3	24.6	29	15.6	5,174	8.0
Upper						
2021	40.1	40.2	260	44.7	79,275	60.0
2022	40.3	40.6	224	54.0	70,973	69.0
2023	40.9	41.0	110	59.1	37,274	57.9
Not Available						
2021	0.0	16.6	39	6.7	11,210	8.5
2022	0.0	12.3	17	4.1	5,758	5.6
2023	0.0	13.3	6	3.2	17,282	26.9
Totals						
2021	100.0	100.0	582	100.0	132,020	100.0
2022	100.0	100.0	415	100.0	102,893	100.0
2023	100.0	100.0	186	100.0	64,359	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Spokane-Spokane Valley MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	88.3	51.9	394	67.8	31,913	41.6
2022	91.2	54.2	171	62.6	22,573	46.7
2023	91.3	55.7	61	45.2	9,381	30.1
>\$1,000,000						
2021	3.5	--	185	31.8	44,645	58.2
2022	2.6	--	102	37.4	25,757	53.3
2023	2.4	--	73	54.1	21,730	69.8
Revenue Not Available						
2021	8.2	--	2	0.3	212	0.3
2022	6.3	--	0	0.0	0	0.0
2023	6.3	--	1	0.7	20	0.1
Totals						
2021	100.0	100.0	581	100.0	76,770	100.0
2022	100.0	100.0	273	100.0	48,330	100.0
2023	100.0	100.0	135	100.0	31,131	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Washington Non-MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Washington Non-MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	1.3	2.4	2	1.1	130	0.2
2022	0.5	0.7	0	0.0	0	0.0
2023	0.5	0.6	0	0.0	0	0.0
Moderate						
2021	4.2	4.0	16	8.7	14,928	27.3
2022	10.4	8.6	9	6.6	1,896	5.6
2023	10.4	10.0	4	4.3	2,225	5.3
Middle						
2021	71.1	70.4	118	64.1	26,638	48.7
2022	55.8	59.6	81	59.1	19,558	57.6
2023	55.8	57.1	52	56.5	13,089	31.3
Upper						
2021	23.3	23.2	48	26.1	12,970	23.7
2022	33.2	31.0	47	34.3	12,529	36.9
2023	33.2	32.2	36	39.1	26,488	63.4
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.1	0.1	0	0.0	0	0.0
2023	0.1	0.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	184	100.0	54,666	100.0
2022	100.0	100.0	137	100.0	33,983	100.0
2023	100.0	100.0	92	100.0	41,803	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Washington Non-MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	3.0	1.5	3	0.8	1,236	3.5
2022	1.5	0.4	1	0.7	304	1.2
2023	1.5	1.0	2	1.6	362	2.2
Moderate						
2021	5.0	6.3	23	6.4	2,913	8.3
2022	12.6	11.9	13	9.6	3,503	14.4
2023	12.7	13.2	7	5.5	1,810	11.0
Middle						
2021	70.3	70.1	265	73.4	23,674	67.7
2022	54.3	56.6	91	67.4	16,759	68.8
2023	54.2	55.8	87	68.0	10,258	62.4
Upper						
2021	21.7	22.0	70	19.4	7,121	20.4
2022	31.2	30.7	30	22.2	3,805	15.6
2023	31.2	29.7	32	25.0	4,020	24.4
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.5	0.3	0	0.0	0	0.0
2023	0.4	0.4	0	0.0	0	0.0
Totals						
2021	100.0	100.0	361	100.0	34,944	100.0
2022	100.0	100.0	135	100.0	24,371	100.0
2023	100.0	100.0	128	100.0	16,450	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Washington Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	21.3	3.1	13	7.1	750	1.4
2022	21.9	4.3	8	5.8	619	1.8
2023	21.9	4.1	7	7.6	628	1.5
Moderate						
2021	17.9	12.7	21	11.4	3,343	6.1
2022	16.5	15.4	16	11.7	1,924	5.7
2023	16.5	15.2	13	14.1	1,485	3.6
Middle						
2021	20.5	22.6	45	24.5	9,638	17.6
2022	20.1	23.3	33	24.1	5,814	17.1
2023	20.1	23.4	15	16.3	2,137	5.1
Upper						
2021	40.2	48.0	90	48.9	26,241	48.0
2022	41.4	44.6	74	54.0	24,210	71.2
2023	41.4	45.1	49	53.3	19,887	47.6
Not Available						
2021	0.0	13.6	15	8.2	14,694	26.9
2022	0.0	12.4	6	4.4	1,417	4.2
2023	0.0	12.2	8	8.7	17,667	42.3
Totals						
2021	100.0	100.0	184	100.0	54,666	100.0
2022	100.0	100.0	137	100.0	33,983	100.0
2023	100.0	100.0	92	100.0	41,803	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Washington Non-MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	85.9	58.4	282	78.1	17,277	49.4
2022	88.7	56.9	75	55.6	7,452	30.6
2023	88.9	58.0	65	50.8	3,195	19.4
>\$1,000,000						
2021	3.0	--	77	21.3	17,601	50.4
2022	2.2	--	60	44.4	16,919	69.4
2023	2.0	--	63	49.2	13,255	80.6
Revenue Not Available						
2021	11.2	--	2	0.6	66	0.2
2022	9.1	--	0	0.0	0	0.0
2023	9.1	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	361	100.0	34,944	100.0
2022	100.0	100.0	135	100.0	24,371	100.0
2023	100.0	100.0	128	100.0	16,450	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Yakima MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Yakima MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.2	0.3	5	3.9	1,090	3.5
2023	0.2	0.2	1	1.3	50	0.4
Moderate						
2021	17.6	12.7	21	9.9	9,630	17.3
2022	16.2	16.2	21	16.3	3,966	12.7
2023	16.2	16.2	14	18.4	1,569	11.3
Middle						
2021	41.2	40.2	93	43.9	19,372	34.8
2022	35.5	30.3	37	28.7	10,074	32.2
2023	35.5	30.6	20	26.3	2,940	21.2
Upper						
2021	41.3	47.1	98	46.2	26,729	48.0
2022	48.1	53.3	66	51.2	16,179	51.7
2023	48.1	53.0	41	53.9	9,284	67.1
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	212	100.0	55,731	100.0
2022	100.0	100.0	129	100.0	31,309	100.0
2023	100.0	100.0	76	100.0	13,843	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Yakima MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	6.2	5.7	6	3.4	970	2.9
2023	6.1	5.8	19	12.4	1,981	6.6
Moderate						
2021	27.0	25.5	128	30.5	16,036	32.3
2022	21.5	21.8	45	25.1	7,514	22.4
2023	21.4	23.7	36	23.5	6,884	23.1
Middle						
2021	39.4	41.3	173	41.2	22,646	45.5
2022	30.4	33.0	59	33.0	11,784	35.1
2023	30.4	33.7	44	28.8	11,264	37.8
Upper						
2021	33.6	33.2	119	28.3	11,036	22.2
2022	41.9	39.4	69	38.5	13,312	39.6
2023	42.1	36.8	54	35.3	9,677	32.5
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	420	100.0	49,718	100.0
2022	100.0	100.0	179	100.0	33,580	100.0
2023	100.0	100.0	153	100.0	29,806	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Yakima-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	20.2	3.0	10	4.7	626	1.1
2022	20.3	5.1	7	5.4	585	1.9
2023	20.3	3.4	3	3.9	177	1.3
Moderate						
2021	18.1	12.7	31	14.6	4,506	8.1
2022	18.5	15.2	15	11.6	2,030	6.5
2023	18.5	13.4	9	11.8	686	5.0
Middle						
2021	20.6	23.2	36	17.0	6,423	11.5
2022	21.6	24.4	25	19.4	4,657	14.9
2023	21.6	24.2	11	14.5	1,685	12.2
Upper						
2021	41.1	46.1	119	56.1	33,242	59.6
2022	39.6	41.6	78	60.5	22,488	71.8
2023	39.6	43.9	50	65.8	10,647	76.9
Not Available						
2021	0.0	15.0	16	7.5	10,935	19.6
2022	0.0	13.7	4	3.1	1,549	4.9
2023	0.0	15.1	3	3.9	649	4.7
Totals						
2021	100.0	100.0	212	100.0	55,731	100.0
2022	100.0	100.0	129	100.0	31,309	100.0
2023	100.0	100.0	76	100.0	13,843	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Yakima MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	84.1	51.7	275	65.5	15,421	31.0
2022	87.0	57.6	97	54.2	11,057	32.9
2023	87.4	58.5	78	51.0	8,035	27.0
>\$1,000,000						
2021	4.6	--	144	34.3	34,162	68.7
2022	3.6	--	81	45.3	22,414	66.7
2023	3.3	--	74	48.4	21,741	72.9
Revenue Not Available						
2021	11.3	--	1	0.2	135	0.3
2022	9.4	--	1	0.6	109	0.3
2023	9.3	--	1	0.7	30	0.1
Totals						
2021	100.0	100.0	420	100.0	49,718	100.0
2022	100.0	100.0	179	100.0	33,580	100.0
2023	100.0	100.0	153	100.0	29,806	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

California Non-MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: California Non-MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	7.2	6.1	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	25.2	16.6	8	18.2	773	12.4
2022	52.6	51.7	24	63.2	3,745	67.9
2023	52.6	53.5	18	52.9	4,209	63.1
Middle						
2021	67.6	77.3	36	81.8	5,447	87.6
2022	47.4	48.3	14	36.8	1,770	32.1
2023	47.4	46.5	16	47.1	2,459	36.9
Upper						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	44	100.0	6,219	100.0
2022	100.0	100.0	38	100.0	5,515	100.0
2023	100.0	100.0	34	100.0	6,668	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: California Non-MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	14.5	16.3	6	12.8	174	5.1
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	21.0	19.1	11	23.4	1,167	34.2
2022	62.6	61.6	10	62.5	880	71.0
2023	62.0	57.6	13	59.1	442	33.1
Middle						
2021	64.4	64.6	30	63.8	2,070	60.7
2022	37.4	38.4	6	37.5	359	29.0
2023	38.0	42.4	9	40.9	894	66.9
Upper						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	47	100.0	3,411	100.0
2022	100.0	100.0	16	100.0	1,239	100.0
2023	100.0	100.0	22	100.0	1,336	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: California Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	29.9	5.2	6	13.6	667	10.7
2022	26.0	9.1	3	7.9	330	6.0
2023	26.0	6.4	2	5.9	163	2.4
Moderate						
2021	19.8	16.3	10	22.7	1,153	18.5
2022	23.1	20.3	9	23.7	867	15.7
2023	23.1	19.1	4	11.8	613	9.2
Middle						
2021	19.3	22.6	11	25.0	1,319	21.2
2022	19.0	24.1	10	26.3	1,454	26.4
2023	19.0	23.6	11	32.4	1,250	18.8
Upper						
2021	31.1	40.7	14	31.8	2,680	43.1
2022	31.9	35.1	14	36.8	2,460	44.6
2023	31.9	37.6	16	47.1	4,298	64.5
Not Available						
2021	0.0	15.2	3	6.8	400	6.4
2022	0.0	11.4	2	5.3	404	7.3
2023	0.0	13.2	1	2.9	344	5.2
Totals						
2021	100.0	100.0	44	100.0	6,219	100.0
2022	100.0	100.0	38	100.0	5,515	100.0
2023	100.0	100.0	34	100.0	6,668	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: California Non-MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	83.3	48.7	39	83.0	1,554	45.6
2022	84.5	54.4	15	93.8	1,039	83.9
2023	85.5	59.1	15	68.2	462	34.6
>\$1,000,000						
2021	3.5	--	7	14.9	1,847	54.1
2022	3.2	--	1	6.3	200	16.1
2023	2.9	--	7	31.8	874	65.4
Revenue Not Available						
2021	13.2	--	1	2.1	10	0.3
2022	12.4	--	0	0.0	0	0.0
2023	11.6	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	47	100.0	3,411	100.0
2022	100.0	100.0	16	100.0	1,239	100.0
2023	100.0	100.0	22	100.0	1,336	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Chico MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Chico MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.9	1.5	0	0.0	0	0.0
2022	2.8	3.7	0	0.0	0	0.0
2023	2.8	4.0	0	0.0	0	0.0
Moderate						
2021	20.3	17.7	5	18.5	1,282	3.3
2022	15.1	16.7	7	21.9	14,768	45.6
2023	15.1	17.3	2	22.2	826	37.5
Middle						
2021	51.6	42.2	11	40.7	35,983	91.8
2022	46.7	42.1	13	40.6	14,272	44.1
2023	46.7	42.8	1	11.1	608	27.5
Upper						
2021	27.2	38.7	11	40.7	1,949	5.0
2022	35.4	37.6	12	37.5	3,347	10.3
2023	35.4	36.0	6	66.7	772	35.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	27	100.0	39,214	100.0
2022	100.0	100.0	32	100.0	32,386	100.0
2023	100.0	100.0	9	100.0	2,206	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Chico MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	1.5	1.1	0	0.0	0	0.0
2022	6.5	5.0	1	4.8	161	3.0
2023	6.6	5.3	0	0.0	0	0.0
Moderate						
2021	27.4	25.6	5	20.8	1,061	34.6
2022	20.4	19.7	2	9.5	705	13.3
2023	20.2	19.4	3	16.7	50	2.1
Middle						
2021	43.6	39.6	11	45.8	1,241	40.5
2022	39.0	36.6	8	38.1	2,840	53.6
2023	39.2	34.7	5	27.8	573	24.5
Upper						
2021	27.4	33.7	8	33.3	761	24.8
2022	34.1	38.7	10	47.6	1,594	30.1
2023	34.0	40.6	10	55.6	1,715	73.4
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	24	100.0	3,063	100.0
2022	100.0	100.0	21	100.0	5,300	100.0
2023	100.0	100.0	18	100.0	2,338	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Chico MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	22.9	3.1	0	0.0	0	0.0
2022	24.9	6.7	1	3.1	40	0.1
2023	24.9	5.0	0	0.0	0	0.0
Moderate						
2021	16.7	11.7	3	11.1	145	0.4
2022	15.2	17.0	2	6.3	498	1.5
2023	15.2	17.2	0	0.0	0	0.0
Middle						
2021	19.0	20.9	2	7.4	439	1.1
2022	18.1	24.5	4	12.5	833	2.6
2023	18.1	23.4	1	11.1	40	1.8
Upper						
2021	41.4	49.2	20	74.1	4,743	12.1
2022	41.8	38.3	20	62.5	5,274	16.3
2023	41.8	37.4	8	88.9	2,166	98.2
Not Available						
2021	0.0	15.1	2	7.4	33,887	86.4
2022	0.0	13.5	5	15.6	25,740	79.5
2023	0.0	17.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	27	100.0	39,214	100.0
2022	100.0	100.0	32	100.0	32,386	100.0
2023	100.0	100.0	9	100.0	2,206	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Chico MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	87.2	49.8	19	79.2	1,623	53.0
2022	88.0	57.5	13	61.9	2,413	45.5
2023	88.6	60.2	8	44.4	523	22.4
>\$1,000,000						
2021	3.8	--	5	20.8	1,440	47.0
2022	3.4	--	8	38.1	2,887	54.5
2023	3.1	--	10	55.6	1,815	77.6
Revenue Not Available						
2021	9.1	--	0	0.0	0	0.0
2022	8.6	--	0	0.0	0	0.0
2023	8.2	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	24	100.0	3,063	100.0
2022	100.0	100.0	21	100.0	5,300	100.0
2023	100.0	100.0	18	100.0	2,338	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Redding-Red Bluff CSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Redding-Red Bluff CSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	20.9	18.8	16	27.6	2,887	21.2
2022	25.8	23.2	24	37.5	3,929	33.6
2023	25.8	24.6	10	30.3	4,959	41.6
Middle						
2021	58.4	56.6	40	69.0	9,630	70.8
2022	49.8	52.1	21	32.8	4,420	37.8
2023	49.8	50.1	13	39.4	2,677	22.5
Upper						
2021	20.7	24.6	2	3.4	1,080	7.9
2022	24.5	24.7	19	29.7	3,358	28.7
2023	24.5	25.4	10	30.3	4,285	35.9
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	58	100.0	13,598	100.0
2022	100.0	100.0	64	100.0	11,707	100.0
2023	100.0	100.0	33	100.0	11,921	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Redding-Red Bluff CSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	23.5	20.6	33	43.4	3,282	42.6
2022	18.2	22.9	19	45.2	3,958	54.3
2023	18.4	21.9	15	50.0	1,694	34.2
Middle						
2021	61.2	61.9	39	51.3	3,709	48.1
2022	67.0	54.7	20	47.6	2,792	38.3
2023	66.3	54.9	13	43.3	1,485	30.0
Upper						
2021	15.3	17.5	4	5.3	717	9.3
2022	14.8	22.4	3	7.1	544	7.5
2023	15.3	23.2	2	6.7	1,775	35.8
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	76	100.0	7,708	100.0
2022	100.0	100.0	42	100.0	7,294	100.0
2023	100.0	100.0	30	100.0	4,954	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Redding-Red Bluff CSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	22.5	4.2	3	5.2	262	1.9
2022	22.7	7.8	7	10.9	584	5.0
2023	22.7	4.6	2	6.1	205	1.7
Moderate						
2021	18.8	14.6	10	17.2	2,135	15.7
2022	17.7	19.0	6	9.4	546	4.7
2023	17.7	14.6	3	9.1	209	1.8
Middle						
2021	19.6	22.7	2	3.4	555	4.1
2022	20.1	23.9	16	25.0	3,142	26.8
2023	20.1	23.0	7	21.2	1,531	12.8
Upper						
2021	39.2	40.1	40	69.0	10,099	74.3
2022	39.5	31.8	33	51.6	7,261	62.0
2023	39.5	37.2	20	60.6	6,976	58.5
Not Available						
2021	0.0	18.3	3	5.2	547	4.0
2022	0.0	17.4	2	3.1	174	1.5
2023	0.0	20.6	1	3.0	3,000	25.2
Totals						
2021	100.0	100.0	58	100.0	13,598	100.0
2022	100.0	100.0	64	100.0	11,707	100.0
2023	100.0	100.0	33	100.0	11,921	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Redding-Red Bluff CSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	87.6	51.6	49	64.5	2,300	29.8
2022	90.0	54.1	18	42.9	1,693	23.2
2023	90.6	56.9	14	46.7	2,771	55.9
>\$1,000,000						
2021	3.6	--	27	35.5	5,408	70.2
2022	2.8	--	24	57.1	5,601	76.8
2023	2.6	--	16	53.3	2,183	44.1
Revenue Not Available						
2021	8.8	--	0	0.0	0	0.0
2022	7.3	--	0	0.0	0	0.0
2023	6.8	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	76	100.0	7,708	100.0
2022	100.0	100.0	42	100.0	7,294	100.0
2023	100.0	100.0	30	100.0	4,954	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Sacramento-Roseville CSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Sacramento-Roseville CSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	4.6	5.1	6	6.5	2,360	4.1
2022	3.8	4.3	6	5.0	1,334	2.8
2023	3.8	4.2	2	3.5	321	1.6
Moderate						
2021	18.9	17.1	14	15.2	8,691	15.3
2022	18.1	18.7	13	10.9	7,840	16.7
2023	18.1	17.4	6	10.5	1,549	7.6
Middle						
2021	33.8	31.2	26	28.3	27,531	48.3
2022	37.6	33.5	44	37.0	13,622	29.0
2023	37.6	32.4	20	35.1	6,216	30.4
Upper						
2021	42.7	46.5	46	50.0	18,404	32.3
2022	40.3	43.3	56	47.1	24,200	51.5
2023	40.3	45.8	29	50.9	12,366	60.5
Not Available						
2021	0.0	0.1	0	0.0	0	0.0
2022	0.2	0.2	0	0.0	0	0.0
2023	0.2	0.3	0	0.0	0	0.0
Totals						
2021	100.0	100.0	92	100.0	56,985	100.0
2022	100.0	100.0	119	100.0	46,995	100.0
2023	100.0	100.0	57	100.0	20,452	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Sacramento-Roseville CSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	9.1	8.5	30	10.3	5,989	11.7
2022	8.3	7.7	18	8.7	6,176	10.3
2023	8.0	7.1	13	8.2	3,669	9.5
Moderate						
2021	23.6	21.2	94	32.3	18,652	36.3
2022	24.1	19.7	43	20.8	17,562	29.4
2023	27.7	21.3	26	16.4	7,767	20.1
Middle						
2021	29.1	29.0	61	21.0	10,651	20.7
2022	31.3	32.2	78	37.7	18,964	31.8
2023	29.8	30.6	73	45.9	19,415	50.2
Upper						
2021	36.3	40.3	97	33.3	13,750	26.8
2022	34.6	39.4	66	31.9	15,768	26.4
2023	32.9	40.1	47	29.6	7,814	20.2
Not Available						
2021	1.8	1.1	9	3.1	2,325	4.5
2022	1.7	1.0	2	1.0	1,229	2.1
2023	1.5	0.8	0	0.0	0	0.0
Totals						
2021	100.0	100.0	291	100.0	51,367	100.0
2022	100.0	100.0	207	100.0	59,699	100.0
2023	100.0	100.0	159	100.0	38,665	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Sacramento-Roseville CSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	23.8	4.2	2	2.2	333	0.6
2022	23.1	4.8	1	0.8	288	0.6
2023	23.1	3.7	2	3.5	388	1.9
Moderate						
2021	16.5	13.7	13	14.1	2,553	4.5
2022	16.7	13.4	6	5.0	2,071	4.4
2023	16.7	13.0	4	7.0	549	2.7
Middle						
2021	18.2	22.8	15	16.3	4,690	8.2
2022	19.1	22.3	23	19.3	5,413	11.5
2023	19.1	22.3	17	29.8	4,068	19.9
Upper						
2021	41.5	44.4	50	54.3	21,845	38.3
2022	41.1	45.5	82	68.9	31,987	68.1
2023	41.1	42.4	32	56.1	14,647	71.6
Not Available						
2021	0.0	14.9	12	13.0	27,565	48.4
2022	0.0	13.9	7	5.9	7,236	15.4
2023	0.0	18.5	2	3.5	800	3.9
Totals						
2021	100.0	100.0	92	100.0	56,985	100.0
2022	100.0	100.0	119	100.0	46,995	100.0
2023	100.0	100.0	57	100.0	20,452	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Sacramento-Roseville CSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	88.8	48.1	134	46.0	10,265	20.0
2022	90.5	55.3	125	60.4	28,103	47.1
2023	91.7	57.6	80	50.3	16,185	41.9
>\$1,000,000						
2021	3.3	--	156	53.6	40,801	79.4
2022	2.7	--	82	39.6	31,596	52.9
2023	2.3	--	79	49.7	22,480	58.1
Revenue Not Available						
2021	7.9	--	1	0.3	301	0.6
2022	6.8	--	0	0.0	0	0.0
2023	5.9	--	0	0.0	0	0.0
2021	100.0	100.0	291	100.0	51,367	100.0
2022	100.0	100.0	207	100.0	59,699	100.0
2023	100.0	100.0	159	100.0	38,665	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

San Diego-Chula Vista-Carlsbad MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: San Diego-Chula Vista-Carlsbad MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.8	2.8	8	3.2	4,553	5.5
2022	2.4	2.4	8	2.9	1,628	2.1
2023	2.4	2.9	4	3.3	315	0.3
Moderate						
2021	15.1	14.2	43	17.1	16,771	20.2
2022	15.8	15.6	35	12.6	9,064	11.6
2023	15.8	16.6	23	19.2	2,976	2.8
Middle						
2021	35.5	34.0	93	37.1	21,026	25.3
2022	37.2	37.6	109	39.4	25,057	31.9
2023	37.2	36.9	31	25.8	33,142	31.7
Upper						
2021	46.6	49.0	107	42.6	40,659	49.0
2022	44.4	44.1	124	44.8	42,650	54.4
2023	44.4	43.4	61	50.8	67,932	65.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.2	0.2	1	0.4	68	0.1
2023	0.2	0.2	1	0.8	100	0.1
Totals						
2021	100.0	100.0	251	100.0	83,010	100.0
2022	100.0	100.0	277	100.0	78,468	100.0
2023	100.0	100.0	120	100.0	104,465	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: San Diego-Chula Vista-Carlsbad MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	5.6	5.2	57	12.0	6,645	11.2
2022	3.8	3.4	13	8.3	3,673	9.2
2023	3.8	3.4	7	5.3	969	3.7
Moderate						
2021	14.7	14.3	68	14.3	9,360	15.8
2022	17.7	16.7	39	24.8	13,223	33.2
2023	17.4	16.2	37	28.0	11,285	43.2
Middle						
2021	34.7	34.6	173	36.3	23,674	40.0
2022	34.0	34.2	54	34.4	12,283	30.9
2023	34.2	34.0	45	34.1	7,356	28.2
Upper						
2021	44.9	45.9	171	35.9	17,994	30.4
2022	43.7	44.9	49	31.2	9,925	24.9
2023	43.7	45.8	40	30.3	6,230	23.9
Not Available						
2021	0.1	0.1	7	1.5	1,467	2.5
2022	0.8	0.7	2	1.3	686	1.7
2023	0.9	0.6	3	2.3	275	1.1
Totals						
2021	100.0	100.0	476	100.0	59,140	100.0
2022	100.0	100.0	157	100.0	39,790	100.0
2023	100.0	100.0	132	100.0	26,115	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: San Diego-Chula Vista-Carlsbad MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	23.6	3.1	6	2.4	704	0.8
2022	22.8	4.3	2	0.7	381	0.5
2023	22.8	2.6	4	3.3	270	0.3
Moderate						
2021	16.9	9.4	9	3.6	2,216	2.7
2022	17.3	8.8	13	4.7	883	1.1
2023	17.3	6.8	6	5.0	880	0.8
Middle						
2021	17.8	18.4	42	16.7	7,732	9.3
2022	18.7	18.5	48	17.3	6,888	8.8
2023	18.7	16.9	23	19.2	2,634	2.5
Upper						
2021	41.7	49.9	181	72.1	53,559	64.5
2022	41.2	53.7	211	76.2	69,761	88.9
2023	41.2	49.3	82	68.3	15,983	15.3
Not Available						
2021	0.0	19.2	13	5.2	18,799	22.6
2022	0.0	14.7	3	1.1	555	0.7
2023	0.0	24.4	5	4.2	84,698	81.1
Totals						
2021	100.0	100.0	251	100.0	83,010	100.0
2022	100.0	100.0	277	100.0	78,468	100.0
2023	100.0	100.0	120	100.0	104,465	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: San Diego-Chula Vista-Carlsbad MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	90.1	46.4	291	61.1	13,870	23.5
2022	91.2	52.3	71	45.2	9,848	24.8
2023	91.8	54.7	60	45.5	6,408	24.5
>\$1,000,000						
2021	3.7	--	184	38.7	44,679	75.5
2022	3.1	--	86	54.8	29,942	75.3
2023	2.8	--	72	54.5	19,707	75.5
Revenue Not Available						
2021	6.3	--	1	0.2	591	1.0
2022	5.7	--	0	0.0	0	0.0
2023	5.3	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	476	100.0	59,140	100.0
2022	100.0	100.0	157	100.0	39,790	100.0
2023	100.0	100.0	132	100.0	26,115	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Santa Rosa-Petaluma MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Santa Rosa-Petaluma MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	18.6	19.8	2	40.0	52,168	97.1
Middle						
2021	55.1	55.0	1	20.0	778	1.4
Upper						
2021	26.3	25.2	2	40.0	759	1.4
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	5	100.0	53,705	100.0
Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Santa Rosa-Petaluma MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	27.8	26.7	1	16.7	285	58.5
Middle						
2021	47.1	47.6	5	83.3	202	41.5
Upper						
2021	25.1	25.8	0	0.0	0	0.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	6	100.0	487	100.0
Source: 2021 D&B Data; Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021 CRA Data: Loan Type is Small Business Loans. 2021 Peer Small Business Data -- US and PR: Loan Type is Small Business.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Santa Rosa-Petaluma MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	21.3	4.9	0	0.0	0	0.0
Moderate						
2021	18.0	14.0	1	20.0	51	0.1
Middle						
2021	19.5	22.9	0	0.0	0	0.0
Upper						
2021	41.2	46.9	2	40.0	1,485	2.8
Not Available						
2021	0.0	11.3	2	40.0	52,168	97.1
Totals						
2021	100.0	100.0	5	100.0	53,705	100.0
Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Santa Rosa-Petaluma MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	88.8	43.9	3	50.0	20	4.1
>\$1,000,000						
2021	4.3	--	3	50.0	467	95.9
Revenue Not Available						
2021	6.9	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	6	100.0	487	100.0
Source: 2021 D&B Data; Bank Data; 2021 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021 CRA Data; Loan Type is Small Business Loans. 2021 Peer Small Business Data -- US and PR: Loan Type is Small Business.						

Eugene-Springfield MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Eugene-Springfield MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.9	1.1	2	1.1	1,855	4.4
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	16.9	17.1	56	29.9	8,686	20.4
2022	18.8	19.3	37	24.5	9,127	23.4
2023	18.8	19.5	20	20.8	3,038	12.0
Middle						
2021	57.2	57.7	100	53.5	24,173	56.8
2022	53.8	52.5	85	56.3	19,760	50.7
2023	53.8	53.3	62	64.6	19,361	76.5
Upper						
2021	25.0	24.1	29	15.5	7,818	18.4
2022	26.9	27.3	28	18.5	9,579	24.6
2023	26.9	26.5	13	13.5	2,309	9.1
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.5	0.9	1	0.7	508	1.3
2023	0.5	0.7	1	1.0	590	2.3
Totals						
2021	100.0	100.0	187	100.0	42,531	100.0
2022	100.0	100.0	151	100.0	38,973	100.0
2023	100.0	100.0	96	100.0	25,297	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Eugene-Springfield MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	5.1	5.3	10	3.7	1,281	4.5
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	23.0	25.1	82	30.3	8,768	30.6
2022	27.1	27.4	30	29.7	3,251	29.0
2023	26.9	26.4	30	33.0	4,083	41.3
Middle						
2021	48.6	47.6	151	55.7	13,680	47.7
2022	45.5	47.0	53	52.5	4,311	38.4
2023	45.9	47.7	44	48.4	2,651	26.8
Upper						
2021	23.3	22.0	28	10.3	4,965	17.3
2022	24.8	23.6	18	17.8	3,650	32.6
2023	24.8	24.2	17	18.7	3,149	31.9
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	2.5	2.1	0	0.0	0	0.0
2023	2.5	1.8	0	0.0	0	0.0
Totals						
2021	100.0	100.0	271	100.0	28,694	100.0
2022	100.0	100.0	101	100.0	11,212	100.0
2023	100.0	100.0	91	100.0	9,883	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Eugene-Springfield MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	21.4	4.2	14	7.5	1,349	3.2
2022	21.4	5.5	13	8.6	1,192	3.1
2023	21.4	4.8	9	9.4	744	2.9
Moderate						
2021	17.8	15.0	44	23.5	6,321	14.9
2022	16.9	17.2	31	20.5	4,709	12.1
2023	16.9	14.2	27	28.1	3,446	13.6
Middle						
2021	20.5	24.3	39	20.9	7,473	17.6
2022	21.4	25.2	27	17.9	5,227	13.4
2023	21.4	25.3	21	21.9	3,451	13.6
Upper						
2021	40.3	42.8	77	41.2	21,494	50.5
2022	40.3	41.8	77	51.0	24,708	63.4
2023	40.3	44.2	33	34.4	8,559	33.8
Not Available						
2021	0.0	13.7	13	7.0	5,894	13.9
2022	0.0	10.2	3	2.0	3,137	8.0
2023	0.0	11.6	6	6.3	9,096	36.0
Totals						
2021	100.0	100.0	187	100.0	42,531	100.0
2022	100.0	100.0	151	100.0	38,973	100.0
2023	100.0	100.0	96	100.0	25,297	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Eugene-Springfield MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	89.3	52.8	204	75.3	13,918	48.5
2022	90.7	54.6	63	62.4	5,068	45.2
2023	91.5	58.5	59	64.8	3,479	35.2
>\$1,000,000						
2021	3.5	--	67	24.7	14,776	51.5
2022	2.9	--	38	37.6	6,144	54.8
2023	2.6	--	32	35.2	6,404	64.8
Revenue Not Available						
2021	7.3	--	0	0.0	0	0.0
2022	6.4	--	0	0.0	0	0.0
2023	5.9	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	271	100.0	28,694	100.0
2022	100.0	100.0	101	100.0	11,212	100.0
2023	100.0	100.0	91	100.0	9,883	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Medford-Grants Pass CSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Medford-Grants Pass CSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.1	0.1	1	0.4	633	0.5
2022	0.1	0.2	0	0.0	0	0.0
2023	0.1	0.2	0	0.0	0	0.0
Moderate						
2021	10.6	12.2	55	24.7	44,859	34.4
2022	17.7	18.0	28	19.3	7,146	12.2
2023	17.7	18.2	7	10.9	9,175	16.5
Middle						
2021	61.2	57.3	111	49.8	60,814	46.6
2022	56.7	57.3	82	56.6	39,071	66.7
2023	56.7	58.2	44	68.8	44,304	79.7
Upper						
2021	28.1	30.3	56	25.1	24,205	18.5
2022	24.5	23.7	35	24.1	12,339	21.1
2023	24.5	22.2	13	20.3	2,131	3.8
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.9	0.8	0	0.0	0	0.0
2023	0.9	1.1	0	0.0	0	0.0
Totals						
2021	100.0	100.0	223	100.0	130,510	100.0
2022	100.0	100.0	145	100.0	58,555	100.0
2023	100.0	100.0	64	100.0	55,611	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Medford-Grants Pass CSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	3.9	4.0	20	6.9	2,344	7.0
2022	4.0	3.5	10	8.8	3,147	15.5
2023	4.1	2.7	2	2.0	375	2.3
Moderate						
2021	15.9	15.1	66	22.7	5,716	17.1
2022	17.1	16.0	26	22.8	3,801	18.8
2023	17.1	17.1	27	26.7	7,250	44.5
Middle						
2021	56.5	56.0	146	50.2	20,757	62.2
2022	55.3	56.1	63	55.3	10,563	52.2
2023	54.8	56.0	59	58.4	6,286	38.6
Upper						
2021	23.7	24.8	59	20.3	4,555	13.6
2022	23.0	23.8	15	13.2	2,738	13.5
2023	23.4	23.6	13	12.9	2,369	14.6
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.7	0.5	0	0.0	0	0.0
2023	0.7	0.5	0	0.0	0	0.0
Totals						
2021	100.0	100.0	291	100.0	33,372	100.0
2022	100.0	100.0	114	100.0	20,249	100.0
2023	100.0	100.0	101	100.0	16,280	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Medford-Grants Pass CSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	20.6	4.4	8	3.6	1,162	0.9
2022	20.1	4.8	10	6.9	1,226	2.1
2023	20.1	4.0	0	0.0	0	0.0
Moderate						
2021	18.5	15.2	24	10.8	3,762	2.9
2022	19.0	14.2	27	18.6	4,503	7.7
2023	19.0	12.8	8	12.5	554	1.0
Middle						
2021	19.6	23.4	55	24.7	12,186	9.3
2022	20.8	23.5	29	20.0	5,273	9.0
2023	20.8	23.7	15	23.4	2,382	4.3
Upper						
2021	41.2	40.5	96	43.0	28,647	22.0
2022	40.2	43.6	60	41.4	22,991	39.3
2023	40.2	43.4	31	48.4	6,921	12.4
Not Available						
2021	0.0	16.5	40	17.9	84,753	64.9
2022	0.0	13.9	19	13.1	24,562	41.9
2023	0.0	16.1	10	15.6	45,754	82.3
Totals						
2021	100.0	100.0	223	100.0	130,510	100.0
2022	100.0	100.0	145	100.0	58,555	100.0
2023	100.0	100.0	64	100.0	55,610	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Medford-Grants Pass CSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	91.0	50.0	190	65.3	13,443	40.3
2022	92.2	56.1	52	45.6	7,934	39.2
2023	92.8	57.1	47	46.5	6,105	37.5
>\$1,000,000						
2021	2.8	--	101	34.7	19,929	59.7
2022	2.3	--	62	54.4	12,315	60.8
2023	2.1	--	54	53.5	10,175	62.5
Revenue Not Available						
2021	6.2	--	0	0.0	0	0.0
2022	5.5	--	0	0.0	0	0.0
2023	5.1	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	291	100.0	33,372	100.0
2022	100.0	100.0	114	100.0	20,249	100.0
2023	100.0	100.0	101	100.0	16,280	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Coeur d'Alene MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Coeur d'Alene MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	12.8	15.2	8	10.0	2,905	12.1
2022	14.1	12.3	6	10.9	3,140	15.4
Middle						
2021	72.0	71.8	65	81.3	17,973	74.6
2022	60.9	66.0	33	60.0	10,330	50.6
Upper						
2021	15.3	13.0	7	8.8	3,203	13.3
2022	25.0	21.7	16	29.1	6,950	34.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	80	100.0	24,081	100.0
2022	100.0	100.0	55	100.0	20,420	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Coeur d'Alene MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	20.7	18.6	8	20.5	2,275	27.5
2022	19.8	18.0	6	27.3	989	21.7
Middle						
2021	65.8	69.1	30	76.9	5,702	68.9
2022	55.3	56.3	12	54.5	3,239	71.1
Upper						
2021	13.5	12.3	1	2.6	300	3.6
2022	24.8	25.7	4	18.2	325	7.1
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	39	100.0	8,277	100.0
2022	100.0	100.0	22	100.0	4,553	100.0
Source: 2021, 2022 D&B Data; Bank Data; 2021, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Coeur d'Alene MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	18.0	2.7	1	1.3	78	0.3
2022	19.2	5.0	2	3.6	220	1.1
Moderate						
2021	20.3	10.7	6	7.5	1,194	5.0
2022	19.2	11.8	2	3.6	447	2.2
Middle						
2021	22.7	20.5	20	25.0	4,265	17.7
2022	22.1	22.0	5	9.1	1,192	5.8
Upper						
2021	39.0	50.5	49	61.3	17,900	74.3
2022	39.6	49.1	43	78.2	17,264	84.5
Not Available						
2021	0.0	15.6	4	5.0	643	2.7
2022	0.0	12.1	3	5.5	1,297	6.3
Totals						
2021	100.0	100.0	80	100.0	24,081	100.0
2022	100.0	100.0	55	100.0	20,420	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Coeur d'Alene MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	92.3	55.3	19	48.7	2,322	28.1
2022	93.6	56.5	15	68.2	3,169	69.6
2023	--	--	--	--	--	--
>\$1,000,000						
2021	2.5	--	20	51.3	5,955	71.9
2022	2.0	--	7	31.8	1,384	30.4
2023	--	--	--	--	--	--
Revenue Not Available						
2021	5.2	--	0	0.0	0	0.0
2022	4.4	--	0	0.0	0	0.0
2023	--	--	--	--	--	--
Totals						
2021	100.0	100.0	39	100.0	8,277	100.0
2022	100.0	100.0	22	100.0	4,553	100.0
2023	--	--	--	--	--	--
Source: 2021, 2022 D&B Data; Bank Data; 2021, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 CRA Data: Loan Type is Small Business Loans.						

Idaho Non-MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Idaho Non-MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	0.0	0.0	0	0.0	0	0.0
2022	8.3	9.6	1	2.8	40	0.5
2023	8.3	8.0	3	15.0	285	5.7
Middle						
2021	71.7	67.1	32	71.1	6,902	64.2
2022	65.9	57.5	26	72.2	6,357	79.9
2023	65.9	61.4	13	65.0	3,467	69.3
Upper						
2021	28.3	32.9	13	28.9	3,855	35.8
2022	25.8	32.9	9	25.0	1,562	19.6
2023	25.8	30.6	4	20.0	1,250	25.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	45	100.0	10,757	100.0
2022	100.0	100.0	36	100.0	7,958	100.0
2023	100.0	100.0	20	100.0	5,002	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Idaho Non-MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	0.0	0.0	0	0.0	0	0.0
2022	8.4	11.5	13	20.0	1,285	18.4
2023	8.9	11.2	15	27.3	1,701	28.0
Middle						
2021	76.9	78.3	104	90.4	7,863	85.2
2022	53.2	54.1	36	55.4	4,554	65.3
2023	53.6	54.1	31	56.4	3,520	57.9
Upper						
2021	23.1	21.7	11	9.6	1,371	14.8
2022	38.4	34.4	16	24.6	1,134	16.3
2023	37.5	34.8	9	16.4	862	14.2
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	115	100.0	9,234	100.0
2022	100.0	100.0	65	100.0	6,973	100.0
2023	100.0	100.0	55	100.0	6,083	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Idaho Non-MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	17.3	2.2	0	0.0	0	0.0
2022	15.6	3.4	1	2.8	50	0.6
2023	15.6	5.2	1	5.0	25	0.5
Moderate						
2021	17.4	11.0	4	8.9	404	3.8
2022	16.2	13.4	8	22.2	1,216	15.3
2023	16.2	15.4	4	20.0	566	11.3
Middle						
2021	20.9	20.8	11	24.4	2,087	19.4
2022	23.2	22.5	7	19.4	783	9.8
2023	23.2	24.2	3	15.0	387	7.7
Upper						
2021	44.4	50.9	27	60.0	7,476	69.5
2022	45.0	50.9	19	52.8	5,840	73.4
2023	45.0	47.2	10	50.0	3,254	65.1
Not Available						
2021	0.0	15.1	3	6.7	791	7.4
2022	0.0	9.8	1	2.8	70	0.9
2023	0.0	8.0	2	10.0	771	15.4
Totals						
2021	100.0	100.0	45	100.0	10,757	100.0
2022	100.0	100.0	36	100.0	7,958	100.0
2023	100.0	100.0	20	100.0	5,002	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Idaho Non-MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	87.1	63.3	86	74.8	4,197	45.5
2022	88.9	56.1	39	60.0	1,861	26.7
2023	89.9	59.8	32	58.2	2,492	41.0
>\$1,000,000						
2021	3.1	--	29	25.2	5,037	54.5
2022	2.6	--	26	40.0	5,112	73.3
2023	2.3	--	23	41.8	3,591	59.0
Revenue Not Available						
2021	9.8	--	0	0.0	0	0.0
2022	8.5	--	0	0.0	0	0.0
2023	7.8	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	115	100.0	9,234	100.0
2022	100.0	100.0	65	100.0	6,973	100.0
2023	100.0	100.0	55	100.0	6,083	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 and 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 and 2023 CRA Data: Loan Type is Small Business Loans.						

Twin Falls MSA

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Twin Falls MSA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	2.6	2.7	0	0.0	0	0.0
2022	11.4	11.9	4	50.0	4,091	84.4
2023	11.4	11.3	0	0.0	0	0.0
Middle						
2021	84.7	86.5	5	71.4	769	52.9
2022	74.8	70.7	3	37.5	658	13.6
2023	74.8	72.1	6	100.0	14,744	100.0
Upper						
2021	12.7	10.8	2	28.6	684	47.1
2022	13.7	17.4	1	12.5	100	2.1
2023	13.7	16.6	0	0.0	0	0.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	7	100.0	1,453	100.0
2022	100.0	100.0	8	100.0	4,849	100.0
2023	100.0	100.0	6	100.0	14,744	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans						
Assessment Area: Twin Falls MSA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Moderate						
2021	8.6	9.0	1	4.5	16	0.3
2022	18.6	17.7	1	5.6	1,000	13.3
2023	18.1	18.0	3	27.3	300	12.1
Middle						
2021	77.3	75.7	19	86.4	5,142	90.1
2022	65.1	62.9	12	66.7	5,396	71.7
2023	65.5	63.3	5	45.5	2,075	83.8
Upper						
2021	14.1	15.2	2	9.1	551	9.7
2022	16.2	19.3	5	27.8	1,125	15.0
2023	16.4	18.7	3	27.3	100	4.0
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2021	100.0	100.0	22	100.0	5,709	100.0
2022	100.0	100.0	18	100.0	7,521	100.0
2023	100.0	100.0	11	100.0	2,475	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 CRA Data: Loan Type is Small Business Loans.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: Twin Falls MSA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	18.5	4.6	2	28.6	190	13.1
2022	18.4	6.7	1	12.5	100	2.1
2023	18.4	4.4	0	0.0	0	0.0
Moderate						
2021	18.3	17.9	1	14.3	242	16.7
2022	18.1	19.2	0	0.0	0	0.0
2023	18.1	16.5	2	33.3	356	2.4
Middle						
2021	22.2	23.9	1	14.3	356	24.5
2022	22.6	26.2	2	25.0	330	6.8
2023	22.6	28.7	0	0.0	0	0.0
Upper						
2021	41.0	40.7	2	28.6	478	32.9
2022	40.9	39.6	4	50.0	819	16.9
2023	40.9	41.9	2	33.3	740	5.0
Not Available						
2021	0.0	12.8	1	14.3	186	12.8
2022	0.0	8.4	1	12.5	3,600	74.2
2023	0.0	8.5	2	33.3	13,648	92.6
Totals						
2021	100.0	100.0	7	100.0	1,453	100.0
2022	100.0	100.0	8	100.0	4,849	100.0
2023	100.0	100.0	6	100.0	14,744	100.0
Source: 2015 ACS; 2020 U.S. Census, Bank Data, 2021, 2022 and 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: Twin Falls MSA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2021	88.0	56.4	14	63.6	1,361	23.8
2022	89.4	58.4	7	38.9	843	11.2
2023	90.3	56.7	7	63.6	425	17.2
>\$1,000,000						
2021	2.9	--	8	36.4	4,348	76.2
2022	2.5	--	11	61.1	6,678	88.8
2023	2.2	--	4	36.4	2,050	82.8
Revenue Not Available						
2021	9.1	--	0	0.0	0	0.0
2022	8.1	--	0	0.0	0	0.0
2023	7.4	--	0	0.0	0	0.0
Totals						
2021	100.0	100.0	22	100.0	5,709	100.0
2022	100.0	100.0	18	100.0	7,521	100.0
2023	100.0	100.0	11	100.0	2,475	100.0
Source: 2021, 2022 and 2023 D&B Data; Bank Data; 2021, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2021, 2022 CRA Data: Loan Type is Small Business Loans.						

GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.