PUBLIC DISCLOSURE

December 8, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of the Sierra
Certificate Number: 22597

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Porterville, California 93257

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

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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 COMMUNITY REINVESTMENT ACT (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 (AA), including low- and moderate-income (LMI) 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 <u>High Satisfactory.</u>

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

- The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

The Investment Test is rated <u>Outstanding.</u>

- 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.

- The institution exhibits good responsiveness to credit and CD needs.

- The institution makes significant use of innovative and/or complex investments to support CD initiatives.

The Service Test is rated <u>Outstanding.</u>

- Delivery systems are accessible to essentially all portions of the institution's AAs.

- 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.

- Services, including where appropriate, business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals.

- The institution is a leader in providing CD services.

DESCRIPTION OF INSTITUTION

Bank of the Sierra (BOTS) is a California (CA) state-chartered institution headquartered in Porterville, CA. The bank is a wholly owned subsidiary of Sierra Bancorp. The institution does not have any banking-related affiliate or subsidiary relationships relevant to this CRA Performance Evaluation (PE). The bank did not participate in any mergers or acquisitions since the previous evaluation. At the previous FDIC CRA PE dated August 15, 2022, BOTS received a Satisfactory rating based on Interagency Large Institution CRA Examination Procedures.

As of the current evaluation date, BOTS operates 34 branches across CA's central valley, central coast, and southern portion of the state. During the evaluation period, BOTS closed one branch in the Tulare AA. No new branches were opened during the evaluation period. BOTS continues to operate a loan production office in Templeton, CA. The bank opened an additional loan production office in Templeton, CA in October 2022 and closed its Roseville, CA loan production office in December 2024.

The institution offers commercial, farm, and consumer financial products and services. The bank's primary lending focus remains commercial lending. BOTS commercial and farm loan product offerings include commercial real estate, Small Business Administration (SBA), lines of credit, credit cards, agriculture, mortgage warehouse financing, and commercial and industrial lending. The bank offers consumer products: installment, personal lines of credit, overdraft lines of credit, credit cards, and automobile loans. As of May 2025, the bank ceased offering consumer residential home equity lines of credit. The bank offers deposit products for both consumers and businesses, including checking, savings, money market, and certificates of deposit. BOTS offers the following types of retail services to all customers: online banking, electronic bill pay, electronic statements, telephone banking, and mobile banking and wallets.

As of the September 30, 2025 Reports of Condition and Income, BOTS had approximately $2.9 billion in total deposits and $3.7 billion in total assets, including $2.5 billion in total loans and $891.5 million in total securities. The distribution of the bank's loan portfolio is shown in the following table.

Loan Portfolio Distribution as of 09/30/2025		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	13,420	0.5
Secured by Farmland	67,860	2.7
Secured by 1-4 Family Residential Properties	364,277	14.6
Secured by Multifamily (5 or more) Residential Properties	129,824	5.2
Secured by Nonfarm Nonresidential Properties	1,274,857	51.2
Total Real Estate Loans	**1,850,238**	**74.2**
Commercial and Industrial Loans	114,989	4.6
Agricultural Production and Other Loans to Farmers	68,697	2.8
Consumer Loans	2,910	0.1
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	454,955	18.3
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	**2,491,789**	**100.0**
Source: Reports of Condition and Income		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the credit needs of its AAs.

DESCRIPTION OF ASSESSMENT AREAS

Since the prior CRA evaluation, BOTS AAs delineation has remained unchanged. The bank continues to designate seven AAs across the state of CA. Since the previous evaluation, the Census Bureau released updated 2020 U.S. Census data, which affected census tract (CT) income designations and the total number of CTs within each of the bank's AAs. Refer to the individual AA sections for specific changes and further detail.

In July 2023, the Office of Management and Budget released revised delineations of MSAs/MDs and applied to CRA data collected and reported on or after January 1, 2024. The MSA revisions changed MSA names, MSA numbers, and shifted counties to different MSAs or non-MSAs. The shift of counties updated demographic and median family income data. From the 2024 Office of Management and Budget revisions, two of the bank's seven AAs were affected, as discussed below.

- The Bakersfield, CA MSA #12540 name changed to Bakersfield-Delano, CA MSA #12540.
- The Fresno, CA MSA #23420 was modified to add Madera County and the associated CTs.

Based on the updated 2020 U.S. Census data, the following table details the banks' AAs, counties, number of CTs, and branches located within each AA.

Description of Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Tulare AA	Tulare	103	11
Kern AA	Kern	236	7
Fresno AA	Fresno	225	6
San Luis Obispo AA	San Luis Obispo	70	3
Ventura AA	Ventura	190	4
Kings AA	Kings	31	1
Santa Barbara AA	Santa Barbara	109	2
Source: Bank Data			

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the previous evaluation dated August 15, 2022, to the current evaluation dated December 8, 2025. Examiners used Interagency Large Institution Examination Procedures to evaluate BOTS CRA performance. Examiners relied on records provided by the bank, public financial information, demographic data, community contacts, and reported loan information.

For this evaluation, examiners reviewed the Tulare AA using full-scope examination procedures as the bank is headquartered in this AA and it is where the largest lending activities occurred, the most

branches are located, and the majority of deposits are held. To ensure that infrequently reviewed AAs are regularly evaluated, the Kern AA was randomly selected for a full-scope review. This AA was not reviewed using full-scope examination procedures in the previous two CRA evaluations. The remaining Fresno, San Luis Obispo, Ventura, Kings, and Santa Barbara AAs were reviewed using limited-scope review procedures.

The following table details BOTS's small business loans, small farm loans, deposits, and branches for each of the AAs.

Assessment Area Breakdown of Loans, Deposits, and Branches								
Assessment Area	**Small Business Loans**		**Small Farm Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**$(000s)**	**%**	**#**	**%**
Tulare AA	45,118	33.2	9,339	32.6	1,576,890	52.9	11	32.4
Kern AA	25,868	19.1	1,363	4.8	433,261	14.5	7	20.6
Fresno AA	20,211	14.9	2,381	8.3	305,948	10.3	6	17.6
San Luis Obispo AA	21,078	15.5	12,517	43.7	182,427	6.1	3	8.8
Ventura AA	10,039	7.4	300	1.0	323,999	10.9	4	11.8
Kings AA	11,114	8.2	1,155	4.0	108,135	3.6	1	2.9
Santa Barbara AA	2,341	1.7	1,575	5.5	52,394	1.8	2	5.9
Total	**135,769**	**100.0**	**28,630**	**100.0**	**2,983,054**	**100.0**	**34**	**100.0**
Source: Reported CRA loan data (2022 through 2024), Bank Data; FDIC Summary of Deposits (as of 6/30/2025)								

The table also reflects the AAs' weighting, from most to least weight in descending order, based on lending volumes, deposits, and branches. The AAs are presented in this order throughout the evaluation. The Tulare AA carries the most weight as it contains the highest levels of lending, deposits held, and number of branches.

Activities Reviewed

Examiners determined that BOTS' major product lines are small business and small farm loans. This conclusion primarily considered the bank's business strategy, loan portfolio composition, and the number and dollar volume of loans originated or purchased during the evaluation period. BOTS does not offer residential home mortgage loans and originates a nominal amount of consumer loans; therefore, these products were not considered major product lines and were excluded from the evaluation. Examiners determined that small business loans remain the bank's primary lending focus and as such received more weight for determining conclusions than small farm loans.

For the Lending Test, examiners reviewed the universe of small business and small farm loans originated or purchased from January 1, 2022, to December 31, 2024. During this timeframe, BOTS originated or purchased 759 small business loans totaling $147.0 million and 158 small farm loans totaling $29.2 million. While both number and dollar volume of loans are presented, examiners emphasized performance by number of loans because it is a better indicator of demand and impact of the number of businesses and farms served. Examiners compared the institution's lending performance

with the bank's previous evaluation; 2020 U.S. Census data; and 2022, 2023, and 2024 D&B and reported aggregate lending data. Examiners analyzed and presented all three years of small business and small farm lending data due to the lending volume fluctuations during the evaluation period.

The evaluation of CD lending, qualified investments, and CD services included all qualified activities since the date of the previous CRA PE through September 30, 2025. The evaluation of qualified investments also includes prior-period investments still outstanding at the time of this evaluation. The CD loans, qualified investments, and CD services were evaluated quantitatively based on the financial capacity of the bank as well as qualitatively based upon the impact to the bank's AAs.

For the Service Test, examiners reviewed the 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. Examiners also reviewed any retail banking products and services targeted toward LMI individuals or small businesses, including any activities tailored to meet specific needs within the AAs.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The overall Lending Test rating is "High Satisfactory." This rating is primarily supported by adequate lending activity, excellent AA concentration, good geographic distribution, poor borrower profile, being a leader in CD lending activities, use of innovative and/or flexible lending practices, and good responsiveness to credit needs of the most economically disadvantaged geographies, low-income individuals, and small businesses.

The overall Lending Test performance was consistent with the conclusions in the Kern, Fresno, and San Luis Obispo AAs; however, performance was inconsistent in the Tulare AA which exceeds the overall performance conclusion and performances in Ventura, Santa Barbara, and Kings AAs show below the overall conclusion. Refer to each AA section for details regarding the performance.

Lending Activity

BOTS lending levels reflect adequate responsiveness to AA credit needs. During the evaluation period, BOTS originated or purchased 725 small business loans totaling $135.8 million in the AAs. These figures represent a decrease by number and dollar volume when compared to the previous CRA PE levels of 2,713 small business loans totaling $301.7 million, respectively. The bank's decline in lending levels is primarily attributable to the ending of the SBA Paycheck Protection Program that was in effect from April 2020 to May 2021. During the prior evaluation, BOTS originated approximately 2,047 SBA Paycheck Protection Program loans totaling $156.4 million.

During the current evaluation, BOTS originated or purchased 155 small farm loans totaling $28.6 million in the AAs, which represents an increase from the previous PE amounts of 92 small farm loans totaling $17.8 million in the AAs.

BOTS current evaluation lending market share and relative market rank for small business and small farm lending can be found within the individual AA sections. Refer to each area for more information.

Assessment Area Concentration

BOTS originated a substantial majority of loans within its AAs during the evaluation period. Overall, 96.0 percent by number and 93.3 percent by dollar volume of loans were inside the bank's AAs. The bank's AA concentration exceeded the previous evaluation performance of 89.7 percent by number and 61.3 percent by dollar volume of loans inside the AAs. The following table shows the bank's AA lending for small business and small farm loans by year, number of loans, and dollar volumes.

Lending Inside and Outside of the Assessment Area										
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$(000s)**	**%**	**$(000s)**	**%**	
Small Business										
2022	290	94.5	17	5.5	307	47,854	87.1	7,083	12.9	54,937
2023	233	95.9	10	4.1	243	43,062	95.2	2,175	4.8	45,237
2024	202	96.7	7	3.3	209	44,853	95.8	1,975	4.2	46,828
Subtotal	**725**	**95.5**	**34**	**4.5**	**759**	**135,769**	**92.4**	**11,233**	**7.6**	**147,002**
Small Farm										
2022	38	100.0	0	0.0	38	6,775	100.0	0	0.0	6,775
2023	55	94.8	3	5.2	58	10,564	95.0	560	5.0	11,124
2024	62	100.0	0	0.0	62	11,291	100.0	0	0.0	11,291
Subtotal	**155**	**98.1**	**3**	**1.9**	**158**	**28,630**	**98.1**	**560**	**1.9**	**29,190**
Total	**880**	**96.0**	**37**	**4.0**	**917**	**164,399**	**93.3**	**11,793**	**6.7**	**176,192**

Source: Bank Data, as reported
Due to rounding, totals may not equal 100.0%.

Geographic Distribution

BOTS geographic distribution of loans reflects good penetration throughout the AAs. This conclusion is primarily supported by excellent performance in the Tulare AA and good performance in the Kern AA. Performance in the limited-scope Ventura AA, San Luis Obispo AA, and Kings AAs are consistent. Performance in the limited-scope Fresno and Santa Barbara AAs are below. Refer to the individual AAs analysis for more details.

Borrower Profile

The bank's borrower distribution reflects, given the product lines offered, poor penetration among business customers of different revenue sizes. This conclusion is primarily supported by adequate penetration in the Tulare AA and poor penetration in the Kern AA. The bank's performance varied in the limited-scope AAs: the Fresno AA is above; and the San Luis Obispo, Ventura, Kings, and Santa Barbara AAs are consistent. Refer to the individual AAs analysis for additional details.

Innovative or Flexible Lending Practices

BOTS uses innovative and/or flexible lending practices in order to serve the credit needs of its AAs. The bank continues to offer loan products and programs that serve the needs of small business and small farm loan borrowers. Overall, the institution participated in 536 innovative or flexible loans totaling $188.6 million during the evaluation period. The innovative and/or flexible lending programs are discussed below.

- Sierra Quick Biz: An unsecured line of credit targeted to existing small business and small farms customers in amounts ranging from $5,000 to $30,000 with a one-year term. The bank offers an online application and quick approval. During the evaluation period, the bank originated or renewed 269 loans totaling $3.5 million under this program.

- Sierra Business Reserve Line of Credit: An unsecured overdraft protection line of credit attached to a business checking account. The reserve line of credit offered ranges from $1,501 to $10,000 and is available to both farm and non-farm businesses. The bank originated or renewed 8 reserve lines totaling $90,000 during the evaluation period.

- Sierra Business Line of Credit: A flexible revolving line of credit available to both farm and non-farm businesses with loan amounts ranging from $30,000 up to $250,000. This line of credit typically provides working capital to support the trading cycle of the company. The line is attached to a business check account and can be used for overdraft protection. During the evaluation period, the bank originated or renewed 186 loans totaling $28.0 million.

- Sierra Small Business Term Loan: A flexible term loan with loan amounts ranging from $30,000 to $250,000 and terms from 12-to-60 months. The bank originated or renewed 53 loans totaling $5.3 million during the evaluation period.

- SBA Lending: BOTS continues to be a SBA Preferred Lender. This lender status gives the bank direct authority to make final credit decisions on SBA guaranteed loans, making the process faster for borrowers. The bank offers loans under both the SBA 7(a) and 504 loan programs. During the review period, the bank originated or renewed 14 SBA loans totaling $16.2 million.

- Mortgage Warehouse Facilities: A revolving line of credit extended to third-party mortgage loan originator entities to finance flexible mortgage lending options through repurchase

agreements. During the evaluation period, the bank extended lines of credit through two mortgage warehouse facility partnerships discussed below.

- The bank provided a $50.0 million annual line of credit to a homeownership CDFI designed to provide access to homeownership opportunities for underserved and underbanked LMI borrowers that may not qualify for conventional financing. From 2023 to 2025, the line of credit served an essential role in facilitating the funding and sale of approximately 200 affordable mortgage loans totaling $130.0 million in the state of CA.

- The bank made a $15.0 million annual line of credit to a Tribal Housing Authority. The entity is an intermediary that provides down payment assistance for LMI individuals and specialized experience in serving Native American communities, where conventional financing options are limited. From 2023 to 2025, approximately 206 mortgage loans totaling $4.7 million were made in the state of CA through this repurchase agreement partnership.

Innovative and flexible lending programs are offered institution-wide; therefore, these programs will not be presented in the individual AAs.

Community Development Loans

The institution is a leader in making CD loans. During the evaluation period, BOTS originated 117 CD loans totaling $237.5 million, representing 6.5 percent of average total assets and 10.8 percent of average total loans. On an annualized basis, CD loans increased 58.1 percent by number and 209.5 percent by dollar volume since the previous evaluation performance. The performance reflects a significant improvement compared to the previous evaluation where the bank originated 42 CD loans totaling $43.6 million, which represented 1.3 percent of average total assets and 2.0 percent of average total loans. When compared to institutions of similar size, geographic footprint, and business strategy, BOTS CD lending performance was slightly below two similarly situated institutions that were rated as leaders in making CD loans. Additionally, BOTS' performance exceeded two similarly situated institutions with a relatively high level of CD lending.

The CD lending performance throughout the AAs is not consistent. The performance in the Tulare, Kern, and San Luis Obispo AAs is consistent while the performance in the Fresno, Ventura, Kings, and Santa Barbara AAs is below. The Tulare AA and Kern AAs carry the most weight for conclusions and the overall rating. The following table details the bank's CD loans by AA and CD purpose.

Community Development Lending by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Tulare AA	2	1,825	6	20,550	16	37,105	2	8,100	26	67,580
Kern AA	2	2,107	4	23,675	16	27,335	0	0	22	53,117
Fresno AA	4	2,622	2	1,500	10	30,287	0	0	16	34,409
San Luis Obispo AA	1	100	0	0	21	33,823	3	12,809	25	46,732
Ventura AA	7	10,627	2	250	5	3,470	0	0	14	14,347
Kings AA	1	850	0	0	4	1,993	1	2,000	6	4,843
Santa Barbara AA	0	0	1	500	1	399	0	0	2	899
Statewide Activities	4	10,050	0	0	2	5,558	0	0	6	15,608
Total	**21**	**28,181**	**15**	**46,475**	**75**	**139,970**	**6**	**22,909**	**117**	**237,533**
Source: Bank Data										

As illustrated in the table above, BOTS also made 6 statewide loans totaling $15.6 million. These statewide loans did not have a purpose, mandate, or function that includes serving the AAs. As the institution exhibited a good record of responsiveness to the AAs' CD lending needs and opportunities, examiners also considered the CD loans that benefited the broader CA statewide area. The statewide loans did support CD throughout other areas of CA. Overall, the bank significantly improved its performance from the previous evaluation. BOTS also demonstrated good responsiveness to the needs and opportunities identified in most of the AAs by supporting economic development and community services.

The following are notable examples of CD loans that benefited the broader CA statewide area.

- In 2022, the bank originated a $3.0 million loan for the acquisition and renovation of a 24-unit multifamily complex in a low-income CT in Los Angeles County. This loan supports affordable housing as 17 of the 24 units in the complex will be affordable housing.

- In 2023, the bank refinanced a $3.0 million loan for property improvements secured by 11 apartment buildings with a total of 103 apartment units in Sacramento County. The loan is part of the CA Housing and Rehabilitation Program which stipulates that 94 of the 103 units must be affordable housing, including 35 units for very low-income and 59 units for low-income households. The loan supports affordable housing in Sacramento, CA.

Refer to each AA section for more information and notable examples.

INVESTMENT TEST

The overall Investment Test rating is "Outstanding." The excellent level of qualified CD investments and grants, good responsiveness to credit and CD needs, and significant use of innovative and/or complex investments support this conclusion. Conclusions regarding overall performance are consistent in the Tulare, Kern, and Fresno AAs. The bank's performance is inconsistent and below

the overall conclusion in the San Luis Obispo, Ventura, Kings, and Santa Barbara AAs. Refer to each AA for specific details and analysis.

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. The bank made or continues to hold 465 qualified CD investments and grants totaling $106.7 million. During the evaluation period, BOTS total qualified CD investments and grants represented 2.9 percent of average total assets and 9.4 percent of average total securities. This ratio is similar to the previous evaluation's ratios of 2.5 percent of average total assets and 10.8 percent of average total securities. At the previous evaluation, the bank made or continued to hold 214 qualified investments and grants totaling $85.3 million. BOTS investment performance was higher than three similarly situated institutions that maintained excellent levels of qualified CD investments and grants. Overall, the bank's level of qualified investments and grants was excellent compared to these three institutions.

Of the total new qualified investments, BOTS made $3.5 million in 2022, $7.1 million in 2023, $21.3 million in 2024, and $7.5 million in the first three quarters of 2025. BOTS maintained 55 prior period investments across the AAs with a current book value of $41.7 million. Of these prior period investments, 50 investments totaling $36.2 million supported community services through school bonds benefiting schools in LMI areas. The following table details the qualified investment and grant activity by AA and CD purpose.

Qualified Investments by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Tulare AA	3	12,124	16	10,478	1	238	2	137	**22**	**22,977**
Kern AA	0	0	12	7,856	0	0	0	0	**12**	**7,856**
Fresno AA	1	1,007	16	12,938	0	0	0	0	**17**	**13,945**
San Luis Obispo AA	0	0	1	512	0	0	0	0	**1**	**512**
Ventura AA	1	1,515	5	4,232	0	0	0	0	**6**	**5,747**
Kings AA	1	507	2	552			1	93	**4**	**1,152**
Santa Barbara AA	0	0	1	1,039	0	0	0	0	**1**	**1,039**
Statewide Activities	15	30,318	0	0	6	21,120	0	0	**21**	**51,438**
Investment Subtotal	**21**	**45,471**	**53**	**37,607**	**7**	**21,358**	**3**	**230**	**84**	**104,666**
Qualified Grants	58	384	279	1,074	36	385	8	150	**381**	**1,993**
Total	**79**	**45,855**	**332**	**38,681**	**43**	**21,743**	**11**	**380**	**465**	**106,659**
Source: Bank Data										

As illustrated in the table above, BOTS also invested in 21 statewide investments totaling $51.4 million. These statewide investments consisted of 14 prior period investments with an outstanding book value of $23.5 million and 7 new investments totaling $27.9 million. Of the 21 statewide investments, 15 investments totaling $45.6 million benefited multiple AAs and 6 investments totaling $5.8 million benefited the broader statewide area. Of the 21 statewide investments, 9 were mortgage-backed securities, 5 low-income housing tax credits (LIHTCs), 3 SBIC funds, 2 SBA CD entity loan consortium funds, 1 SBA loan pool, and 1 CA affordable housing consortium. Refer to the respective AAs for additional details for the impact of these statewide investments.

The following are notable examples of statewide and multi-AA qualified investments.

- In 2024 and 2025, the bank made new allocations in a fixed-income asset backed investment collateralized by 18 SBA 504 small business loans totaling $7.2 million. The investments help to provide job creation and/or retention for LMI jobs. The investment impacted multiple AAs, including Tulare, Kern, Fresno, San Luis Obispo, Ventura, and Kings.

- In 2023, BOTS invested $5.0 million in a LIHTC fund to finance 2 projects creating 356 affordable housing for LMI individuals in the Tulare and San Luis Obispo AAs.

- In 2024, the bank invested in a $5.0 million LIHTC fund to support the construction of 113 affordable housing units in the Tulare and Kern AAs.

Refer to the individual AAs for additional details and notable examples of qualified investment activities.

Responsiveness to Credit and Community Development Needs

The institution exhibits good responsiveness to credit and CD needs. This is supported mainly by the bank's investments in affordable housing initiatives, community services, and economic development activities, all of which are primary needs for the AAs served. From 2023 to 2025, BOTS also demonstrated responsiveness to the revitalization and stabilization needs of designated disaster areas after winter storms and flooding occurred throughout the AAs. BOTS efforts included over $150,000 in relief fund donations.

Community Development Initiatives

The institution makes significant use of innovative and/or complex investments to support CD initiatives. Innovative and complex investments made during the evaluation period include LIHTCs, which require more bank resources and expertise to purchase than less complex instruments, such as mortgage-backed securities. A LIHTC investment provides tax incentives to encourage individual and corporate investors to invest in the acquisition, development, and rehabilitation of affordable rental housing. To qualify for the credit, a project must meet strict requirements to qualify as a low-income project. During the review period, the bank made 5 new LIHTC investments totaling $20.6 million.

The bank invested $11.8 million in the Solomon Hess SBA Loan Fund which provides CD loans in the bank's AAs. The investment is a certified CD loan fund that creates greater financial liquidity and a lower cost of capital within the SBA 7(a) loan secondary market. The loan fund has a primary mission of promoting permanent job creation, retention, and/or improvement for LMI individuals who are employed by small businesses.

Refer to the AA level analysis for more details.

SERVICE TEST

The Service Test rating is "Outstanding." An excellent level of CD service performance primarily supports this rating. Conclusions regarding overall performance are consistent with the Tulare, Fresno, Ventura, San Luis Obispo, and Santa Barbara AAs. The bank's performance is inconsistent and below the overall conclusion in the Kern and Kings AAs.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the bank's AAs. BOTS operates 34 full-service branches, plus its corporate office and 39 ATMs located throughout its AAs. The bank operates 25 branches with drive-up services and 5 branches with walk-up services at various branches within its AA. Of the bank's 39 ATMs, 32 are located at branch offices and 7 are at off-site locations. Of the seven off-site ATMs, five are full-service and two are cash dispensing only. The institution operates a total of three loan production offices: two in middle-income CTs in the city of Templeton, CA (located in San Luis Obispo County) and one in an upper-income CT in the city of Roseville, CA (located in Sacramento County).

BOTS has 14 branches and 18 ATMs in LMI geographies, representing 41.2 percent of its branches and 46.2 percent of its ATM networks within these CTs. This percentage compares favorably to the 32.2 percent of branches operated by all institutions located within LMI CTs in the bank's AAs. However, BOTS branch distribution is not consistent among the AAs. Refer to each AA for more details.

Branch and ATM Distribution by Geography Income Level								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	63	6.5	269,795	6.6	3	8.8	4	10.3
Moderate	256	26.6	1,090,864	26.5	11	32.4	14	35.9
Middle	320	33.2	1,419,520	34.5	13	38.2	13	33.3
Upper	297	30.8	1,265,116	30.7	7	20.6	8	20.5
NA	28	2.9	72,693	1.8	0	0.0	0	0.0
Total	**964**	**100.0**	**4,117,988**	**100.0**	**34**	**100.0**	**39**	**100.0**
Source: 2020 US Census Data; Bank Data *Due to rounding, totals may not equal 100.0%*								

The institution offers a variety of alternative delivery systems for customers to access banking products and services including online banking, mobile banking, and telephone banking. Online and mobile banking services provide customers with access to mobile wallets, mobile check deposits, fund transfers between accounts, balances, electronic statements, and online bill pay. Additionally, the institution offers a digital Money Manager tool, allowing customers to create personal budgets, monitor expenses, track bills and income, and view progress with a cash flow calendar.

The bank is a member of the Allpoint ATM network, providing customers with surcharge-free access to over 43,000 ATMs nationwide and another 12,000 in foreign countries. Telephone banking is also available 24 hours a day, includes a hearing-impaired option, and is accessible in English and Spanish languages. A customer service center is accessible by toll-free telephone from 7:30 a.m. to 6:00 p.m. Monday through Friday.

With the exception of the two loan production offices in San Luis Obispo County, the institution offers the same alternative delivery systems throughout its AAs; therefore, only ATM alternative delivery system differences will be analyzed and discussed at the AA level.

Changes in Branch Locations

To the extent changes have been made, the institution's closing of a branch has not adversely affected the accessibility of its delivery systems, particularly to LMI individuals and in LMI geographies. During the evaluation period, BOTS closed one middle-income tract branch in the Tulare AA.

Net Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Income Level of Census Tract (+/-)			
			Low	Moderate	Middle	Upper
Tulare	0	1	0	0	-1	0

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the AAs, particularly LMI geographies and/or individuals. All branches are full-service and offer the same products and services throughout the bank's AAs. Business hours are generally similar and vary slightly according to local area needs. Of the 34 branch offices, 18 are open from 9:00 a.m. to 5:00 p.m., 11 are open from 9:00 a.m. to 4:00 p.m., and 5 are open from 10:00 a.m. to 4:00 p.m. Monday through Thursday. On Friday, all but two branch offices have extended hours until 6:00 p.m. Branches are not open on Saturday or Sunday for all AAs. Twenty-four of the 25 branches with drive-up service have operating hours from 8:30 a.m. to 5:30 p.m. Monday through Thursday and extended hours until 6:00 p.m. on Friday. For the other branch with drive-up service, hours are from 9:00 a.m. to 4:00 p.m. Monday through Friday. For the five branches with walk-up service, hours are generally from 8:30 a.m. to 5:30 p.m. Monday through Thursday with extended hours until 6:00 p.m. on Friday.

Community Development Services

The institution is a leader in providing CD services. During the 36-month evaluation period, 356 employees contributed a total of 8,160 hours to 124 different organizations. This level of CD services represents a significant increase from the previous evaluation where 258 employees contributed a total of 3,546 hours to 69 different organizations within a 21-month evaluation period. Employee participation during this evaluation period increased with a majority of full-time employees contributing to the service hours. On an annualized basis, BOTS' total CD service hours increased 30.4 percent when compared to the prior evaluation. BOTS' annualized CD service hours performance exceeded two similarly situated large institutions, one that provided a high level of CD services and one that is a leader in providing CD services.

A substantial majority of the CD services supported the community services purpose, where employees participated in numerous instances to facilitate financial education to LMI individuals. These activities are responsive to the identified need for financial education in the AAs. Additionally, BOTS processed applications for grants from the Federal Home Loan Bank's Affordable Housing Program and the Access to Housing and Economic Assistance for Development Program. These grants are responsive in helping to meet the small business support and affordable housing needs of the AAs. The following table details CD service hours by year and purpose during the evaluation period.

Community Development Services by Assessment Area					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
Tulare AA	19	1,974	91	0	**2,084**
Kern AA	0	770	40	0	**810**
Fresno AA	0	1,141	29	0	**1,170**
San Luis Obispo AA	4	914	143	0	**1,061**
Ventura AA	16	1,041	0	0	**1,057**
Kings AA	0	159	0	0	**159**
Santa Barbara AA	0	242	0	0	**242**
Statewide Activities	182	72	1,244	79	**1,577**
Total	**221**	**6,313**	**1,547**	**79**	**8,160**
Source: Bank Data					

As reflected in the table above, BOTS also contributed 1,577 statewide hours to 10 organizations that benefited multiple AAs and the CA statewide area. Of the statewide hours, approximately 1,323 hours were provided to 5 organizations and benefitted 2 or more of the bank's AAs. The remaining 254 CD service hours were contributed to the remaining 5 organizations and benefited northern CA. The following are notable examples of CD services that benefited multiple AAs and the statewide area:

- From December 2023 through the third quarter of 2025, one bank employee contributed 79

hours as a Board member for the American Red Cross non-profit organization. The hours supported the organization's planning and disaster relief responses to federally declared disasters in the bank's AAs and throughout the state of CA.

- One bank Board member and executive officer served as Board members of a regional organization that fosters economic development to create and retain jobs in the San Luis Obispo and Santa Barbara AAs. Throughout the evaluation period, the two individuals contributed a total of 995 hours to the organization.

- A bank executive provided 235 hours serving as Board Chair and Treasurer for a CDFI that focuses on lending and technical assistance services to small businesses within a 15-county service area in CA's Central Valley, including four of the bank's AAs.

Refer to the full-scope assessment area for further details and notable examples of CD services provided.

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.

TULARE ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULARE ASSESSMENT AREA

The Tulare AA includes all CTs in Tulare County, which is wholly contained within the Visalia, CA MSA #47300. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

Tulare AA	**2015 ACS CTs**		**2020 U.S. Census CTs**	
	#	%	#	%
Low	2	2.6	2	1.9
Moderate	26	33.3	34	33.0
Middle	26	33.3	35	34.0
Upper	23	29.5	31	30.1
N/A	1	1.3	1	1.0
Total	**78**	**100.0**	**103**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, and business information within the Tulare AA.

Demographic Information of the Assessment Area Tulare AA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	103	1.9	33.0	34.0	30.1	1.0
Population by Geography	473,117	1.7	32.0	33.8	32.4	0.0
Housing Units by Geography	150,079	1.8	30.7	33.8	33.7	0.0
Owner-Occupied Units by Geography	79,353	0.8	25.1	33.6	40.5	0.0
Occupied Rental Units by Geography	59,691	3.2	40.0	32.3	24.6	0.0
Vacant Units by Geography	11,035	1.4	21.0	43.3	34.3	0.0
Businesses by Geography	23,527	3.0	25.7	32.7	38.6	0.0
Farms by Geography	1,888	1.2	24.0	38.7	36.1	0.0
Family Distribution by Income Level	108,328	22.9	17.2	17.3	42.7	0.0
Household Distribution by Income Level	139,044	24.1	15.9	17.4	42.6	0.0
Median Family Income MSA - 47300 Visalia, CA MSA		$55,395	Median Housing Value			$ 222,389
			Median Gross Rent			$977
			Families Below Poverty Level			18.4%

Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

The three largest industries in the AA are non-classifiable establishments at 13.2 percent, other services (excluding public administration) at 9.7 percent, and retail trade at 9.3 percent of businesses. Further, most businesses in the area are smaller as 74.4 percent of area businesses have 4 or fewer employees and 90.4 percent of businesses operate from a single location.

The FFIEC publishes annual estimates of updated median family incomes by MSA or MD. The following table shows FFIEC-estimated median family incomes in the Tulare AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Visalia, CA MSA Median Family Income (47300)				
2025 ($72,000)	<$36,000	$36,000 To <$57,600	$57,600 To <$86,400	>=$86,400
2024 ($72,000)	<$36,000	$36,000 To <$57,600	$57,600 To <$86,400	>=$86,400
2023 ($67,700)	<$33,850	$33,850 To <$54,160	$54,160 To <$81,240	>=$81,240
2022 ($66,900)	<$33,450	$33,450 To <$53,520	$53,520 To <$80,280	>=$80,280
Source: FFIEC				

Examiners obtained the following economic information from Moody's as of July 2025.

Visalia CA

The Visalia economy has slowed. The area's manufacturing, construction, and hospitality losses have negated gains in healthcare and local government. The unemployment rate has increased, driven in part by modest growth in the labor force and economic headwinds. With dairy as the primary agricultural sector, the area ranks among the most agriculturally dependent in the U.S. The metropolitan area's manufacturing sector has an outsized share of employment in dairy and agricultural processing, which is highly vulnerable to consumer demand shifts. Increased tariffs on foreign feed, fertilizer, and equipment have increased volatility and raised production expenses. Labor costs have also increased as the dairy industry is heavily reliant on immigrant labor. While the area's natural population increases remain robust compared to the national average, the region has experienced consistent negative net domestic migration over the past decade. The area's scarcity of well-paying jobs creates a challenge to attract and retain residents. Increased single-family permits and construction activity is moderating home prices through supply constraint reductions.

The area's strengths include a high birth rate, population with a low median age, and high-capacity transit networks near major business hubs. Area weaknesses include below average educational attainment, low per capita income, elevated poverty levels, sustained negative population migration, high volatility due to low industrial diversification, and vulnerability to trade and tariff policy changes. The top three employers are Kaweah Delta Healthcare, Sierra View District Hospital, and Walmart Inc.

Competition

The Tulare AA has a low level of competition for financial services. According to the June 30, 2025 FDIC Deposit Market Share Report, the AA contains 13 financial institutions operating 47 branches with a total of $7.3 billion in deposits. A significant proportion of large national and

regional financial institutions operate in the AA. The three largest financial institutions include BOTS; Bank of America, National Association (NA); and Wells Fargo Bank, NA. Collectively, these financial institutions comprise 56.0 percent of total deposit market share within the AA. BOTS maintains $1.6 billion in deposits, representing 21.6 percent of the AA deposit market share, and ranks 1st among competing financial institutions.

Community Contacts

Examiners conducted a community contact interview with a local Small Business Development Center that provides counseling services to small businesses throughout the Tulare AA. The contact stated that the area has an agriculture-based economy that faces challenges with natural disasters and a history of economic struggles. The contact indicated that the area has a predominant Hispanic population and a higher poverty rate than the metropolitan areas. The contact noted a lack of financial education, training, and financing for small businesses in the area. The contact stated that there are opportunities to provide CDFIs or Small Business Development Centers with grants, equity equivalent investments, or competitive interest rates loans. Additionally, there are needs for banker outreach and financial education to underbanked rural communities as well as grants or funding to colleges.

Credit and Community Development Needs and Opportunities

Considering information available from available demographic and economic data, the community contact, and bank management, examiners determined there is a credit need for small business and home mortgage financing. The CD needs of the area include financial education, support for educational attainment, affordable housing, and business financing to attract or retain jobs. Opportunities exist for financial institutions to provide equity equivalent investments, grants, or low-interest rate loans to CDFIs and Small Business Development Centers. Further, there are financial education opportunities for LMI, rural areas, and colleges.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE TULARE ASSESSMENT AREA

LENDING TEST

Lending Test performance in the Tulare AA demonstrates excellent performance. Excellent geographic distribution, adequate borrower profile, and excellent level of CD lending primarily support this conclusion.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs. During the evaluation period, BOTS originated 257 small business loans totaling $45.1 million and 71 small farm loans totaling $9.3 million in the Tulare AA. At the prior evaluation, the bank originated 955 small business loans totaling $105.1 million and 54 small farm loans totaling $10.7 million in the AA.

There is a moderate level of competition for small business lending data in the AA. In 2024, 90 lenders reported 7,942 small business loans totaling $226.8 million. Of these institutions, BOTS ranked 12th with 0.9 percent market share by number of loans and 6.8 percent market share by dollar volume. The top 3 institutions accounted for 42.8 percent of the market by number of reported small business loans.

There is a low level of competition for small farm lending in the AA. In 2024, 20 lenders reported 423 small farm loans totaling $19.8 million. Of these institutions, BOTS ranked 6th with 6.4 percent market share by number of loans and a 16.9 percent market share by dollar volume. The top 3 institutions maintained 56.0 percent of the market share by number of loans.

Geographic Distribution

BOTS geographic distribution of loans reflects excellent penetration throughout the Tulare AA.

Small Business Loans

The geographic distribution of small business loans reflects excellent penetration. The following table shows the distribution of BOTS small business loans by CT income level.

Geographic Distribution of Small Business Loans Tulare AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	2.8	1.8	7	7.0	1,471	9.8
2023	2.8	1.9	8	9.5	1,019	6.9
2024	3.0	2.1	3	4.1	270	1.8
Moderate						
2022	25.4	24.7	31	31.0	3,573	23.9
2023	25.1	25.0	17	20.2	2,663	18.1
2024	25.7	24.2	26	35.6	5,338	34.7
Middle						
2022	32.5	32.0	40	40.0	5,715	38.2
2023	32.6	31.0	33	39.3	5,896	40.0
2024	32.7	30.2	21	28.8	6,100	39.6
Upper						
2022	39.3	41.5	22	22.0	4,211	28.1
2023	39.5	42.2	26	31.0	5,174	35.1
2024	38.6	43.6	23	31.5	3,688	24.0
NA						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**100**	**100.0**	**14,970**	**100.0**
2023	**100.0**	**100.0**	**84**	**100.0**	**14,752**	**100.0**
2024	**100.0**	**100.0**	**73**	**100.0**	**15,396**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

During the evaluation period, BOTS distribution of small business loans in low-income CTs substantially exceeded both reported aggregate data and D&B percentage of businesses. The bank's performance is notable as aggregate and demographic data reflect limited lending opportunities within low-income CTs of the AA. Further, BOTS small business lending in moderate-income CTs significantly exceeded aggregate performance in 2022 and 2024, while performance was slightly below aggregate in 2023. Overall, the bank's small business lending reflects excellent penetration in LMI CTs throughout the evaluation period.

Small Farm Loans

The geographic distribution of small farm loans reflects excellent penetration. The following table shows the distribution of BOTS small business loans by CT income level.

Geographic Distribution of Small Farm Loans Tulare AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	1.2	1.0	1	4.6	15	0.4
2023	1.1	1.5	2	9.1	170	6.7
2024	1.2	0.7	0	0.0	0	0.0
Moderate						
2022	22.8	21.5	5	22.7	500	14.4
2023	23.8	20.4	2	9.1	265	10.4
2024	24.0	22.1	7	25.9	1,074	32.2
Middle						
2022	38.8	45.1	9	40.9	1,560	45.1
2023	38.4	45.6	12	54.6	1,310	51.6
2024	38.7	37.2	12	44.4	867	26.0
Upper						
2022	37.3	32.3	7	31.8	1,388	40.1
2023	36.7	32.5	6	27.3	795	31.3
2024	36.1	39.9	8	29.6	1,395	41.8
NA						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**22**	**100.0**	**3,463**	**100.0**
2023	**100.0**	**100.0**	**22**	**100.0**	**2,540**	**100.0**
2024	**100.0**	**100.0**	**27**	**100.0**	**3,336**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

In 2022 and 2023, BOTS distribution of small farm loans in low-income CTs significantly exceeded both reported aggregate data and the D&B percentage of farms. While the bank did not originate any 2024 small farm loans in low income CTs, the aggregate data reflects limited demand and opportunities. In 2022 and 2024, BOTS lending performance in moderate-income CTs was similar to aggregate performance and the percentage of businesses. The bank's 2023 performance was

below aggregate and percentage of businesses. Overall, BOTS small farm performance over the evaluation period reflects excellent penetration considering its low-income penetration.

Borrower Profile

BOTS distribution of borrowers reflects adequate penetration among business customers of different revenue sizes.

Small Business Loans

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among business customers of different revenue sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category
Tulare AA

Gross Revenue Level	% of Businesses	CRA Aggregate % of #	#	%	$(000s)	%
<= $1,000,000						
2022	86.1	55.0	52	52.0	4,388	29.3
2023	87.3	58.3	43	51.2	4,023	27.3
2024	87.6	57.8	30	41.1	2,387	15.5
> $1,000,000						
2022	3.8	--	48	48.0	10,582	70.7
2023	3.4	--	41	48.8	10,729	72.7
2024	2.9	--	41	56.2	12,896	83.8
Revenue Not Available						
2022	10.1	--	0	0.0	0	0.0
2023	9.3	--	0	0.0	0	0.0
2024	9.5	--	2	2.7	113	0.7
Total						
2022	**100.0**	**100.0**	**100**	**100.0**	**14,970**	**100.0**
2023	**100.0**	**100.0**	**84**	**100.0**	**14,752**	**100.0**
2024	**100.0**	**100.0**	**73**	**100.0**	**15,396**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

The bank's lending performance to small businesses with gross annual revenues (GARs) of $1.0 million or less trended downward during the evaluation period. The bank's lending performance to small businesses was below the percentage of businesses and below aggregate performance for all three years. In 2024 the institution's performance was substantially below aggregate data. Overall,

the institution's small business lending performance reflects adequate penetration throughout the evaluation period.

Small Farm Loans

The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among business customers of different revenue sizes.

Distribution of Small Farm Loans by Gross Annual Revenue Category
Tulare AA

Gross Revenue Level	% of Farms	CRA Aggregate % of #	#	%	$(000s)	%
<= $1,000,000						
2022	89.2	47.0	13	59.1	1,740	50.3
2023	90.4	46.6	11	50.0	785	30.9
2024	91.2	47.2	16	59.3	1,468	44.0
> $1,000,000						
2022	8.8	--	9	40.9	1,723	49.8
2023	7.8	--	11	50.0	1,755	69.1
2024	7.0	--	11	40.7	1,868	56.0
Revenue Not Available						
2022	2.0	--	0	0.0	0	0.0
2023	1.8	--	0	0.0	0	0.0
2024	1.8	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**22**	**100.0**	**3,463**	**100.0**
2023	**100.0**	**100.0**	**22**	**100.0**	**2,540**	**100.0**
2024	**100.0**	**100.0**	**27**	**100.0**	**3,336**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

The bank's lending performance to small farms with GARs of $1.0 million or less was below the D&B percentage of farms data for all 3 years. Examiners determined conclusions based on comparisons to aggregate data. BOTS' small farm performance exceeded aggregate in all three years, including substantially exceeding aggregate in 2022 and 2024. Overall, the institution's small farm lending performance reflects excellent penetration throughout the evaluation period.

Community Development Loans

The institution is a leader in making CD loans in the AA. During the evaluation period, BOTS originated 26 CD loans for approximately $67.6 million in the AA. At the previous evaluation, the bank made 6 CD loans totaling $13.7 million in the Tulare AA. When compared to the previous evaluation, CD lending performance increased 145.9 percent by number and 180.6 percent by dollar volume on an annualized basis. BOTS performance exceeded one similarly situated institution that was a leader in making CD loans and one similarly situated institution that made a relatively high level of CD loans. The majority of BOTS CD lending supported economic development. The following table illustrates the bank's CD lending activity by year and CD category.

Community Development Lending – Tulare AA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
08/16/2022 – 12/31/2022	0	0	0	0	0	0	2	8,100	**2**	**8,100**
2023	2	1,825	2	10,100	2	5,500	0	0	**6**	**17,425**
2024	0	0	2	350	7	4,088	0	0	**9**	**4,438**
01/01/2025 – 9/30/2025	0	0	2	10,100	7	27,517	0	0	**9**	**37,617**
Total	**2**	**1,825**	**6**	**20,550**	**16**	**37,105**	**2**	**8,100**	**26**	**67,580**
Source: Bank Data										

The following are notable examples of CD loans originated in the AA during the evaluation period.

- In 2023, the bank originated a $685,000 loan for the purchase of an 18-unit low-income multifamily apartment complex in Tulare County. The loan is covered under the Home Investment Partnerships Program, which is a regulatory agreement with strict long-term affordability requirements and established rent maximums that create affordable housing. The property contains 11 units that must be rented to very low-income families and the remaining 7 units must be rented to low-income families.

- In 2023, the bank originated a $3.0 million revolving line of credit to a manufacturing business in Tulare County. The line of credit purpose is to purchase inventory and lumber for the mill to continue production. The loan supports economic development as the mill employs over 100 LMI employees.

- In 2023 and 2025, the bank made and renewed a revolving line of credit of $10.0 million (for a total of $20.0 million during the evaluation period) to support working capital for a non-profit, licensed Federally Qualified Health Center. The organization provides medical, dental, and mental health services to low-income individuals and families that receive Medicaid and Medi-Cal. The line of credit enables the organization to maintain operations, manage cash flows, and continue expanding health care services across its service area.

INVESTMENT TEST

The Investment Test performance in the Tulare AA reflects excellent performance. The excellent level of qualified investments and grants, good responsiveness, and significant use of innovative and/or complex investments support this conclusion.

Investment and Grant Activity

BOTS 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 in the Tulare AA. During the evaluation period, the bank received credit for 18 prior period investments totaling $14.0 million, 4 new investments totaling $9.0 million, and 80 grants totaling $573,000. All of these activities solely benefited the Tulare AA. The new investments included two LIHTCs, a municipal bond, and an investment to support electric vehicle charging stations. By number and dollar volume, the majority of the investments are prior period.

In addition to direct investment activities in the AA, BOTS made 4 additional statewide investments totaling $18.3 million that benefited multiple AAs including the Tulare AA, of which $6.9 million directly benefited the AA. The new statewide investments included two LIHTCs, a mortgage backed security supporting affordable housing, and one SBIC loan fund that supports economic development. There were also 6 prior period investments with an outstanding book value totaling $8.7 million, of which $2.8 million directly benefited the Tulare AA. Although these investments are not included in the Qualified Investment table below, they are included under the statewide section of the bank-wide AA table.

BOTS' overall dollar volume of qualified investment and grant activity benefiting the AA totaled $33.2 million. BOTS' performance exceeded one similarly situated institution with excellent performance and two similarly situated institutions with good performance. At the previous evaluation, the bank made or continued to hold 36 qualified investments and grants totaling $15.8 million that benefitted the Tulare AA. The bank's investment activities primarily support community services targeted to LMI individuals and affordable housing. The following table details the qualified investment and grant activity that directly benefited the AA by year and CD purpose.

Qualified Investments Assessment Area: Tulare AA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	1	4,124	15	9,552	1	238	1	77	**18**	**13,991**
08/16/2022 – 12/31/2022	0	0	1	926	0	0	0	0	**1**	**926**
2023	0	0	0	0	0	0	1	60	**1**	**60**
2024	2	8,000	0	0	0	0	0	0	**2**	**8,000**
01/01/2025 – 9/30/2025	0	0	0	0	0	0	0	0	**0**	**0**
Subtotal	**3**	**12,124**	**16**	**10,478**	**1**	**238**	**2**	**137**	**22**	**22,977**
Qualified Grants & Donations	11	151	56	249	10	149	3	25	**80**	**573**
Total	**14**	**12,275**	**72**	**10,727**	**11**	**387**	**5**	**162**	**102**	**23,550**
Source: Bank Data										

The following are notable examples of qualifying investments and grants made in the Tulare AA during the evaluation period.

- BOTS maintained 1 prior period LIHTC with an outstanding balance of approximately $4.1 million that supports long-term affordable housing for LMI individuals in the AA. Affordable housing is a significant AA need.

- In 2024, the bank made a new $3.0 million investment in a LIHTC fund that supports the financing of an apartment complex with 57 affordable housing units in Tulare, CA.

- During the evaluation period, BOTS donated $36,750 to healthcare clinics and foundations that support critical healthcare access to area residents.

- In 2023, BOTS made a $5,000 grant to a non-profit assisting a local school district serving LMI students that lost access to drinking water due to drought conditions.

Responsiveness to Credit and Community Development Needs

BOTS exhibits good responsiveness to credit and CD needs. The majority of the institution's investments support affordable housing, which is an identified AA need. The activities also supported community services targeted to LMI individuals, economic development, and revitalization or stabilization.

Community Development Initiatives

The institution makes significant use of innovative and/or complex investments to support CD initiatives. During the evaluation period, BOTS invested in two new LIHTCs and continued to hold one prior period LIHTC. BOTS also made two new LIHTC investments that benefited multiple

AAs, including Tulare. The use of LIHTCs demonstrates the institution's use of more complex investments to support long-term, affordable housing needs in the AA. Additionally, one new investment in the Tulare AA focused on electric vehicle infrastructure charging stations.

SERVICE TEST

The Service Test performance in the Tulare AA reflects excellent performance. An excellent level of CD services primarily supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the Tulare AA. BOTS operates 11 branch offices, a corporate headquarters, and 18 ATMs in this AA. The branch distribution for the AA exceeds the institution's overall distribution and is therefore inconsistent. The following table shows the distribution of CTs, population, branches, and ATMs in the AA by tract income level.

Branch and ATM Distribution by Geography Income Level
Assessment Area: Tulare AA

Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	2	1.9	8,222	1.7	2	18.2	3	16.7
Moderate	34	33.0	151,893	32.0	3	27.3	5	27.8
Middle	35	34.0	160,114	33.8	4	36.4	6	33.3
Upper	31	30.1	153,164	32.4	2	18.2	4	22.2
NA	1	1.0	24	0.0	0	0	0	0.0
Total	**103**	**100.0**	**473,117**	**100.0**	**11**	**100.0**	**18**	**100.0**

Source: 2020 U.S. Census Data; Bank Data
Due to rounding, totals may not equal 100.0%

Branches in LMI geographies represent 45.5 percent of its total branch network in the Tulare AA. This percentage compares favorably to the 44.7 percent of branches operated by all institutions within LMI tracts in the AA.

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 to LMI individuals. The bank did not open any branches in the AA during the review period. BOTS closed its Tulare Branch on October 31, 2025, which was located in a middle-income CT. The closure did not have impact to LMI areas.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the Tulare AA, particularly LMI geographies and individuals. Monday through Thursday, seven

branches are open from 9:00 a.m. to 4:00 p.m., one branch is open from 9:00 a.m. to 5:00 p.m., and three are open from 10:00 a.m. to 4:00 p.m. On Friday, one branch is open from 9:00 a.m. to 4:00 p.m., seven are open from 9:00 a.m. to 6:00 p.m., and three are open from 10:00 a.m. to 6:00 p.m. Nine branch offices offer drive-up services from 8:30 a.m. to 5:30 p.m. Monday through Thursday and 8:30 a.m. to 6:00 p.m. on Friday, with the exception of one office with hours from 9:00 a.m. to 4:00 p.m. Monday through Friday. Additionally, three branches offer walk-up services: two with hours from 8:30 a.m. to 5:30 p.m. Monday through Thursday and 8:30 a.m. to 6:00 p.m. on Friday and one with hours from 8:30 a.m. to 10:00 a.m. and 4:00 p.m. to 5:30 p.m. Monday through Thursday and 8:30 a.m. to 10:00 a.m. on Friday.

Community Development Services

The institution is a leader in providing CD services in the Tulare AA. During the evaluation period, 256 employees contributed a total of 2,084 hours to 35 different organizations. At the previous evaluation, 166 employees contributed a total of 1,378 hours to 32 different organizations that benefited the Tulare AA. On an annualized basis, the service hours represent a decrease of 14.2 percent compared to the previous evaluation. However, the bank's annualized CD service hours were significantly above the performance of two similarly situated institutions that were rated as leaders in providing CD services. The following table shows the number of service hours by year and CD purpose.

Community Development Services – Tulare AA					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
08/16/2022 – 12/31/2022	0	144	18	0	**162**
2023	0	347	33	0	**380**
2024	12	495	28	0	**535**
01/01/2025 – 09/30/2025	7	988	12	0	**1,007**
Total	**19**	**1,974**	**91**	**0**	**2,084**
Source: Bank Data					

The following are notable examples of CD service activities provided during the evaluation period.

- The bank partnered with a local community action agency to administer a scholarship program for LMI high school students in their pursuit of higher education. During the evaluation period, 198 employees contributed 734 service hours to help students apply for the scholarships, review scholarship applications, and select recipients.

- A bank executive serves as a board member of a nonprofit economic development corporation to provide guidance on program development and implementation to attract, support, and retain businesses within Tulare County.

- In 2022, several bank employees provided financial education using FDIC Money Smart to LMI students at a high school where 62.5 percent of students are eligible to participate in the federal free and reduced-price meal program.

- From 2023 to 2025, a bank Board member contributed 110 service hours through participation on multiple advisory boards for College of the Sequoias District, which serves 62.0 percent of LMI students.

KERN ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KERN ASSESSMENT AREA

The Kern AA includes all CTs in Kern County, which is part of the Bakersfield-Delano, CA MSA #12540. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

Kern AA	**2015 ACS CTs**		**2020 U.S. Census CTs**	
	#	%	#	%
Low	14	9.3	19	8.1
Moderate	40	26.5	65	27.5
Middle	44	29.1	70	29.7
Upper	48	31.8	74	31.4
N/A	5	3.3	8	3.4
Total	**151**	**100.0**	**236**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, and business information within the Kern AA.

Demographic Information of the Assessment Area Kern AA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	236	8.1	27.5	29.7	31.4	3.4
Population by Geography	909,235	8.0	28.0	29.8	31.4	2.8
Housing Units by Geography	299,179	8.1	27.8	30.6	32.4	1.2
Owner-Occupied Units by Geography	161,113	3.8	21.8	30.3	43.5	0.7
Occupied Rental Units by Geography	112,443	14.0	34.5	31.2	18.6	1.8
Vacant Units by Geography	25,623	9.1	36.1	30.4	23.1	1.3
Businesses by Geography	59,153	5.5	20.0	27.7	41.1	5.7
Farms by Geography	1,416	2.4	33.2	27.4	34.7	2.3
Family Distribution by Income Level	201,939	23.5	17.1	17.5	42.0	0.0
Household Distribution by Income Level	273,556	24.9	15.9	16.4	42.8	0.0
Median Family Income MSA - 12540 Bakersfield-Delano, CA MSA		$61,044	Median Housing Value			$ 209,189
			Median Gross Rent			$1,034
			Families Below Poverty Level			16.7%

Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

The top three largest industries in the AA are non-classifiable establishments at 18.9 percent, other services (excluding public administration) at 9.4 percent, and transportation and warehousing at 9.1 percent of businesses. Additionally, 70.7 percent of area businesses have 4 or fewer employees and 92.4 percent of businesses operate from a single location.

The following table shows FFIEC-estimated median family incomes in the Kern AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Bakersfield, CA MSA Median Family Income (12540)				
2023 ($72,600)	<$36,300	$36,300 To <$58,080	$58,080 To <$87,120	>=$87,120
2022 ($67,900)	<$33,950	$33,950 To <$54,320	$54,320 To <$81,480	>=$81,480
Bakersfield-Delano, CA MSA Median Family Income (12540)				
2025 ($78,600)	<$39,300	$39,300 To <$62,880	$62,880 To <$94,320	>=$94,320
2024 ($78,600)	<$39,300	$39,300 To <$62,880	$62,880 To <$94,320	>=$94,320
Source: FFIEC				

Examiners obtained the following economic information from Moody's as of July 2025.

Bakersfield-Delano CA

The area's economy is slowing after expanding in 2024. The area's employment rate declined in 2025, driven by job losses in manufacturing, logistics, and government. Government layoffs reduced payroll numbers, and the federal hiring freeze is preventing vacant positions are not being filled. The area's economy has a higher concentration of oil and gas reliance than any other city in the state. Weaker energy demand and oversupply have resulted in lower energy prices. Conversely, employment has expanded in the mining and healthcare sectors. Healthcare accounts for an above average share of jobs and remains a critical support industry for the area. Home sales have fallen year-over-year, driven by a persistent decline in affordability. As housing inventory increases, house prices are falling, and builders have reduced construction.

The area's strengths include a young population demographic, significant oil deposits, extensive farmland, and an advantageous geography for warehousing and distribution. Area weaknesses include below average educational attainment, high poverty levels, slow pace of new business creation, and high volatility due to low industrial diversification. The top three employers in the area are Edwards Air Force Base, Dignity Health, and Naval Air Warfare Center.

Competition

The Kern AA has a moderate level of competition for financial services. According to the June 30, 2025 FDIC Deposit Market Share Report, the AA contains 16 financial institutions operating 72 branches with a total of $11.4 billion in deposits. A substantial number of large national and regional financial institutions operate in the AA. The three largest financial institutions include Wells Fargo Bank, NA; JP Chase Bank, NA; and Bank of America, NA. Collectively, these financial institutions comprise 56.0 percent of total deposit market share within the AA. BOTS

maintains $433.3 million in deposits, representing 3.8 percent of the AA deposit market share, and ranks 8th among competing financial institutions.

Community Contacts

Examiners conducted two community contact interviews with organizations that serve the Kern AA. The first contact is a CDFI that provides flexible loans and technical assistance to small businesses. The contact noted that the Kern County economy is comprised primarily of oil and oil supporting industries. The contact indicated that the area also has significant rural areas, high poverty, and large Hispanic and African American minority populations. The contact stated that there are various financial needs and opportunities, including small business financing, business workshops, financial education, affordable housing, organization loan committee participation, and capital deployment to local CDFIs for small business lending.

The second contact is a non-profit that serves as a collaborator for economic development to create jobs in the area's communities. The contact stated that Kern County lacks sufficient infrastructure, financial education, and small business financing. The contact advised that there are significant opportunities available for financial institutions to engage in credit or CD efforts, such as small business financing, flexible loan underwriting criteria, offering more financial education training, and deposit products that encourage consumers to save money.

Credit and Community Development Needs and Opportunities

Considering available information from demographic and economic data, community contacts, and bank management, examiners determined that there are credit need for small business and home mortgage financing. The CD needs of the area include affordable housing, CDFI funding, financial education, and technical assistance to small businesses. Opportunities exist for financial institutions to participate in small business financing, flexible lending products, workshops, and organization loan committees. Additional opportunities are available for financial institutions to assist CDFIs in their efforts to finance and support small businesses.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE KERN ASSESSMENT AREA

LENDING TEST

Lending Test performance in the Kern AA demonstrates good performance. Good geographic distribution, poor borrower profile, and a leader in making CD loans primarily support this conclusion.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs. During the evaluation period, BOTS originated 132 small business loans totaling $25.9 million and 8 small farm loans totaling $1.4 million in the Kern AA. At the prior evaluation, the bank originated 257 small business loans totaling $27.5 million and 6 small farm loans totaling $1.7 million in the AA.

There is a high level of competition for small business lending data in the AA. In 2024, 101 lenders reported 18,354 small business loans totaling $519.3 million. Of these institutions, BOTS ranked 39th with 0.2 percent market share by number of loans and 2.1 percent market share by dollar volume. The top 3 institutions accounted for 46.0 percent of the market by number of reported small business loans.

There is a low level of competition for small farm lending in the AA. In 2024, 18 lenders reported 238 small farm loans totaling $9.2 million. Of these institutions, BOTS ranked 12th with 0.8 percent market share by number of loans and a 3.3 percent market share by dollar volume. The top 3 institutions maintained 61.3 percent of the market share by number of reported small farm loans.

Geographic Distribution

BOTS geographic distribution of loans reflects good penetration throughout the Kern AA.

Small Business Loans

The geographic distribution of small business loans reflects good penetration. The following table shows the distribution of BOTS small business loans by CT income level.

Geographic Distribution of Small Business Loans Kern AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	5.3	4.1	2	3.9	70	0.9
2023	5.4	4.2	2	5.0	160	2.3
2024	5.5	4.0	2	5.0	650	6.0
Moderate						
2022	19.8	17.8	6	11.5	1,125	14.3
2023	20.2	18.3	5	12.5	1,739	24.4
2024	20.0	17.9	9	22.5	3,985	36.6
Middle						
2022	27.6	29.0	15	28.9	1,950	24.8
2023	27.7	28.4	11	27.5	1,018	14.3
2024	27.7	27.6	7	17.5	2,385	21.9
Upper						
2022	41.5	45.0	29	55.8	4,721	60.0
2023	41.1	45.5	20	50.0	3,950	55.5
2024	41.1	46.4	20	50.0	3,305	30.4
NA						
2022	5.8	4.1	0	0.0	0	0.0
2023	5.6	3.6	2	5.0	250	3.5
2024	5.7	4.2	2	5.0	560	5.1
Total						
2022	**100.0**	**100.0**	**52**	**100.0**	**7,866**	**100.0**
2023	**100.0**	**100.0**	**40**	**100.0**	**7,117**	**100.0**
2024	**100.0**	**100.0**	**40**	**100.0**	**10,885**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

BOTS distribution of small business loans in low-income CTs was slightly below D&B percentage of businesses but similar to reported aggregate data in 2022; but slightly higher in 2023 and 2024. In 2022 and 2023, BOTS small business lending performance in moderate-income CTs was below D&B and aggregate data. In 2024, BOTS small business lending exceeded both D&B and reported aggregate data. Given the limited opportunities in low-income CTs the bank's performance is considered good in low-income CTs. In addition, the bank's performance showed an upward trend year after year in LMI CTs. Considering these factors, the bank's small business lending reflects good penetration in LMI CTs.

Small Farm Loans

The geographic distribution of small farm loans reflects poor penetration. The following table shows the distribution of BOTS small business loans by CT income level.

Geographic Distribution of Small Farm Loans Kern AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	2.7	1.9	0	0.0	0	0.0
2023	2.7	1.4	0	0.0	0	0.0
2024	2.4	0.9	0	0.0	0	0.0
Moderate						
2022	33.0	33.3	1	33.3	500	58.8
2023	33.3	34.7	1	33.3	100	47.6
2024	33.2	32.2	0	0.0	0	0.0
Middle						
2022	25.4	22.6	0	0.0	0	0.0
2023	26.5	23.6	0	0.0	0	0.0
2024	27.4	27.0	0	0.0	0	0.0
Upper						
2022	37.1	40.4	2	66.7	350	41.2
2023	35.9	37.5	2	66.7	110	52.4
2024	34.7	39.1	2	100.0	303	100.0
NA						
2022	1.8	1.9	0	0.0	0	0.0
2023	1.6	2.8	0	0.0	0	0.0
2024	2.3	0.9	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**3**	**100.0**	**850**	**100.0**
2023	**100.0**	**100.0**	**3**	**100.0**	**210**	**100.0**
2024	**100.0**	**100.0**	**2**	**100.0**	**303**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Given the bank's Kern AA branch presence, deposit levels, and small farm product offerings, the bank's total small farm lending levels are low and affected conclusions. The bank did not make small farm loans in low-income CTs; however, D&B data and reported aggregate reflect limited demand and opportunities. In 2022 and 2023, the bank originated 2 small farm loans in moderate-

income CTs. No small farm loans were made in moderate-income CTs in 2024. Overall, the bank's small farm lending represents poor penetration in this AA throughout the evaluation period.

Borrower Profile

BOTS distribution of borrowers reflects poor penetration among business customers of different revenue sizes.

Small Business Loans

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among business customers of different revenue sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category
Kern AA

Gross Revenue Level	% of Businesses	CRA Aggregate % of #	#	%	$(000s)	%
<= $1,000,000						
2022	89.1	48.0	29	55.8	1,544	19.6
2023	90.2	51.2	19	47.5	800	11.2
2024	90.6	50.7	14	35.0	3,480	32.0
> $1,000,000						
2022	3.0	--	23	44.2	6,322	80.4
2023	2.7	--	21	52.5	6,317	88.8
2024	2.3	--	26	65.0	7,405	68.0
Revenue Not Available						
2022	7.9	--	0	0.0	0	0.0
2023	7.1	--	0	0.0	0	0.0
2024	7.2	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**52**	**100.0**	**7,866**	**100.0**
2023	**100.0**	**100.0**	**40**	**100.0**	**7,117**	**100.0**
2024	**100.0**	**100.0**	**40**	**100.0**	**10,885**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

The bank's lending performance to small businesses with GARs of $1.0 million or less trended downward during the evaluation period. The bank's lending performance to small businesses was below the percentage of businesses for all three years. Examiners focused on the bank's performance compared to reported aggregate data for conclusions. BOTS lending performance to small businesses with GARs of $1.0 million or less exceeded aggregate in 2022; however,

performance was below aggregate in 2023 and substantially below aggregate in 2024. Overall, the institution's small business lending performance reflects poor penetration throughout the evaluation period.

Small Farm Loans

The distribution of borrowers reflects, given the product lines offered by the institution, very poor penetration among business customers of different revenue sizes.

Distribution of Small Farm Loans by Gross Annual Revenue Category Kern AA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	87.8	43.3	1	33.3	100	11.8
2023	89.3	44.4	0	0.0	0	0.0
2024	90.0	43.5	0	0.0	0	0.0
> $1,000,000						
2022	8.8	--	2	66.7	750	88.2
2023	7.6	--	3	100.0	210	100.0
2024	6.9	--	2	100.0	303	100.0
Revenue Not Available						
2022	3.5	--	0	0.0	0	0.0
2023	3.2	--	0	0.0	0	0.0
2024	3.2	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**3**	**100.0**	**850**	**100.0**
2023	**100.0**	**100.0**	**3**	**100.0**	**210**	**100.0**
2024	**100.0**	**100.0**	**2**	**100.0**	**303**	**100.0**
Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.						

Similar to the Tulare AA, based on the bank's AA performance context, branch presence, deposits holdings, and small farm product offerings, the bank's total small farm lending volume is low and affected conclusions. The bank's lending performance to small farms with GARs of $1.0 million or less was below the D&B percentage of farms data and aggregate data for all three years. Overall, the institution's small farm lending performance reflects very poor penetration throughout the evaluation period.

Community Development Loans

The institution is a leader in making CD loans in the AA. During the evaluation period, BOTS originated 22 CD loans totaling approximately $53.1 million in the AA. At the previous evaluation, the bank made 9 CD loans totaling $12.0 million in the Kern AA. When compared to the previous evaluation, CD lending performance increased 38.7 percent by number and 150.5 percent by dollar volume on an annualized basis. BOTS performance exceeded two similarly situated institutions that are leaders in making CD loans within the AA. The majority of BOTS CD lending supported economic development. The following table illustrates the bank's CD lending activity by year and CD category.

Community Development Lending – Kern AA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
08/16/2022 – 12/31/2022	0	0	0	0	0	0	0	0	**0**	**0**
2023	2	2,107	0	0	1	1,500	0	0	**3**	**3,607**
2024	0	0	1	10,000	8	12,414	0	0	**9**	**22,414**
01/01/2025 – 9/30/2025	0	0	3	13,675	7	13,421	0	0	**10**	**27,096**
Total	**2**	**2,107**	**4**	**23,675**	**16**	**27,335**	**0**	**0**	**22**	**53,117**
Source: Bank Data										

The following are notable examples of CD loans originated in the AA during the evaluation period.

- In 2024 and 2025, the bank made and renewed a revolving line of credit of $10.0 million (for a total evaluation period of $20.0 million) to support the continuing operations of a non-profit Federally Qualified Health Center. The non-profit provides comprehensive healthcare to primarily LMI individuals and families living in economically depressed sectors throughout the southern Central Valley. The majority of patients the organization served during the evaluation period were recipients of Medi-Cal.

- In 2023, the bank made a $1.4 million dollar loan to a borrower for the purchase of an apartment complex with 13 two-bedroom affordable housing units in Bakersfield, CA. This loan is responsive to the need of affordable housing in the AA.

INVESTMENT TEST

The Investment Test performance in the Kern AA is excellent. The excellent level of qualified investments and grants, good responsiveness, and occasional use of innovative and/or complex investments support this conclusion.

Investment and Grant Activity

The institution has an excellent level of qualified investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the Kern AA. During the evaluation period, BOTS continued to hold 12 prior period investments with a current book value of approximately $7.9 million and granted 57 donations totaling $240,000. All of these activities solely benefited the Kern AA.

In addition to direct investment activities in the AA, BOTS made 3 new statewide investments totaling $13.3 million that benefited multiple AAs, of which $5.5 million directly benefited the Kern AA. The new statewide investments included one LIHTC, a mortgage-backed security supporting affordable housing, and one SBIC loan fund that supports economic development. There were also 5 prior period investments totaling $12.2 million, of which $5.1 million directly benefited the AA. These investment numbers are not included in the following Qualified Investments table.

BOTS's overall dollar volume of qualified investment and grant activity benefiting the AA totaled $18.7 million. BOTS' performance slightly exceeded both a similarly situated institution that had an excellent performance and one similarly situated institution with an adequate performance. At the previous evaluation, the bank made or continued to hold 34 qualified investments and grants totaling $20.1 million that benefited the Kern AA. The bank's investment activity primarily supports community services for LMI individuals. The following table details the qualified investment and grant activity that directly benefited the Kern AA by year and CD purpose.

Qualified Investments Assessment Area: Kern AA										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	0	0	12	7,856	0	0	0	0	**12**	**7,856**
08/16/2022 – 12/31/2022	0	0	0	0	0	0	0	0	**0**	**0**
2023	0	0	0	0	0	0	0	0	**0**	**0**
2024	0	0	0	0	0	0	0	0	**0**	**0**
01/01/2025 – 9/30/2025	0	0	0	0	0	0	0	0	**0**	**0**
Subtotal	**0**	**0**	**12**	**7,856**	**0**	**0**	**0**	**0**	**12**	**7,856**
Qualified Grants & Donations	4	18	48	179	5	43	0	0	**57**	**240**
Total	**4**	**18**	**60**	**8,035**	**5**	**43**	**0**	**0**	**69**	**8,096**
Source: Bank Data										

The following are notable examples of qualified investments made in the Kern AA during the evaluation period.

- BOTS has $7.9 million in outstanding prior period investments in bonds to support schools

in which the majority of students are from LMI families.

- In 2024 and 2025, BOTS donated $25,000 to support healthcare clinics and foundations that support critical healthcare access to residents.

Responsiveness to Credit and Community Development Needs

BOTS exhibits good responsiveness to credit and community economic development needs in the Kern AA. This is reflected in the notable school bond investments that support community services for LMI individuals which is responsive to the CD need of the AA. Other activities supported economic development and affordable housing.

Community Development Initiatives

BOTS occasionally uses innovative and/or complex investments to support CD initiatives. The bank's investments in the Kern AA consisted of school bonds which are not innovative or complex but are not routinely provided by private investors.

SERVICE TEST

The Service Test performance in the Kern AA reflects good performance. The institution provides a relatively high level of CD services within the AA.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Kern AA. BOTS operates seven branch offices and six ATMs in this AA. Branch and ATM distribution in low-income geographies is below the institution overall. The following table shows the distribution of CTs, population, branches, and ATMs in this AA by tract income level.

Branch and ATM Distribution by Geography Income Level
Assessment Area: Kern AA

Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	19	8.1	72,700	8.0	0	0.0	0	0.0
Moderate	65	27.5	254,438	28.0	2	28.6	2	33.3
Middle	70	29.7	271,121	29.8	3	42.9	2	33.3
Upper	74	31.4	285,711	31.4	2	28.6	2	33.3
NA	8	3.4	25,265	2.8	0	0.0	0	0.0
Total	**236**	**100.0**	**909,235**	**100.0**	**7**	**100.0**	**6**	**100.0**

Source: 2020 U.S. Census Data; Bank Data
Due to rounding, totals may not equal 100.0%

The bank does not have a presence of branches or ATMs in low-income CTs within the Kern AA. The branches in moderate-income geographies represent 28.6 percent of the bank's total branch

network in the Kern AA. This percentage is slightly below the 30.7 percent of branches operated by all institutions within LMI tracts in the AA. The bank's presence of ATMs in moderate-income CTs at 33.3 percent is comparable to CTs and demographic data.

Changes in Branch Locations

The bank did not open close any branches in the Kern AA during the evaluation period; therefore, examiners did not evaluate this criterion.

Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences certain portions of the Kern AA, particularly LMI geographies and individuals. Monday through Thursday, five branches are open from 9:00 a.m. to 5:00 p.m. and two branches are open from 10:00 a.m. to 4:00 p.m. On Friday, five branches are open from 9:00 a.m. to 6:00 p.m. and two branches are open from 10:00 a.m. to 6:00 p.m. All seven branches offer drive-up services from 8:30 a.m. to 5:30 p.m. Monday through Thursday and 8:30 a.m. to 6:00 p.m. on Friday.

Community Development Services

The institution provides a relatively high level of CD services in the Kern AA. During the evaluation period, 79 employees contributed a total of 810 hours to 27 different organizations. At the previous evaluation, employees contributed a total of 542 service hours that benefited the Kern AA. On an annualized basis, the service hours represent a decrease of 15.2 percent compared to the previous evaluation. The bank's annualized CD service hours were below the performance of one similarly-situated institution that was rated a leader in providing CD services. The following table shows the number of service hours by year and CD purpose.

Community Development Services – Kern County					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
08/13/2022 – 12/31/2022	0	126	0	0	**126**
2023	0	114	0	0	**114**
2024	0	346	32	0	**378**
01/1/2025 – 09/30/2025	0	184	8	0	**192**
Total	**0**	**770**	**40**	**0**	**810**
Source: Bank Data					

The following are notable examples of CD service activities provided in the Kern AA during the evaluation period.

- In 2024, a bank executive contributed 27 service hours serving on the board of a chamber of commerce that serves the AA. The organization specializes in providing technical

assistance programs to minority-owned small businesses. Small business technical assistance is an identified need and opportunity noted by the community contact.

- In 2022, 10 bank employees provided 105 hours of financial education to a nonprofit that serves LMI adults with development mental disabilities through workforce development and support services.

- In 2023 and 2025, several bank employees provided financial education to a local senior center, serving predominantly LMI seniors. Participants were provided with presentation materials including fraud and scam prevention as well as FDIC Money Smart financial education.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE REVIEW ASSESSMENT AREAS

The following table summarizes the conclusions for the AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including aggregate data comparisons, economic data, competition, and demographic information. The conclusions from the limited-scope reviews did alter the bank's overall Lending Test performance rating for the rated area.

Assessment Area	Lending Test	Investment Test	Service Test
Fresno	Consistent	Consistent	Consistent
San Luis Obispo	Consistent	Below	Consistent
Ventura	Below	Below	Consistent
Kings	Below	Below	Below
Santa Barbara	Below	Below	Consistent

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of the BOTS' operations and activities. Demographic data and deposit market share information for the limited-scope assessment area are included in the Appendices of this PE.

Fresno AA

The Fresno AA consists of the entire Fresno County. The bank operates six full-service branches and six ATMs in this AA. Branch locations did not change during the evaluation period. The bank's branch and ATM distribution in moderate-income CTs is consistent with the institution overall; however, no branches are located in low-income CT which is inconsistent with the institution overall performance.

Activity	#	$(000s)
Small Business Loans	118	20,211
Small Farm Loans	22	2,381
CD Loans	16	34,409
Investments (New)	1	250
Investments (Prior Period)	16	13,695
Donations	55	224
CD Services	1,170	-
Source: Bank Data		

San Luis Obispo AA

The San Luis Obispo AA consists of the entire San Luis Obispo County. The bank operates three full-service branches and three ATMs in this AA. Branch locations did not change during the evaluation period. There are no low-income CTs in the San Luis Obispo AA. The bank's branch and ATM distribution significantly exceeds moderate-income CTs and demographics and is consistent with the institution overall.

Activity	#	$(000s)
Small Business Loans	89	21,078
Small Farm Loans	41	12,517
CD Loans	25	46,732
Investments (New)	0	0
Investments (Prior Period)	1	512
Donations	46	174
CD Services	1,061	-
Source: Bank Data		

Ventura AA

The Ventura AA consists of the entire Ventura County. The bank operates four full-service branches and four ATMs in this AA. Branch locations did not change during the evaluation period The bank's branch and ATM distribution significantly exceeds LMI CTs and demographics for the AA and is consistent with the institution overall.

Activity	#	$(000s)
Small Business Loans	60	10,039
Small Farm Loans	1	300
CD Loans	14	14,347
Investments (New)	2	1,765
Investments (Prior Period)	4	3,982
Donations	80	286
CD Services	1,057	-
Source: Bank Data		

Kings AA

The Kings AA consists of the entire Kings County. The bank operates one full-service branch and one ATM in this AA. Branch locations did not change during the evaluation period. There are no low-income CTs in the Kings AA. The bank's branch and ATM distribution significantly exceeds moderate-income CTs and demographics and is consistent with the institution overall.

Activity	**#**	**$(000s)**
Small Business Loans	52	11,114
Small Farm Loans	7	1,155
CD Loans	6	4,843
Investments (New)	1	507
Investments (Prior Period)	3	645
Donations	16	50
CD Services	159	-
Source: Bank Data		

Santa Barbara

The Santa Barbara AA consists of the entire Santa Barbara County. The bank operates two full-service branches and one ATM in this AA. Branch locations did not change during the evaluation period. The bank's branch and ATM distribution in LMI CTs with no presence and is inconsistent with the institution overall.

Activity	**#**	**$(000s)**
Small Business Loans	17	2,341
Small Farm Loans	5	1,575
CD Loans	2	899
Investments (New)	0	0
Investments (Prior Period)	1	1,039
Donations	20	63
CD Services	242	-
Source: Bank Data		

Geographic Distribution and Borrower Profile

Geographic Distribution of Small Business Loans Fresno AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	8.5	6.5	3	6.4	1,957	20.4
2023	8.6	6.3	2	5.3	285	5.2
2024	8.6	5.8	1	3.0	100	1.9
Moderate						
2022	22.0	21.0	12	25.5	1,928	20.0
2023	22.4	20.7	7	18.4	1,414	26.0
2024	23.0	21.0	10	30.3	1,537	29.9
Middle						
2022	27.6	26.0	12	25.5	2,215	23.0
2023	27.6	25.6	14	36.8	1,620	29.8
2024	27.4	25.0	9	27.3	1,717	33.4
Upper						
2022	41.1	45.7	20	42.6	3,519	36.6
2023	40.8	46.7	15	39.5	2,124	39.0
2024	40.5	47.7	13	39.4	1,795	34.9
NA						
2022	0.7	0.8	0	0.0	0	0.0
2023	0.6	0.7	0	0.0	0	0.0
2024	0.5	0.5	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**47**	**100.0**	**9,619**	**100.0**
2023	**100.0**	**100.0**	**38**	**100.0**	**5,443**	**100.0**
2024	**100.0**	**100.0**	**33**	**100.0**	**5,149**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Business Loans by Gross Annual Revenue Category Fresno AA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	89.5	48.1	23	48.9	920	9.6
2023	91.0	50.1	19	50.0	540	9.9
2024	91.1	50.6	18	54.6	927	18.0
> $1,000,000						
2022	3.2	--	24	51.1	8,699	90.4
2023	2.7	--	19	50.0	4,903	90.1
2024	2.4	--	15	45.5	4,222	82.0
Revenue Not Available						
2022	7.3	--	0	0.0	0	0.0
2023	6.3	--	0	0.0	0	0.0
2024	6.5	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**47**	**100.0**	**9,619**	**100.0**
2023	**100.0**	**100.0**	**38**	**100.0**	**5,443**	**100.0**
2024	**100.0**	**100.0**	**33**	**100.0**	**5,149**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Farm Loans Fresno AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	4.6	4.3	0	0.0	0	0.0
2023	5.0	3.6	0	0.0	0	0.0
2024	4.1	3.8	0	0.0	0	0.0
Moderate						
2022	21.9	22.2	2	28.6	205	61.0
2023	21.1	17.6	0	0.0	0	0.0
2024	21.0	19.3	1	10.0	130	7.7
Middle						
2022	38.4	42.0	4	57.1	121	36.0
2023	37.7	44.3	3	60.0	305	83.6
2024	38.3	43.4	6	60.0	800	47.6
Upper						
2022	35.1	31.6	1	14.3	10	3.0
2023	36.2	34.6	2	40.0	60	16.4
2024	36.6	33.5	3	30.0	750	44.6
NA						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**7**	**100.0**	**336**	**100.0**
2023	**100.0**	**100.0**	**5**	**100.0**	**365**	**100.0**
2024	**100.0**	**100.0**	**10**	**100.0**	**1,680**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Farm Loans by Gross Annual Revenue Category Fresno AA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	92.0	52.7	7	100.0	336	100.0
2023	92.8	56.5	5	100.0	365	100.0
2024	93.5	45.4	8	80.0	980	58.3
> $1,000,000						
2022	5.9	--	0	0.0	0	0.0
2023	5.2	--	0	0.0	0	0.0
2024	4.5	--	2	20.0	700	41.7
Revenue Not Available						
2022	2.2	--	0	0.0	0	0.0
2023	2.1	--	0	0.0	0	0.0
2024	2.0	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**7**	**100.0**	**336**	**100.0**
2023	**100.0**	**100.0**	**5**	**100.0**	**365**	**100.0**
2024	**100.0**	**100.0**	**10**	**100.0**	**1,680**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Business Loans San Luis Obispo AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Moderate						
2022	12.1	13.3	5	14.7	1,350	20.0
2023	12.1	12.9	5	14.3	715	7.4
2024	11.7	12.5	2	10.0	25	0.5
Middle						
2022	62.7	62.6	21	61.8	2,158	32.0
2023	63.2	60.7	18	51.4	3,713	38.6
2024	63.6	61.3	15	75.0	2,916	61.8
Upper						
2022	23.4	22.6	8	23.5	3,241	48.0
2023	22.9	25.0	12	34.3	5,180	53.9
2024	22.9	25.1	3	15.0	1,780	37.7
NA						
2022	1.8	1.4	0	0.0	0	0.0
2023	1.8	1.4	0	0.0	0	0.0
2024	1.8	1.1	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**34**	**100.0**	**6,749**	**100.0**
2023	**100.0**	**100.0**	**35**	**100.0**	**9,608**	**100.0**
2024	**100.0**	**100.0**	**20**	**100.0**	**4,721**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Business Loans by Gross Annual Revenue Category San Luis Obispo AA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	90.4	53.7	19	55.9	3,135	46.5
2023	91.1	56.0	13	37.1	2,428	25.3
2024	91.4	56.4	10	50.0	1,065	22.6
> $1,000,000						
2022	3.1	--	15	44.1	3,614	53.6
2023	2.8	--	22	62.9	7,180	74.7
2024	2.2	--	10	50.0	3,656	77.4
Revenue Not Available						
2022	6.6	--	0	0.0	0	0.0
2023	6.0	--	0	0.0	0	0.0
2024	6.5	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**34**	**100.0**	**6,749**	**100.0**
2023	**100.0**	**100.0**	**35**	**100.0**	**9,608**	**100.0**
2024	**100.0**	**100.0**	**20**	**100.0**	**4,721**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Farm Loans San Luis Obispo AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Moderate						
2022	13.2	15.1	1	25.0	500	29.9
2023	12.5	12.7	5	23.8	1,769	27.3
2024	12.3	13.7	2	12.5	750	17.2
Middle						
2022	54.8	49.3	1	25.0	500	29.9
2023	55.6	45.5	4	19.1	1,200	18.5
2024	53.7	52.0	8	50.0	2,347	53.8
Upper						
2022	29.7	33.8	2	50.0	671	40.2
2023	29.6	39.9	12	57.1	3,515	54.2
2024	31.7	33.7	5	31.3	1,050	24.1
NA						
2022	2.3	1.8	0	0.0	0	0.0
2023	2.3	1.9	0	0.0	0	0.0
2024	2.3	0.6	1	6.3	215	4.9
Total						
2022	**100.0**	**100.0**	**4**	**100.0**	**1,671**	**100.0**
2023	**100.0**	**100.0**	**21**	**100.0**	**6,484**	**100.0**
2024	**100.0**	**100.0**	**16**	**100.0**	**4,362**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Farm Loans by Gross Annual Revenue Category San Luis Obispo AA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	96.3	53.9	1	25.0	500	29.9
2023	96.3	54.5	9	42.9	2,850	44.0
2024	96.7	58.3	7	43.8	1,397	32.0
> $1,000,000						
2022	2.3	--	3	75.0	1,171	70.1
2023	2.3	--	12	57.1	3,634	56.1
2024	1.5	--	9	56.3	2,965	68.0
Revenue Not Available						
2022	1.4	--	0	0.0	0	0.0
2023	1.5	--	0	0.0	0	0.0
2024	1.8	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**4**	**100.0**	**1,671**	**100.0**
2023	**100.0**	**100.0**	**21**	**100.0**	**6,484**	**100.0**
2024	**100.0**	**100.0**	**16**	**100.0**	**4,362**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Business Loans Ventura AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	2.9	3.2	2	7.1	20	0.6
2023	3.0	2.9	1	6.7	292	9.7
2024	2.8	2.9	1	5.9	5	0.1
Moderate						
2022	16.8	15.9	4	14.3	475	14.1
2023	17.2	16.5	5	33.3	544	18.0
2024	17.2	15.7	5	29.4	229	6.3
Middle						
2022	43.8	44.7	13	46.4	1,203	35.7
2023	43.9	44.1	8	53.3	1,415	46.9
2024	44.0	43.9	9	52.9	2,435	66.7
Upper						
2022	36.2	36.0	9	32.1	1,673	49.6
2023	35.5	36.1	1	6.7	765	25.4
2024	35.8	37.3	2	11.8	983	26.9
NA						
2022	0.3	0.3	0	0.0	0	0.0
2023	0.3	0.3	0	0.0	0	0.0
2024	0.3	0.2	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**28**	**100.0**	**3,371**	**100.0**
2023	**100.0**	**100.0**	**15**	**100.0**	**3,016**	**100.0**
2024	**100.0**	**100.0**	**17**	**100.0**	**3,652**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Business Loans by Gross Annual Revenue Category Ventura AA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	90.0	51.6	11	39.3	973	28.9
2023	90.7	53.2	5	33.3	341	11.3
2024	90.7	54.7	7	41.2	1,132	31.0
> $1,000,000						
2022	3.5	--	17	60.7	2,398	71.1
2023	3.2	--	10	66.7	2,675	88.7
2024	2.7	--	10	58.8	2,520	69.0
Revenue Not Available						
2022	6.6	--	0	0.0	0	0.0
2023	6.1	--	0	0.0	0	0.0
2024	6.6	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**28**	**100.0**	**3,371**	**100.0**
2023	**100.0**	**100.0**	**15**	**100.0**	**3,016**	**100.0**
2024	**100.0**	**100.0**	**17**	**100.0**	**3,652**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Farm Loans Ventura AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	3.9	3.4	0	0.0	0	0.0
2023	4.0	4.3	0	0.0	0	0.0
2024	3.5	3.7	0	0.0	0	0.0
Moderate						
2022	22.3	29.5	0	0.0	0	0.0
2023	22.9	27.9	1	100.0	300	100.0
2024	22.8	21.8	0	0.0	0	0.0
Middle						
2022	37.7	32.9	0	0.0	0	0.0
2023	37.4	33.2	0	0.0	0	0.0
2024	37.3	37.5	0	0.0	0	0.0
Upper						
2022	36.1	33.3	0	0.0	0	0.0
2023	35.7	34.6	0	0.0	0	0.0
2024	36.2	37.0	0	0.0	0	0.0
NA						
2022	0.1	1.0	0	0.0	0	0.0
2023	0.1	--	0	0.0	0	0.0
2024	0.1	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2023	**100.0**	**100.0**	**1**	**100.0**	**300**	**100.0**
2024	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Farm Loans by Gross Annual Revenue Category Ventura AA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	90.5	52.2	0	0.0	0	0.0
2023	91.7	53.4	1	100.0	300	100.0
2024	93.0	59.7	0	0.0	0	0.0
> $1,000,000						
2022	6.1	--	0	0.0	0	0.0
2023	5.3	--	0	0.0	0	0.0
2024	4.2	--	0	0.0	0	0.0
Revenue Not Available						
2022	3.5	--	0	0.0	0	0.0
2023	3.0	--	0	0.0	0	0.0
2024	2.8	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2023	**100.0**	**100.0**	**1**	**100.0**	**300**	**100.0**
2024	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Business Loans Kings AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Moderate						
2022	26.7	25.6	6	28.6	695	20.5
2023	26.6	25.5	6	35.3	620	20.3
2024	25.2	25.0	9	64.3	3,235	69.3
Middle						
2022	36.2	38.2	3	14.3	1,450	42.9
2023	36.2	35.2	6	35.3	2,236	73.1
2024	37.1	34.8	2	14.3	1,125	24.1
Upper						
2022	36.9	36.2	12	57.1	1,238	36.6
2023	37.0	39.4	5	29.4	205	6.7
2024	37.6	40.2	3	21.4	310	6.6
NA						
2022	0.1	--	0	0.0	0	0.0
2023	0.1	--	0	0.0	0	0.0
2024	0.1	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**21**	**100.0**	**3,383**	**100.0**
2023	**100.0**	**100.0**	**17**	**100.0**	**3,061**	**100.0**
2024	**100.0**	**100.0**	**14**	**100.0**	**4,670**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Business Loans by Gross Annual Revenue Category Kings AA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	86.4	54.1	8	38.1	530	15.7
2023	87.5	56.3	3	17.7	55	1.8
2024	87.9	58.3	2	14.3	280	6.0
> $1,000,000						
2022	2.9	--	13	61.9	2,853	84.3
2023	2.6	--	14	82.4	3,006	98.2
2024	2.4	--	12	85.7	4,390	94.0
Revenue Not Available						
2022	10.7	--	0	0.0	0	0.0
2023	9.9	--	0	0.0	0	0.0
2024	9.7	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**21**	**100.0**	**3,383**	**100.0**
2023	**100.0**	**100.0**	**17**	**100.0**	**3,061**	**100.0**
2024	**100.0**	**100.0**	**14**	**100.0**	**4,670**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Farm Loans Kings AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	0.0	--	0	0.0	0	0.0
2023	0.0	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Moderate						
2022	9.2	3.9	0	0.0	0	0.0
2023	9.9	5.5	0	0.0	0	0.0
2024	7.5	9.9	0	0.0	0	0.0
Middle						
2022	37.4	39.2	1	100.0	230	100.0
2023	38.0	36.3	1	50.0	15	5.7
2024	37.9	31.4	1	25.0	15	2.3
Upper						
2022	53.2	56.9	0	0.0	0	0.0
2023	52.0	58.2	1	50.0	250	94.3
2024	54.6	58.7	3	75.0	645	97.7
NA						
2022	0.2	--	0	0.0	0	0.0
2023	0.2	--	0	0.0	0	0.0
2024	0.0	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**1**	**100.0**	**230**	**100.0**
2023	**100.0**	**100.0**	**2**	**100.0**	**265**	**100.0**
2024	**100.0**	**100.0**	**4**	**100.0**	**660**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Farm Loans by Gross Annual Revenue Category Kings AA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	90.1	51.0	1	100.0	230	100.0
2023	91.0	46.2	2	100.0	265	100.0
2024	91.3	46.3	2	50.0	265	40.2
> $1,000,000						
2022	8.2	--	0	0.0	0	0.0
2023	7.4	--	0	0.0	0	0.0
2024	6.9	--	2	50.0	395	59.9
Revenue Not Available						
2022	1.7	--	0	0.0	0	0.0
2023	1.6	--	0	0.0	0	0.0
2024	1.8	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**1**	**100.0**	**230**	**100.0**
2023	**100.0**	**100.0**	**2**	**100.0**	**265**	**100.0**
2024	**100.0**	**100.0**	**4**	**100.0**	**660**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Business Loans Santa Barbara AA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	3.0	2.3	1	12.5	25	1.3
2023	2.9	2.4	0	0.0	0	0.0
2024	2.9	2.4	0	0.0	0	0.0
Moderate						
2022	18.0	18.7	3	37.5	1,085	57.2
2023	18.4	19.0	1	25.0	10	15.4
2024	18.4	17.9	2	40.0	85	22.4
Middle						
2022	27.5	28.9	2	25.0	225	11.9
2023	28.0	28.5	1	25.0	25	38.5
2024	27.8	28.9	1	20.0	250	65.8
Upper						
2022	50.9	49.6	2	25.0	561	29.6
2023	50.0	49.7	2	50.0	30	46.2
2024	50.4	50.4	2	40.0	45	11.8
NA						
2022	0.7	0.5	0	0.0	0	0.0
2023	0.6	0.5	0	0.0	0	0.0
2024	0.5	0.4	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**8**	**100.0**	**1,896**	**100.0**
2023	**100.0**	**100.0**	**4**	**100.0**	**65**	**100.0**
2024	**100.0**	**100.0**	**5**	**100.0**	**380**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Business Loans by Gross Annual Revenue Category Santa Barbara AA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	89.4	50.2	5	62.5	621	32.8
2023	90.4	52.9	1	25.0	10	15.4
2024	90.4	52.9	1	20.0	10	2.6
> $1,000,000						
2022	3.5	--	3	37.5	1,275	67.3
2023	3.2	--	3	75.0	55	84.6
2024	2.8	--	4	80.0	370	97.4
Revenue Not Available						
2022	7.1	--	0	0.0	0	0.0
2023	6.4	--	0	0.0	0	0.0
2024	6.7	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**8**	**100.0**	**1,896**	**100.0**
2023	**100.0**	**100.0**	**4**	**100.0**	**65**	**100.0**
2024	**100.0**	**100.0**	**5**	**100.0**	**380**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Geographic Distribution of Small Farm Loans Santa Barbara AA						
Tract Income Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2022	1.7	5.8	0	0.0	0	0.0
2023	2.0	4.9	0	0.0	0	0.0
2024	1.7	3.4	0	0.0	0	0.0
Moderate						
2022	13.9	22.8	0	0.0	0	0.0
2023	15.0	22.4	0	0.0	0	0.0
2024	14.4	19.2	1	33.3	250	26.3
Middle						
2022	31.6	31.2	1	100.0	225	100.0
2023	32.2	32.2	0	0.0	0	0.0
2024	33.0	32.2	0	0.0	0	0.0
Upper						
2022	52.6	39.2	0	0.0	0	0.0
2023	50.7	40.6	1	100.0	400	100.0
2024	50.9	45.2	2	66.7	700	73.7
NA						
2022	0.3	1.1	0	0.0	0	0.0
2023	0.2	--	0	0.0	0	0.0
2024	0.1	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**1**	**100.0**	**225**	**100.0**
2023	**100.0**	**100.0**	**1**	**100.0**	**400**	**100.0**
2024	**100.0**	**100.0**	**3**	**100.0**	**950**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

Distribution of Small Farm Loans by Gross Annual Revenue Category Santa Barbara AA						
Gross Revenue Level	**% of Farms**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2022	92.1	45.0	1	100.0	225	100.0
2023	93.0	52.5	1	100.0	400	100.0
2024	93.6	47.5	3	100.0	950	100.0
> $1,000,000						
2022	5.4	--	0	0.0	0	0.0
2023	4.8	--	0	0.0	0	0.0
2024	4.0	--	0	0.0	0	0.0
Revenue Not Available						
2022	2.5	--	0	0.0	0	0.0
2023	2.3	--	0	0.0	0	0.0
2024	2.4	--	0	0.0	0	0.0
Total						
2022	**100.0**	**100.0**	**1**	**100.0**	**225**	**100.0**
2023	**100.0**	**100.0**	**1**	**100.0**	**400**	**100.0**
2024	**100.0**	**100.0**	**3**	**100.0**	**950**	**100.0**

Source: 2024, 2023, 2022 D&B Data; Bank Data; 2024, 2023, 2022 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%.

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

Bank of the Sierra	
Scope of Examination: Full scope reviews were performed on the following AAs within the noted rated area: **State of CA:** • Tulare AA • Kern AA	
Time Period Reviewed:	08/16/2022 to 12/08/2025
Products Reviewed: Small Business Loans: 01/01/2022 – 12/31/2024 Small Farm Loans: 01/01/2022 – 12/31/2024	

List of Assessment Areas and Type of Evaluation			
Rated Area/ Assessment Area	**Type of Evaluation**	**Branches Visited**	**Other Information**
State of CA:			
Tulare	Full-scope	None	None
Kern	Full-scope	None	None
Fresno	Limited-scope	None	None
San Luis Obispo	Limited-scope	None	None
Ventura	Limited-scope	None	None
Santa Barbara	Limited-scope	None	None
Kings	Limited-scope	None	None

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

State of CA

Fresno AA

The Fresno AA includes all CTs in Fresno County, which is wholly contained within the Fresno, CA MSA #23420. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

Fresno AA	**2015 ACS CTs**		**2020 U.S. Census CTs**	
	#	%	#	%
Low	18	9.0	26	11.6
Moderate	68	34.2	66	29.3
Middle	43	21.6	54	24.0
Upper	68	34.2	78	34.7
N/A	2	1.0	1	0.4
Total	**199**	**100.0**	**225**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, business, and farm information within the Fresno AA.

Demographic Information of the Assessment Area Fresno County						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	225	11.6	29.3	24.0	34.7	0.4
Population by Geography	1,008,654	11.6	28.7	25.3	34.3	0.2
Housing Units by Geography	333,357	10.6	27.5	25.5	36.3	0.2
Owner-Occupied Units by Geography	166,420	5.7	19.4	25.4	49.5	0.0
Occupied Rental Units by Geography	143,677	16.2	37.3	25.9	20.4	0.3
Vacant Units by Geography	23,260	11.3	24.2	24.1	39.8	0.6
Businesses by Geography	81,343	8.6	23.0	27.4	40.5	0.5
Farms by Geography	3,105	4.1	21.0	38.3	36.6	0.0
Family Distribution by Income Level	224,051	24.4	16.3	17.3	42.1	0.0
Household Distribution by Income Level	310,097	26.3	15.6	16.2	42.0	0.0
Median Family Income MSA - 23420 Fresno, CA MSA		$63,947	Median Housing Value			$ 256,341
			Median Gross Rent			$1,065
			Families Below Poverty Level			16.7%

Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

The top 3 largest industries in the AA are non-classifiable establishments at 19.2 percent, transportation and warehousing at 10.0 percent, and other services (excluding public administration) at 9.2 percent of businesses. Further, 70.7 percent of area businesses have 4 or fewer employees and 93.1 percent of businesses operate from a single location.

The following table shows FFIEC-estimated median family incomes in the Fresno AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Fresno, CA MSA Median Family Income (23420)				
2025 ($84,000)	<$42,000	$42,000 To <$67,200	$67,200 To <$100,800	>=$100,800
2024 ($84,000)	<$42,000	$42,000 To <$67,200	$67,200 To <$100,800	>=$100,800
2023 ($79,400)	<$39,700	$39,700 To <$63,520	$63,520 To <$95,280	>=$95,280
2022 ($72,900)	<$36,450	$36,450 To <$58,320	$58,320 To <$87,480	>=$87,480
Source: FFIEC				

Competition

The Fresno AA has a high level of competition for financial services. According to the June 30, 2025 FDIC Deposit Market Share data, the AA had 22 financial institutions operating 112 branch offices with $19.3 billion in total deposits. The top 3 financial institutions control 46.2 percent of the AA market share. BOTS ranks 14th among competing financial institutions with $305.9 million in total deposits representing 1.6 percent market share.

There is a high level of competition for small business lending in the AA. In 2024, 109 lenders reported 23,917 small business loans totaling $738.6 million. Of these institutions, BOTS ranked 44th with 0.1 percent market share by number of loans and 0.7 percent market share by dollar volume. The top 3 institutions accounted for 45.0 percent of the market by number of reported small business loans.

Small farm lending data shows low level of competition in the AA. In 2024, 24 lenders reported 507 small farm loans totaling $24.7 million. Of these institutions, BOTS ranked 9th with 2.2 percent market share by number of loans and 7.6 percent market share by dollar volume. The top 3 institutions maintained 60.8 percent of the market share by number of loans.

San Luis Obispo AA

This San Luis Obispo AA includes all CTs in San Luis Obispo County, which is wholly contained within the San Luis Obispo-Paso Robles, CA MSA #42020. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

San Luis Obispo AA	2015 ACS CTs		2020 U.S. Census CTs	
	#	%	#	%
Low	0	0.0	0	0.0
Moderate	7	13.0	8	11.4
Middle	34	63.0	43	61.4
Upper	8	14.8	12	17.1
N/A	5	9.3	7	10.0
Total	**54**	**100.0**	**70**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, business, and farm information within the San Luis Obispo AA.

Demographic Information of the Assessment Area San Luis Obispo County						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	70	0.0	11.4	61.4	17.1	10.0
Population by Geography	282,424	0.0	10.4	63.5	18.0	8.0
Housing Units by Geography	122,256	0.0	11.1	66.9	18.2	3.8
Owner-Occupied Units by Geography	66,635	0.0	10.5	66.7	21.4	1.4
Occupied Rental Units by Geography	39,609	0.0	12.3	65.9	13.6	8.3
Vacant Units by Geography	16,012	0.0	10.4	70.3	16.6	2.7
Businesses by Geography	28,189	0.0	11.7	63.6	22.9	1.8
Farms by Geography	853	0.0	12.3	53.7	31.7	2.3
Family Distribution by Income Level	67,187	20.4	17.5	22.5	39.6	0.0
Household Distribution by Income Level	106,244	24.4	16.1	17.7	41.8	0.0
Median Family Income MSA - 42020 San Luis Obispo-Paso Robles, CA MSA		$97,590	Median Housing Value			$ 617,576
			Median Gross Rent			$1,508
			Families Below Poverty Level			5.3%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The top 3 largest industries in the AA are non-classifiable establishments at 15.6 percent; professional, scientific, and technical services at 11.1 percent; and construction at 9.7 percent of businesses. Additionally, 73.5 percent of area businesses have 4 or fewer employees and 93.2 percent of businesses operate from a single location.

The following table shows FFIEC-estimated median family incomes in the San Luis Obispo AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
San Luis Obispo-Paso Robles, CA MSA Median Family Income (42020)				
2025 ($125,600)	<$62,800	$62,800 To <$100,480	$100,480 To <$150,720	>=$150,720
2024 ($125,600)	<$62,800	$62,800 To <$100,480	$100,480 To <$150,720	>=$150,720
2023 ($113,100)	<$56,550	$56,550 To <$90,480	$90,480 To <$135,720	>=$135,720
2022 ($109,200)	<$54,600	$54,600 To <$87,360	$87,360 To <$131,040	>=$131,040
Source: FFIEC				

Competition

The San Luis Obispo AA has a moderate level of competition for financial services. According to the June 30, 2025 FDIC Deposit Market Share data, the AA had 15 financial institutions operating 55 branch offices with $8.6 billion in total deposits. The top 3 financial institutions control 52.8 percent of the AA market share. BOTS ranks 10th among competing financial institutions with $182.4 million in total deposits representing 2.1 percent market share.

There is a moderate level of competition for small business lending in the AA. In 2024, 97 lenders reported 9,541 small business loans totaling $277.0 million. Of these institutions, BOTS ranked 35th with 0.2 percent market share by number of loans and 1.7 percent market share by dollar volume. The top 3 institutions accounted for 53.3 percent of the market by number of reported small business loans.

Small farm lending data reflects a low level of competition in the AA. In 2024, 20 lenders reported 179 small farm loans totaling $10.1 million. Of these institutions, BOTS ranked 4th with 8.9 percent market share by number of loans and 43.0 percent market share by dollar volume. The top 3 institutions maintained 62.0 percent of the market share by number of loans.

Ventura AA

The Ventura AA includes all CTs in Ventura County, which is wholly contained within the Oxnard-Thousand Oaks-Ventura, CA MSA #37100. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

Ventura AA	2015 ACS CTs		2020 U.S. Census CTs	
	#	%	#	%
Low	9	5.2	9	4.7
Moderate	50	28.7	46	24.2
Middle	61	35.1	77	40.5
Upper	51	29.3	55	29.0
N/A	3	1.7	3	1.6
Total	**174**	**100.0**	**190**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, business, and farm information within the Ventura AA.

Demographic Information of the Assessment Area Ventura County AA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	190	4.7	24.2	40.5	29.0	1.6
Population by Geography	843,843	4.9	23.9	42.5	28.5	0.3
Housing Units by Geography	289,425	3.4	21.7	44.1	30.3	0.5
Owner-Occupied Units by Geography	172,037	1.8	16.6	43.4	38.1	0.2
Occupied Rental Units by Geography	99,602	6.0	30.1	46.3	17.1	0.6
Vacant Units by Geography	17,786	3.8	24.8	38.9	29.2	3.2
Businesses by Geography	82,804	2.8	17.2	44.0	35.8	0.3
Farms by Geography	1,217	3.5	22.8	37.3	36.2	0.1
Family Distribution by Income Level	196,312	22.0	16.5	20.8	40.7	0.0
Household Distribution by Income Level	271,639	23.6	15.7	19.4	41.3	0.0
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		$101,160	Median Housing Value			$ 616,364
			Median Gross Rent			$1,883
			Families Below Poverty Level			6.1%

Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

The top 3 largest industries in the AA are non-classifiable establishments at 15.3 percent; professional, scientific, and technical services at 13.0 percent; and other services (excluding public administration) at 8.4 percent of businesses. Further, 74.1 percent of area businesses have 4 or fewer employees and 93.0 percent of businesses operate from a single location.

The following table shows FFIEC-estimated median family incomes in the Ventura AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Oxnard-Thousand Oaks-Ventura, CA MSA Median Family Income (37100)				
2025 ($125,600)	<$62,800	$62,800 To <$100,480	$100,480 To <$150,720	>=$150,720
2024 ($125,600)	<$62,800	$62,800 To <$100,480	$100,480 To <$150,720	>=$150,720
2023 ($123,500)	<$61,750	$61,750 To <$98,800	$98,800 To <$148,200	>=$148,200
2022 ($115,400)	<$57,700	$57,700 To <$92,320	$92,320 To <$138,480	>=$138,480
Source: FFIEC				

Competition

The Ventura AA has a high level of competition for financial services. According to the June 30, 2025 FDIC Deposit Market Share data, the AA had 20 financial institutions operating 119 branch offices with $23.4 billion in total deposits. The top 3 financial institutions control 68.3 percent of the AA market share. BOTS ranks 10th among competing financial institutions with $324.0 million in total deposits representing 1.4 percent market share.

There is a high level of competition for small business lending in the AA. In 2024, 128 lenders reported 30,003 small business loans totaling $737.7 million. Of these institutions, BOTS ranked 52nd with less than 0.1 percent market share by number of loans and 0.5 percent market share by dollar volume. The top 3 institutions accounted for 58.1 percent of the market by number of reported small business loans.

Small farm lending data indicates a low level of competition in the AA. In 2024, 13 lenders reported 246 small farm loans totaling $4.8 million. In 2024, BOTS did not make any small farm loans in the Ventura AA. The top 3 institutions maintained 76.7 percent of the market share by number of loans.

Kings AA

This AA includes all census tracts within Kings County, which is wholly contained within the Hanford-Corcoran, CA MSA # 25260. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

Kings AA	2015 ACS CTs		2020 U.S. Census CTs	
	#	%	#	%
Low	1	3.7	0	0.0
Moderate	7	25.9	9	29.0
Middle	8	29.6	11	35.5
Upper	9	33.3	9	29.0
N/A	2	7.4	2	6.5
Total	**27**	**100.0**	**31**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, business, and farm information within the Kings AA.

Demographic Information of the Assessment Area Kings County						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	31	0.0	29.0	35.5	29.0	6.5
Population by Geography	152,486	0.0	24.3	39.1	28.0	8.6
Housing Units by Geography	46,267	0.0	25.9	40.7	33.4	0.0
Owner-Occupied Units by Geography	23,368	0.0	19.6	38.9	41.6	0.0
Occupied Rental Units by Geography	20,236	0.0	32.3	42.8	24.9	0.0
Vacant Units by Geography	2,663	0.0	32.8	40.1	27.1	0.0
Businesses by Geography	6,309	0.0	25.2	37.1	37.6	0.1
Farms by Geography	654	0.0	7.5	37.9	54.6	0.0
Family Distribution by Income Level	34,155	22.0	17.5	20.3	40.2	0.0
Household Distribution by Income Level	43,604	22.7	17.5	19.2	40.6	0.0
Median Family Income MSA - 25260 Hanford-Corcoran, CA MSA		$64,353	Median Housing Value			$ 216,418
			Median Gross Rent			$1,055
			Families Below Poverty Level			13.1%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The top 3 largest industries in the AA are non-classifiable establishments at 15.6 percent; other services (excluding public administration) at 10.1 percent; and agriculture, forestry, fishing and

hunting at 9.4 percent of businesses. Further, 71.8 percent of area businesses have 4 or fewer employees and 90.4 percent of businesses operate from a single location.

The following table shows FFIEC-estimated median family incomes in the Kings AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Hanford-Corcoran, CA MSA Median Family Income (25260)				
2025 ($75,900)	<$37,950	$37,950 To <$60,720	$60,720 To <$91,080	>=$91,080
2024 ($75,900)	<$37,950	$37,950 To <$60,720	$60,720 To <$91,080	>=$91,080
2023 ($72,600)	<$36,300	$36,300 To <$58,080	$58,080 To <$87,120	>=$87,120
2022 ($68,000)	<$34,000	$34,000 To <$54,400	$54,400 To <$81,600	>=$81,600
Source: FFIEC				

Competition

The Kings AA has a low level of competition for financial services. According to the June 30, 2025 FDIC Deposit Market Share data, the AA had 10 financial institutions operating 12 branch offices with $1.6 billion in total deposits. The top 3 financial institutions control 49.8 percent of the AA market share. BOTS ranks 7th among competing financial institutions with $108.1 million in total deposits representing 6.8 percent market share.

Small business lending data reflects a moderate level of competition in the AA. In 2024, 58 lenders reported 1,641 small business loans totaling $36.6 million. Of these institutions, BOTS ranked 15th with 0.9 percent market share by number of loans and 12.8 percent market share by dollar volume. The top 3 institutions accounted for 44.8 percent of the market by number of reported small business loans.

Small farm lending data shows a low level of competition in the AA. In 2024, 17 lenders reported 122 small farm loans totaling $4.5 million. Of these institutions, BOTS ranked 8th with 2.5 percent market share by number of loans and 10.3 percent market share by dollar volume. The top 3 institutions maintained 52.5 percent of the market share by number of loans.

Santa Barbara AA

The Santa Barbara AA includes all CTs in Santa Barbara County, which is wholly contained within the Santa Maria-Santa Barbara, CA MSA #42200. The following table details changes to the AA CTs during the evaluation period as a result of the updated 2020 U.S. Census data release.

Santa Barbara AA	2015 ACS CTs		2020 U.S. Census CTs	
	#	%	#	%
Low	8	8.9	7	6.4
Moderate	23	25.6	28	25.7
Middle	23	25.6	30	27.5
Upper	32	35.6	38	34.9
N/A	4	4.4	6	5.5
Total	**90**	**100.0**	**109**	**100.0**
Source: 2015 ACS, 2020 U.S. Census				

Economic and Demographic Data

The following table illustrates select demographic, housing, business, and farm information within the Santa Barbara AA.

Demographic Information of the Assessment Area Santa Barbara County						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	109	6.4	25.7	27.5	34.9	5.5
Population by Geography	448,229	6.8	28.4	30.4	32.6	1.8
Housing Units by Geography	159,317	5.9	24.6	30.9	38.6	0.1
Owner-Occupied Units by Geography	77,504	1.3	16.7	36.0	46.1	0.0
Occupied Rental Units by Geography	70,805	11.0	34.4	25.7	28.8	0.1
Vacant Units by Geography	11,008	4.6	17.8	28.8	48.3	0.6
Businesses by Geography	45,703	2.9	18.4	27.8	50.4	0.5
Farms by Geography	1,119	1.7	14.4	33.0	50.9	0.1
Family Distribution by Income Level	97,397	22.0	18.1	18.4	41.5	0.0
Household Distribution by Income Level	148,309	23.7	16.6	17.6	42.0	0.0
Median Family Income MSA - 42200 Santa Maria-Santa Barbara, CA MSA		$89,549	Median Housing Value			$ 731,508
			Median Gross Rent			$1,757
			Families Below Poverty Level			7.1%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The top 3 largest industries in the AA are non-classifiable establishments at 17.3 percent; professional, scientific, and technical services at 11.8 percent; and other services (excluding public administration) at 9.0 percent of businesses. Additionally, 71.8 percent of area businesses have 4 or fewer employees and 92.8 percent of businesses operate from a single location.

The following table shows FFIEC-estimated median family incomes in the Santa Barbara AA.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
Santa Maria-Santa Barbara, CA MSA Median Family Income (42200)				
2025 ($119,100)	<$59,550	$59,550 To <$95,280	$95,280 To <$142,920	>=$142,920
2024 ($119,100)	<$59,550	$59,550 To <$95,280	$95,280 To <$142,920	>=$142,920
2023 ($107,300)	<$53,650	$53,650 To <$85,840	$85,840 To <$128,760	>=$128,760
2022 ($100,100)	<$50,050	$50,050 To <$80,080	$80,080 To <$120,120	>=$120,120
Source: FFIEC				

Competition

The Santa Barbara AA is moderately competitive for financial services. According to the June 30, 2025 FDIC Deposit Market Share data, the AA had 18 financial institutions operating 85 branch offices with $14.2 billion in total deposits. The top 3 financial institutions control 47.9 percent of the AA market share. BOTS ranks 17th among competing financial institutions with $52.4 million in total deposits representing 0.4 percent market share.

Small business lending data reflects a high level of competition in the AA. In 2024, 100 lenders reported 12,952 small business loans totaling $384.9 million. Of these institutions, BOTS ranked 56th with less than 0.1 percent market share by number of loans and 0.1 percent market share by dollar volume. The top 3 institutions accounted for 56.1 percent of the market by number of reported small business loans.

Small farm lending data shows low level of competition in the AA. In 2024, 15 lenders reported 183 small farm loans totaling $7.1 million. Of these institutions, BOTS ranked 8th with 1.6 percent market share by number of loans and 13.4 percent market share by dollar volume. The top 3 institutions maintained 66.7 percent of the market share by number of 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 (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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 (e.g., 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.