PUBLIC DISCLOSURE

November 2, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sterling Bank
Certificate Number: 57813

1100 Sterling Drive
Poplar Bluff, Missouri 63901

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Kansas City Regional Office

1100 Walnut Street, Suite 2100
Kansas City, Missouri 64106

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

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INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and the assessment areas' credit needs.

- The bank extended a majority of the small business and home mortgage loans reviewed in the assessment areas.

- Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment areas, considering performance context and other relevant factors.

- The distribution of borrowers reflects overall excellent penetration among businesses of different revenue sizes and individuals of different income levels, considering performance context and other relevant factors.

- The institution has not received any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

The Community Development Test is rated Outstanding.

- The institution's community development performance demonstrates excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

DESCRIPTION OF INSTITUTION

Sterling Bank is a commercial bank headquartered in Poplar Bluff, Missouri, with $1,296,643,000 in total assets as of June 30, 2020. The institution is wholly-owned by Sterling Bancshares, Inc., a one-bank holding company also located in Poplar Bluff. A "Satisfactory" CRA rating was assigned at the October 23, 2017 FDIC Performance Evaluation based on Interagency Intermediate Small Institution Examination Procedures.

The bank has 13 full-service offices in Missouri, Illinois, and Arkansas. The main office and two branches are in Poplar Bluff; eight offices are in the Missouri towns of Bernie, Campbell, Cape Girardeau, Chesterfield, Clayton, Kansas City, Malden, and Van Buren; one office in St. Charles, Illinois; and one office in Fayetteville, Arkansas.

In 2020, the bank opened one full-service branch each in Kansas City, Missouri, and Fayetteville, Arkansas. There was no significant impact of the new branches on the surrounding low- and moderate-income areas. There were no office closures during the review period

The institution provides a variety of deposit services including checking, savings, money market deposit accounts, certificates of deposit, individual retirement accounts, and health savings accounts. Sterling Bank also offers a variety of commercial, consumer residential real estate, agricultural, consumer secured, and consumer unsecured lending products. Alternative banking services include internet and mobile banking, electronic bill pay, and mobile deposit. The bank also has 12 deposit-taking automated teller machines (ATMs) at each of the full-service branches, with the exception of the Fayetteville branch. Since the previous evaluation, two deposit-taking units were added to the St. Charles and Kansas City branches.

According to the Consolidated Report of Condition and Income (Call Report) dated June 30, 2020, loans totaled approximately $964,710,000 and deposits totaled approximately $1,113,633,000. The following table reflects the bank's loan portfolio distribution by loan category.

Loan Portfolio Distribution as of 06/30/2020		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	289,146	30.0
Secured by Farmland	5,123	0.5
Secured by 1-4 Family Residential Properties	47,574	4.9
Secured by Multifamily (5 or more) Residential Properties	29,917	3.1
Secured by Nonfarm Nonresidential Properties	53,568	5.6
Total Real Estate Loans	**425,328**	**44.1**
Commercial and Industrial Loans	409,988	42.5
Agricultural Production and Other Loans to Farmers	4,133	0.4
Consumer Loans	8,897	0.9
Obligations of State and Political Subdivisions in the U.S.	105,210	10.9
Other Loans	11,154	1.2
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	**964,710**	**100.0**
Source: Reports of Condition and Income		

There were no financial, legal, or other impediments limiting the institution's ability to meet the credit needs of the assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Management has delineated six assessment areas in Missouri, Illinois, and Arkansas. These include the Southeast Missouri (SEMO), St. Louis, Cape Girardeau, and Kansas City assessment areas in Missouri; the St. Charles Assessment Area in Illinois; and the Fayetteville Assessment Area in Arkansas. The Kansas City and Fayetteville assessment areas will not be reviewed because these areas were created a few months prior to the evaluation. Therefore, examiners will determine the overall rating based on performance in the two rated areas of Missouri and Illinois, with the greatest weight being given to performance in Missouri**.** Refer to the rated areas and individual assessment areas for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated October 23, 2017, to the current evaluation dated November 2, 2020. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate Sterling Bank's current CRA performance. These procedures include a review of the institution's performance under the Lending Test and the Community Development Test.

Examiners performed a full-scope review of the institution's performance in the SEMO, St. Louis, Cape Girardeau, and St. Charles assessment areas. Examiners did not consider any affiliate activities during this evaluation.

Activities Reviewed

Examiners reviewed all small business loan data collected on the CRA Loan Application Register for 2018 and 2019 to evaluate commercial lending efforts. Specifically, examiners reviewed 262 loans totaling $43,608,000 in 2018, and 241 loans totaling $45,106,000 in 2019. Small business lending performance in 2018 and 2019 was compared to applicable D&B data and small business aggregate data. With the exception of the Assessment Area Concentration criterion, only 2018 small business loan data will be presented since the institution's lending performance was consistent through the review period. Furthermore, 2018 is the most recent full calendar year with aggregate data. The aggregate data provided additional comparative context for lending performance. Examiners also reviewed home mortgage loan data collected under the Home Mortgage Disclosure Act (HMDA) for 2018 and 2019 to evaluate residential real estate lending efforts. Specifically, examiners reviewed 82 loans totaling $39,159,000 for 2018, and 77 loans totaling $51,217,000 for 2019. Home mortgage lending performance in 2018 and 2019 was compared to 2015 American Community Survey (ACS) data and applicable HMDA aggregate lending data. With the exception of the Assessment Area Concentration criterion, only 2019 HMDA data will be presented since the institution's lending performance was consistent through the review period, and 2019 is the most recent full calendar year with aggregate data. Examiners gave substantially more weight to commercial lending, as this type of lending represents the bank's business strategy and comprises a larger percentage of the loan portfolio, based on dollar volume as of June 30, 2020. Agricultural lending will not be reviewed, as it represents a small percentage of the lending portfolio and is not the bank's primary lending focus.

For the Community Development Test, examiners reviewed bank data and records for community development loans, qualified investments, and community development services since the prior CRA evaluation dated October 23, 2017.

In early 2020, the Coronavirus pandemic began to spread, resulting in government-mandated business closings across the country. Unless otherwise noted, the economic impact of the pandemic on the assessment areas is unknown due to a lag in published data.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, Sterling Bank demonstrated satisfactory performance under the Lending Test. The bank's cumulative Lending Test performance in Missouri primarily supports this conclusion. The performance in Illinois is generally consistent with the overall rating.

Loan-to-Deposit Ratio

The loan-to-deposit (LTD) ratio, which is a measure of the overall level of lending by the bank, is reasonable given the institution's size, financial condition, and the credit needs of the assessment areas. The net LTD ratio averaged 89.7 percent over the past 11 calendar quarters from December 31, 2017, to June 30, 2020. The ratio ranged from a low of 85.5 percent as of June 30, 2020, to a high of 93.2 percent as of March 31, 2018.

The lending performance of similarly-situated lenders serves as an additional method of assessing the adequacy of a LTD ratio. A similarly-situated lender is defined as a financial institution that is in or

near the assessment areas and is the most comparable to the bank based on asset size, market served, product offerings, loan portfolio composition, and branching structure. Examiners identified three similarly-situated banks for this comparison with concurrence from management. The table below shows the bank's average net LTD is comparable to the similarly-situated institutions.

Loan-to-Deposit Ratio Comparison		
Bank	**Total Assets as of 6/30/2020 ($000s)**	**Average Net LTD Ratio (%)**
Sterling Bank, Poplar Bluff, Missouri	**1,296**	**89.7**
Montgomery Bank, Sikeston, Missouri	1,078	96.7
First State Community Bank, Farmington, Missouri	2,904	90.9
Southern Bank, Poplar Bluff, Missouri	2,529	98.4
Source: Reports of Condition and Income 12/31/17 through 6/30/20		

Assessment Area Concentration

As shown in the following table, Sterling Bank extended a majority of the loans reviewed, by number, in the assessment areas. Although the bank extended a majority of the home mortgage loans, by dollar amount, outside of the assessment areas, examiners concluded that the bank's performance is adequate. The vast majority of loans made outside of the assessment areas are large dollar loans that funded Low-Income Housing Tax Credit projects. In addition, small business lending performance contributed more weight to overall conclusions.

Lending Inside and Outside of the Assessment Area										
Loan Category	**Number of Loans**				**Total**	**Dollar Amount of Loans $(000s)**				**Total**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**	**#**	**$**	**%**	**$**	**%**	**$(000s)**
Small Business										
2018	229	87.4	33	12.6	262	31,550	72.3	12,058	27.7	43,608
2019	210	87.1	31	12.9	241	35,011	77.6	10,095	22.4	45,106
Subtotal	**439**	**87.3**	**64**	**12.7**	**503**	**66,561**	**75.0**	**22,153**	**25.0**	**88,714**
Home Mortgage										
2018	65	79.3	17	20.7	82	13,510	34.5	25,649	65.5	39,159
2019	63	81.8	14	18.2	77	6,233	12.2	44,983	87.8	51,217
Subtotal	**128**	**80.5**	**31**	**19.5**	**159**	**19,743**	**21.8**	**70,633**	**78.2**	**90,376**
Total	**567**	**85.6**	**95**	**14.4**	**662**	**86,304**	**48.2**	**92,785**	**51.8**	**179,090**
HMDA Evaluation Period: 1/1/2018 - 12/31/2019 *Small Business Evaluation Period: 1/1/2018 - 12/31/2019* *Due to rounding, totals may not equal 100.0%*										

Geographic Distribution

The geographic distribution of loans reflects reasonable penetration throughout the assessment areas. This conclusion is supported by the reasonable performance in Missouri, which received the most weight in the overall conclusion. Performance was consistent between Missouri and Illinois. Additional consideration of demographics, market competition from surrounding institutions, and other relevant information also aided in forming the conclusion. A complete discussion of the bank's lending performance for this criterion is included in the subsequent rated area sections of this evaluation.

Borrower Profile

The distribution of borrowers reflects excellent penetration among businesses of different sizes and retail customers of different income levels. This conclusion is supported by the excellent performance in Missouri, which received the most weight in the overall conclusion. Performance was not consistent between Missouri and Illinois, as performance in Illinois was assigned a rating of Satisfactory. Additional consideration of demographics, market competition from surrounding institutions, and other relevant information also aided in forming the conclusion. A complete discussion of the bank's lending performance for this criterion is included in the subsequent rated area sections of this evaluation.

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

Sterling Bank's community development performance demonstrates a high leadership position and excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. This conclusion is supported by excellent responsiveness to lending, investment, and service opportunities in Missouri. The institution's responsiveness to the same needs in Illinois was adequate.

Community Development Loans

Sterling Bank has a level of qualified community development loans that demonstrates excellent responsiveness to area needs, considering the opportunities in the assessment areas, levels of competition, and the capacity of the bank.

Sterling Bank originated or renewed 267 community development loans totaling approximately $367,346,000 that received consideration during this evaluation. Specifically, the bank made 171 community development loans totaling $142,334,000 in its assessment areas during the evaluation period, of which the largest dollar volume of lending benefited the St. Louis Assessment Area. In addition, a significant volume of community development loans provided benefits to the broader statewide regional area (BSRA).

These community development loans represented 28.3 percent of total assets and 38.1 percent of the bank's net loans, as of June 30, 2020. Examiners compared the bank's ratios to three other intermediate small institutions operating in Missouri. The community development loans to total assets ratios for those banks ranged from 13.3 percent to 20.3 percent, and the community development loans to net loans ratios ranged from 10.5 percent to 30.8 percent. Community development lending activity includes 145 Small Business Administration (SBA) Paycheck Protection Program (PPP) loans totaling approximately $17.8 million. These loans helped to promote economic development by financing small businesses as they struggle with the impact of the Coronavirus pandemic. The bank's community development loans to net loans and community development loans to total asset ratios compare very favorably to the ratios of similarly-situated institutions. However, the comparable institutions' community development lending activity does not include PPP loans due to the timing of the data collected. Nevertheless, it is important to note that the bank's percentage of community development loans to net loans and to total assets compares very favorably to these institutions, even when the PPP loans are excluded from the analysis.

The following tables reflect the number and dollar volume of community development lending extended by assessment area, community development category, and activity year. These tables also identify lending activities in the BSRA.

Community Development Lending by Assessment Area

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
SEMO	6	160	0	0	30	18,648	61	14,429	**97**	**33,237**
St. Louis	18	50,172	0	0	17	10,679	13	34,000	**48**	**94,851**
Cape Girardeau	1	11,717	0	0	9	642	1	62	**11**	**12,421**
St. Charles	0	0	0	0	15	1,825	0	0	**15**	**1,825**
BSRA	34	187,844	0	0	46	22,397	16	14,771	**96**	**225,012**
Total	**59**	**249,893**	**0**	**0**	**117**	**54,191**	**91**	**63,262**	**267**	**367,346**

Source: Bank Data

Community Development Lending

Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
2017	4	12,665	0	0	0	0	3	3,050	**7**	**15,715**
2018	19	110,092	0	0	15	18,224	3	3,279	**37**	**131,595**
2019	18	63,675	0	0	18	12,070	10	23,946	**46**	**99,691**
YTD 2020	18	63,461	0	0	84	23,897	75	32,987	**177**	**120,345**
Total	**59**	**249,893**	**0**	**0**	**117**	**54,191**	**91**	**63,262**	**267**	**367,346**

Source: Bank Data

The following are qualitative examples of the community development loans provided by Sterling Bank:

- Between 2017 and 2020, the bank originated or renewed 35 loans, totaling $235,580,000, which supported the development of Low-Income Housing Tax Credit projects that benefitted both the assessment areas and the BSRA.

Qualified Investments

Sterling Bank has a level of qualified community development investments and donations that demonstrates excellent responsiveness to area needs, considering the opportunities in the assessment areas, levels of competition, and the capacity of the bank.

The bank made 315 qualified investments, including donations and grants, totaling approximately $4,303,000 that received consideration at this evaluation. The bank's qualified investment activity included 68 donations totaling $4,042,000. This activity also included $774,000 of investments originated prior to the previous evaluation that were outstanding as of the date of this evaluation.

These qualified investments represented 0.3 percent of total assets and 8.5 percent of total securities, as of June 30, 2020. For the three other intermediate small institutions previously mentioned, the qualified investments to total assets ratios ranged from 0.5 percent to 1.4 percent and the qualified investments to total securities ratios ranged from 3.1 percent to 8.8 percent.

The following tables reflect the number and dollar volume of qualified investments extended by assessment area, community development category, and activity year. These tables also identify investment activities in the BSRA.

Qualified Investments by Assessment Area

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
SEMO	0	0	184	140	8	6	8	4	**200**	**150**
St. Louis	14	2,259	42	79	8	11	0	0	**64**	**2,349**
Cape Girardeau	2	1	20	20	0	0	0	0	**22**	**21**
St. Charles	0	0	7	14	0	0	0	0	**7**	**14**
BSRA	12	1,751	10	18	0	0	0	0	**22**	**1,769**
Total	**28**	**4,011**	**263**	**271**	**16**	**17**	**8**	**4**	**315**	**4,303**

Source: Bank Data

Qualified Investments										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	1	774	0	0	0	0	0	0	**1**	**744**
2017	2	128	0	0	0	0	0	0	**2**	**128**
2018	3	3,038	22	37	0	0	0	0	**25**	**3,075**
2019	0	0	17	25	0	0	0	0	**17**	**25**
YTD 2020	0	0	23	40	0	0	0	0	**23**	**40**
Subtotal	**6**	**3,940**	**62**	**102**	**0**	**0**	**0**	**0**	**68**	**4,042**
Qualified Grants & Donations	22	71	201	169	16	17	8	4	**247**	**261**
Total	**28**	**4,011**	**263**	**271**	**16**	**17**	**8**	**4**	**315**	**4,303**
Source: Bank Data										

Community Development Services

The qualified community development services of the employees and management of Sterling Bank demonstrated an innovative approach and excellent responsiveness to area needs, considering the opportunities in the assessment areas, levels of competition, and the capacity of the bank.

The bank received consideration for a total of 175 community development services that primarily consisted of bank employees providing financial expertise to community development-related organizations within the assessment areas, and bank employee involvement in teaching financial literacy classes at local schools and local community-focused events.

For the three other intermediate small institutions previously mentioned, the community development services considered ranged from 158 to 239. The following tables illustrate the bank's community development services by activity year, assessment area, and by community development category.

Community Development Services by Assessment Area					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
SEMO	2	40	3	15	**60**
ST. Louis	21	51	13	15	**100**
Cape Girardeau	2	7	0	0	**9**
St. Charles	0	0	0	0	**0**
BSRA	0	6	0	0	**6**
Total	**25**	**104**	**16**	**30**	**175**
Source: Bank Data					

Community Development Services					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
2017	3	5	4	1	**13**
2018	9	27	4	11	**51**
2019	9	43	3	13	**68**
YTD 2020	4	29	5	5	**43**
Total	**25**	**104**	**16**	**30**	**175**
Source: Bank Data					

The bank offers various small business and personal retail credit and deposit products. Additionally, the institution strives to serve the entirety of local communities by providing expanded channels of banking capabilities through mobile and online means. Since the previous evaluation, the bank added several new retail products to meet the needs of the community, more specifically the low- and moderate-income borrowers or properties in low- or moderate-income geographies. These products include the Home Advantage Mortgage Product, Home Refresh Home Improvement Loan, and Credit Builder CD Loan. Additionally, Sterling Bank requires borrowers to complete a financial education curriculum to close the Home Advantage Mortgage Product. Costs associated with the program are fully funded by the bank. Since their introduction, a total of 20 Home Advantage loans, 10 Home Refresh loans, and 17 Credit Builder CD loans have been made.

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.

MISSOURI– Full Scope Review

CRA RATING FOR MISSOURI: SATISFACTORY

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Outstanding

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

Sterling Bank's operations in Missouri consists of the SEMO, St. Louis, and Cape Girardeau assessment areas. There were no assessment areas added or removed during the review period.

SCOPE OF EVALUATION – MISSOURI

Examiners performed a full-scope analysis on the SEMO, St. Louis, and Cape Girardeau assessment areas. Performance in Missouri was based on a review of small business and home mortgage lending and a review of community development loans, investments, and services. Additionally, the greatest weight was given to performance in the SEMO Assessment Area, since this area constitutes a substantial majority of the bank's loans, deposits, and branching structure.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MISSOURI

LENDING TEST

Sterling Bank demonstrated satisfactory performance under the Lending Test in Missouri. The bank's cumulative Lending Test performance in the SEMO Assessment Area primarily supports this conclusion. The performance in the remaining assessment areas in Missouri is generally consistent with the overall rating.

Geographic Distribution
The geographic distribution of loans reflects overall reasonable dispersion throughout the assessment areas in Missouri. This conclusion is primarily supported by the reasonable performance in the SEMO Assessment Area, which received the most weight in the overall conclusion. While performance in the St. Louis Assessment Area was excellent, performance in this assessment area contributed less weight to overall conclusions. Refer to the separate Missouri assessment area sections for details regarding the loan products reviewed and related conclusions.

Borrower Profile
The distribution of borrowers reflects, given the demographics of the assessment areas in Missouri, excellent penetration among businesses of different sizes and individuals of different income levels. This conclusion is primarily supported by the excellent performance in the SEMO Assessment Area, which received the most weight in the overall conclusion. Performance was not consistent between all assessment areas in Missouri. Performance in the SEMO and Cape Girardeau assessment areas was excellent while performance in the St. Louis Assessment Area was reasonable. Refer to the separate Missouri assessment area sections for details regarding the loan products reviewed and related conclusions.

COMMUNITY DEVELOPMENT TEST

Sterling Bank demonstrated excellent responsiveness to the community development needs in Missouri through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities in evaluating the bank's performance under this test.

Community Development Loans

Sterling Bank has made a high level of community development loans in Missouri. Specifically, the bank originated or renewed a combined total of 156 loans totaling $140,509,000 during the evaluation period that benefited the assessment areas in Missouri. These loans support community development through affordable housing; activities that promote economic development by creating or retaining jobs; and efforts to revitalize or stabilize low- and moderate-income or distressed and/or underserved geographies. Community development activity, by number of activities in each assessment area, correlates with the bank's activity within each respective assessment area. Although the dollar amount of the loans in the St. Louis Assessment Area far exceeds performance in the SEMO Assessment Area, this activity is a reflection of the needs within the St. Louis Assessment Area. Refer to the separate Missouri assessment area sections for specific details.

Qualified Investments

Sterling Bank has made a high level of qualified investments and donations in Missouri. Specifically, a combined total of 286 investments and donations, totaling $2,520,000, were funded that benefited the assessment areas of Missouri. These activities support community development through affordable housing; community service initiatives that primarily benefit low- and moderate-income individuals; activities that promote economic development by creating or retaining jobs; and efforts to revitalize or stabilize low- and moderate-income or distressed and/or underserved geographies. Refer to the separate Missouri assessment area sections for specific details.

Community Development Services

Sterling Bank has made a high level of community development services in Missouri. These activities support community development through affordable housing; community service initiatives that primarily benefit low- and moderate-income individuals; activities that promote economic development by creating or retaining jobs; and efforts to revitalize or stabilize low- and moderate-income or distressed and/or underserved geographies. Refer to the separate Missouri assessment area sections for specific details.

SEMO – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SEMO

The SEMO Assessment Area consists of the entirety of Butler, Carter, Ripley and Wayne counties; and portions of Dunkin, New Madrid, Reynolds, Shannon, and Stoddard counties. Additionally, the assessment area contains the bank's main branch as well as six additional branches, representing 53.8 percent of the bank's total branching structure. Three of the branches are located in moderate-income census tracts, while the remaining four are in middle-income census tracts.

Since the previous evaluation, management performed a lending-focused analysis on the SEMO Assessment Area and deemed it necessary to remove the following individual census tracts: 4701.00 of Shannon County; 3801.00 of Reynold County; 4701.00 of Stoddard County, 9601.00-9603.00 of New Madrid County; and 3605.00-3610.00 of Dunkin County. These changes did not result in any CRA-related concerns.

Economic and Demographic Data

Based on 2015 ACS Census data, the SEMO Assessment Area consists of 36 census tracts, which is comprised of 13 moderate-, 22 middle-, and one upper-income census tract. The following table illustrates select demographic characteristics of this assessment area based on 2015 ACS Census data and 2018 D&B data.

Demographic Information of the SEMO Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	36	0.0	36.1	61.1	2.8	0.0
Population by Geography	133,361	0.0	30.6	67.2	2.3	0.0
Housing Units by Geography	63,961	0.0	31.9	66.0	2.1	0.0
Owner-Occupied Units by Geography	36,382	0.0	27.0	70.2	2.8	0.0
Occupied Rental Units by Geography	16,435	0.0	40.0	58.9	1.0	0.0
Vacant Units by Geography	11,144	0.0	35.8	63.0	1.2	0.0
Businesses by Geography	5,928	0.0	31.7	66.1	2.2	0.0
Farms by Geography	601	0.0	26.5	66.1	7.5	0.0
Family Distribution by Income Level	34,721	23.9	20.1	20.9	35.1	0.0
Household Distribution by Income Level	52,817	27.1	17.4	19.0	36.4	0.0
Median Family Income Non-MSAs – MO		$48,553	Median Housing Value			$83,963
			Median Gross Rent			$564
			Families Below Poverty Level			15.4%

Source: 2015 ACS and 2018 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Service industries represent the largest portion of businesses in the assessment area at 32.7 percent; followed by non-classifiable establishments (15.4 percent); and retail trade (14.4 percent). In addition, 60.1 percent of area businesses have four or fewer employees and 85.4 percent operate from a single location.

The 2019 FFIEC-updated median family income figure for the SEMO Assessment Area was also used to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories. These categories are based on the 2019 FFIEC-updated median family income figure of $52,400.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
MO NA Median Family Income (99999)				
2019 ($52,400)	<$26,200	$26,200 to <$41,920	$41,920 to <$62,880	≥$62,880
Source: FFIEC				

Competition

Overall, there is a moderate level of competition for financial services in the SEMO Assessment Area considering all relevant data. According to 2019 Reports of Condition data filed by financial institutions, there are 25 financial institutions that operate a total of 92 branches within the assessment area. Of these institutions, Sterling Bank ranked second in market share with 9.1 percent of the assessment area's deposits.

Review of 2018 CRA and 2019 HMDA aggregate lending data illustrates the level of competition and demand for small business and home mortgage loans in the area. Specifically, 66 lenders reported 2,225 small business loans originated in the assessment area. Sterling Bank ranked 3rd out of this group of lenders, with a market share of 8.4 percent. This level of activity represented a high level of competition in the assessment area. Additionally, 139 lenders reported 2,524 residential mortgage loans originated or purchased in the assessment area. Sterling Bank ranked 12th out of this group of lenders with a market share of 2.0 percent. This level of activity represented a high level of competition in the assessment area.

Community Contact

Examiners reviewed an existing community contact conducted by regulatory personnel in the prior twelve months. Examiners considered the information provided by this community contact, which is summarized below, in analyzing the institution's CRA performance.

The contact was completed prior to the Coronavirus pandemic in February 2020 with a representative from a non-profit organization focused on economic development concentrated on a large portion of the assessment area. The contact noted that both the population and economic center of the area remained within the metropolitan area of Poplar Bluff of Butler County. Retail growth in Butler County was described as modest, and mostly focused in the area surrounding the Poplar Bluff Regional Medical Center. The contact noted the vast majority of these employment opportunities were generally lower paying retail positions. The climate for small businesses was considered good, and local banks were described as meeting their lending needs. Despite the economic successes of the area, the contact described roughly a quarter of the population as living at or below the poverty line. Historically, the population in the surrounding communities tended to commute to Poplar Bluff due to the large number of moderate-income job opportunities. However, it was noted in regards to housing, Butler County had adequate stock and supply, whereas the surrounding communities had low supply and limited options. The contact noted a correlation between the housing availability and a growing trend for residents from the surrounding communities to move to Poplar Bluff. The contact supported this theory with the results of a housing study conducted in June 2019. This study noted a population decline in Carter, Ripley, Reynolds, and Wayne Counties. Additionally, results from the study noted elevated vacancy rates

in Carter, Reynolds, and Wayne counties. The conclusion also noted the impact of the 2017 flooding and the resulting shortage of safe, sanitary, and affordable housing in the counties studied. Finally, the study concluded that lower wages in the area impeded resident's ability to attain affordable housing due to the costs of housing construction and down-payment requirements for qualified borrowers.

Credit and Community Development Needs and Opportunities

Bank management described the overall economy in the assessment area and overall loan demand as stable. Poplar Bluff is now considered a Metropolitan Area by the Office of Budget Management. This designation was extended to Poplar Bluff because it is the regional economic and employment hub of the area. Furthermore, Poplar Bluff provides multiple amenities on a manageable scale and attracts jobs; restaurants; and community organizations. Primary credit needs of the SEMO Assessment Area included commercial, residential, agricultural and consumer products.

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that commercial loans, home mortgage loans, and, to a lesser extent, agricultural and consumer loans represent the primary credit needs in the assessment area. Opportunities exist for originating such loans, as indicated by the percentages of small businesses and families in the assessment area. As indicated by the community contact, community development needs and opportunities exist, including a need for additional affordable housing and credit counseling and financial literacy training.

CONCLUSIONS ON PERFORMANCE CRITERIA IN SEMO

LENDING TEST

Sterling Bank demonstrated reasonable performance under the Lending Test in the SEMO Assessment Area. The bank's cumulative Lending Test performance factors support this conclusion.

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The assessment area does not include any low-income geographies. Therefore, the results of the review are based on the dispersion of loans in the assessment area's moderate-income census tracts and relevant contextual information.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Although Sterling Bank's lending performance in moderate-income census tracts lags aggregate data, examiners considered additional contextual factors which impacted the bank's performance. As noted by the community contact, the vast majority of recent economic growth was in the areas surrounding the Popular Bluff Regional Medical Center, which is located in a middle-income census tract. Furthermore, the census tracts adjacent to that portion of the aforementioned census tract are also middle-income. Additionally, only 3 of the 13 moderate-income geographies in the assessment area are in close proximity to Poplar Bluff. Finally, there is a high level of competition in the assessment area. Sterling Bank's lending activity in the moderate-income geographies of the

SEMO Assessment Area are reasonable when considering the additional information. The following table provides details.

Geographic Distribution of Small Business Loans SEMO Assessment Area						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Moderate	31.7	28.3	37	19.9	6,274	28.5
Middle	66.1	68.7	143	76.9	15,620	70.9
Upper	2.2	2.9	6	3.2	122	0.6
Totals	**100.0**	**100.0**	**186**	**100.0**	**22,016**	**100.0**
Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*						

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. Although Sterling Bank's lending performance in moderate-income census tracts lags aggregate data, examiners considered additional contextual factors impacting the bank's performance. As noted by the community contact and bank management, the population of the area has shifted towards Popular Bluff from the surrounding communities. Additionally, only three of the 13 moderate-income geographies in the assessment area are in close proximity to Poplar Bluff. These changes created additional barriers on the bank's performance in the aforementioned census tracts. Furthermore, there is a high level of competition in the assessment area. Sterling Bank's lending activity in the moderate-income geographies of the SEMO Assessment Area is reasonable when considering the additional information. The following table provides details.

Geographic Distribution of Home Mortgage Loans SEMO Assessment Area						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Moderate	27.0	22.2	9	17.6	823	18.3
Middle	70.2	75.0	40	78.4	3,574	79.3
Upper	2.8	2.7	2	3.9	109	2.4
Totals	**100.0**	**100.0**	**51**	**100.0**	**4,506**	**100.0**
Source: 2015 ACS; Bank Data; 2019 HMDA Aggregate Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*						

Borrower Profile

Overall, the distribution of borrowers reflects excellent penetration of lending to businesses with gross annual revenues of $1 million or less and low- and moderate-income borrowers. The bank's small business lending performance, which carried the most weight, primarily supports this conclusion.

Small Business Loans

The distribution of small business loans reflects excellent penetration among businesses of different revenue sizes in the assessment area. The lending performance to businesses with gross annual revenues of $1 million or less, based on the number of loans, substantially exceeds aggregate lending data. The following table provides details.

Distribution of Small Business Loans by Gross Annual Revenue Category

SEMO Assessment Area

Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	$(000s)	%
<=$1,000,000	76.7	55.6	141	75.8	11,676	53.0
>1,000,000	6.3	--	41	22.0	9,816	44.6
Revenue Not Available	17.0	--	4	2.2	524	2.4
Totals	**100.0**	**100.0**	**186**	**100.0**	**22,016**	**100.0**

Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The distribution of home mortgage lending in the assessment area reflects reasonable penetration to individuals of different income levels, including low- and moderate-income individuals. Although the lending percentages to low- income borrowers, based on the number of loans, slightly lags aggregate lending data, the performance to moderate-income borrowers exceeds aggregate performance. The following table provides details.

Distribution of Home Mortgage Loans by Borrower Income Level

SEMO Assessment Area

Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	$(000s)	%
Low	23.9	7.8	3	5.9	181	4.0
Moderate	20.1	16.3	9	17.6	746	16.6
Middle	20.9	18.4	5	9.8	313	6.9
Upper	35.1	32.8	30	58.8	3,014	66.9
Not Available	0.0	24.7	4	7.8	252	5.6
Totals	**100.0**	**100.0**	**51**	**100.0**	**4,506**	**100.0**

Source: 2015 ACS; Bank Data, 2018 & 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

COMMUNITY DEVELOPMENT TEST

Sterling Bank demonstrated excellent responsiveness to the community development needs of the SEMO Assessment Area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities in evaluating the bank's performance under this test.

Community Development Loans

Sterling Bank has made a high level of community development loans in the SEMO Assessment Area. Specifically, the bank originated or renewed 97 loans totaling $33,237,000 during the evaluation period that benefited this assessment area. The loans made served to provide affordable housing, revitalize and stabilize low- and moderate-income geographies, and promote economic development by creating or retaining jobs. This level of lending represents a significant increase from the previous evaluation in which the bank received consideration for 7 loans totaling $14,148,000.

Qualified Investments

During the evaluation period, a total of 200 investments and donations were funded totaling $150,000 in the SEMO Assessment Area. The bank promoted community development through investments and donations that served to provide community services targeted to low- and moderate-income individuals, revitalize and stabilize low- and moderate-income geographies, and promote economic development. This level of qualified investments and donations represents an increase in the number of activities and a decrease in the total dollar amount from the previous evaluation in which the bank received consideration for 122 activities totaling $879,000.

Community Development Services

The bank received consideration for a total of 60 community development services that benefitted organizations within the assessment areas. The qualifying activities served to provide affordable housing, community services targeted to low- and moderate-income individuals, revitalize and stabilize low- and moderate-income geographies, and promote economic development by creating or retaining jobs. These community development services consisted of active participation by 20 bank employees with 25 different organizations performing services that meet the definition of community development under the CRA. This level of activity represents a significant increase in the number of qualified activities from the previous evaluation in which the bank received consideration for 20 activities.

ST. LOUIS – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ST. LOUIS

The St. Louis Assessment Area consists of the entirety of the City of St. Louis and St. Louis County, both located in the Missouri portion of the St. Louis, Missouri-Illinois MSA. The assessment area contains two of the bank's branches, both located in upper-income census tracts.

Economic and Demographic Data

Based on 2015 ACS data, the St. Louis Assessment Area consists of 305 census tracts, which are comprised of 56 low-, 70 moderate-, 80 middle-, and 96 upper-income census tracts. Three of the census tracts are designated as N/A. The following table illustrates select demographic characteristics of this assessment area based on 2015 ACS Census data and 2018 D&B data.

Demographic Information of the St. Louis Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	305	18.4	23.0	26.2	31.5	1.0
Population by Geography	1,319,177	12.9	22.2	28.4	35.9	0.6
Housing Units by Geography	613,667	14.6	22.8	29.0	33.1	0.5
Owner-Occupied Units by Geography	343,365	7.2	19.5	30.6	42.4	0.2
Occupied Rental Units by Geography	198,029	20.7	27.1	29.3	21.9	1.0
Vacant Units by Geography	72,273	32.8	26.8	20.7	19.2	0.5
Businesses by Geography	92,290	7.7	17.9	25.5	47.3	1.7
Farms by Geography	1,603	4.6	16.2	28.8	49.5	0.9
Family Distribution by Income Level	326,465	23.5	16.6	18.2	41.8	0.0
Household Distribution by Income Level	541,394	26.3	16.3	16.6	40.8	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		$70,718	Median Housing Value			$178,881
			Median Gross Rent			$843
			Families Below Poverty Level			10.7%

Source: 2015 ACS and 2018 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Service industries represent the largest portion of businesses in the assessment area at 43.2 percent; followed by non-classifiable establishments (16.6 percent); and retail trade (11.6 percent). In addition, 60.6 percent of area businesses have four or fewer employees and 88.0 percent operate from a single location.

The 2019 FFIEC-updated median family income figure for the St. Louis Assessment Area was also used to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories. These categories are based on the 2019 FFIEC-updated median family income figure of $81,200.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
St. Louis, MO-IL MSA Median Family Income (41180)				
2019 ($81,200)	<$40,600	$40,600 to <$64,960	$64,960 to <$97,440	≥$97,440
Source: FFIEC				

Competition

Overall, there is a high level of competition for financial services in the St. Louis Assessment Area considering all relevant data. According to 2019 Reports of Condition data filed by financial institutions, there are 56 financial institutions that operate a total of 398 branches within the assessment area. Of these institutions, Sterling Bank ranked 20th in market share with less than one percent of the assessment area's deposits.

Review of 2018 CRA and 2019 HMDA aggregate lending data illustrates the level of competition and demand for small business and home mortgage loans in the area. Specifically, 139 lenders reported 31,400 small business loans originated in the assessment area. Sterling Bank ranked 70th out of this group of lenders, with a market share of less than one percent. This level of activity represents a high level of competition in the assessment area. Additionally, 479 lenders reported 53,292 residential mortgage loans originated or purchased in the assessment area. Sterling Bank ranked 231st out of this group of lenders with a market share of less than one percent. This level of activity represents a high level of competition in the assessment area.

Community Contact

Examiners reviewed an existing community contact conducted by regulatory personnel in the prior twelve months. Examiners considered the information provided by this community contact, which is summarized below, in analyzing the institution's CRA performance.

The contact was completed prior to the Coronavirus pandemic in January 2020 with a representative from a non-profit organization focused on community development within metropolitan St. Louis. The economic condition was described as good despite the lower levels of high quality jobs from recent job growth. The environment of the area supported the ability for small local business growth. The contact noted difficulty for small businesses to get small dollar loans if they leased or rented their location. The contact stated there was a lack of affordable housing in St. Louis and attributed this to the halt of the Missouri Low-Income Housing Tax Credit program. Although the contact noted a concentration of rental properties in low and moderate-income areas, the contact described a decrease in the number of two- to four-family buildings, with many of those units having been converted to single family homes. The contact also noted that the quality of Section 8 housing was poor due to a lack of funds for maintenance and improvements. Furthermore, income levels of most in the area were adequate enough to maintain rent and utilities payments; however, it was not high enough to obtain financing to become a homeowner. The contact indicated there was a need for micro-loans for small businesses and residential loan products for first-time home buyers. The contact acknowledged financial educational opportunities offered by local institutions; however, they also noted that these opportunities were normally held outside of low- and moderate-income areas. Additionally, the contact noted the need for additional bilingual support in the assessment area.

Credit and Community Development Needs and Opportunities

Bank management described the overall economy in the assessment area as strong prior to the pandemic. Since the pandemic, the economy appears to be improving; however, there are notable areas of economic deterioration. Furthermore, unemployment has tripled since the start of the pandemic. The hospitality and entertainment sectors of the area have been deeply impacted by the pandemic. Most businesses in these categories either remain closed or are operational at half of

their former revenue levels. Businesses categorized as construction, grocery, and pharmaceutical have not been as deeply impacted. Management has noted the strongest demand for small business lending. Additionally, management described the demand for home loans as strong.

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that commercial and home mortgage loans represent the primary credit needs in the assessment area. Opportunities exist for originating such loans, as indicated by the percentages of small businesses and families in the assessment area. As indicated by the community contacts, community development needs and opportunities exist, including a need for additional affordable housing and credit counseling and financial literacy training.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ST. LOUIS

LENDING TEST

Sterling Bank demonstrated reasonable performance under the Lending Test in the St. Louis Assessment Area. The bank's cumulative Lending Test performance factors support this conclusion.

Geographic Distribution

Overall, the geographic distribution of loans reflects excellent dispersion throughout the St. Louis Assessment Area. Small business and home mortgage lending performance support this conclusion. Consideration was given to the dispersion of these loans in the assessment area's low- and moderate-income census tracts.

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the assessment area. Sterling Bank's lending performance, based on number of loans, in the low-income geographies exceeds aggregate performance, while performance in the moderate-income census tracts significantly exceeds aggregate data. The following table provides details.

Geographic Distribution of Small Business Loans

St. Louis Assessment Area

Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	$(000s)	%
Low	7.7	6.4	2	11.8	770	11.8
Moderate	17.9	17.4	8	47.1	2,959	45.4
Middle	25.5	25.2	1	5.9	667	10.2
Upper	47.3	49.6	6	35.3	2,115	32.5
Not Available	1.7	1.5	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**17**	**100.0**	**6,511**	**100.0**

Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. Specifically, Sterling Bank's lending performance in the low- and moderate-income census tracts, based on the number of loans, significantly exceeds aggregate performance. The following table provides details.

Geographic Distribution of Home Mortgage Loans St. Louis Assessment Area						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	7.2	2.7	3	33.3	251	19.5
Moderate	19.5	14.0	3	33.3	420	32.6
Middle	30.6	30.5	3	33.3	617	47.9
Upper	42.4	52.5	0	0.0	0	0.0
Not Available	0.3	0.2	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**9**	**100.0**	**1,288**	**100.0**

Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and individuals of different income levels in this assessment area, given the institution's business strategy. Examiners focused on the percentage, by number, of small business loans to businesses with GARs of $1 million or less and the percentage, by number, of home mortgage loans to low- and moderate-income borrowers.

Small Business Loans

Sterling Bank's distribution of borrowers reflects reasonable penetration among businesses of different revenue size. The lending performance to businesses with gross annual revenues of $1 million or less, based on the number of loans, exceeds aggregate lending data. The following table presents the distribution of small business loans originated inside the St. Louis Assessment Area.

Distribution of Small Business Loans by Gross Annual Revenue Category St. Louis Assessment Area						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	79.8	44.5	9	52.9	2,659	40.8
>1,000,000	8.4	--	8	47.1	3,852	59.2
Revenue Not Available	11.8	--	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**17**	**100.0**	**6,511**	**100.0**
Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%*						

Home Mortgage Loans

The distribution of home mortgage lending in the assessment area reflects reasonable penetration to individuals of different income levels, including low- and moderate-income individuals. Although there were no loans originated to moderate-income borrowers, the lending, by number of loans, to low-income borrowers substantially exceeds pertinent aggregate lending performance. The following table presents the distribution of home mortgage loans originated inside the St. Louis Assessment Area.

Distribution of Home Mortgage Loans by Borrower Income Level St. Louis Assessment Area						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	23.5	8.4	2	22.2	150	11.6
Moderate	16.6	16.7	0	0.0	0	0.0
Middle	18.2	18.5	0	0.0	0	0.0
Upper	41.8	39.9	0	0.0	0	0.0
Not Available	0.0	16.5	7	77.8	1,138	88.4
Totals	**100.0**	**100.0**	**9**	**100.0**	**1,288**	**100.0**
Source: 2015 ACS; Bank Data, 2018 & 2019 HMDA Aggregate Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*						

COMMUNITY DEVELOPMENT TEST

Sterling Bank demonstrated excellent responsiveness to the community development needs of the St. Louis Assessment Area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities in evaluating the bank's performance under this test.

Community Development Loans

Sterling Bank has made an adequate level of community development loans in the St. Louis Assessment Area. Specifically, the bank originated or renewed 48 loans totaling $94,851,000 during the evaluation period that benefited this assessment area. The loans provided affordable housing, revitalized and stabilized low- and moderate-income geographies, and promoted economic development by creating or retaining jobs. This level of lending represents an increase in the number of loans and a decrease in total dollar amount from the previous evaluation where the bank received consideration for 29 loans totaling $178,066,000.

Qualified Investments

During the evaluation period, a total of 64 investments and donations were funded totaling $2,349,000 in the St. Louis Assessment Area. The bank promoted community development through investments and donations that provided affordable housing and community services targeted to low- and moderate-income individuals, revitalized and stabilized low- and moderate-income geographies, and promoted economic development. This level of qualified investments and donations represents a significant increase since the previous evaluation in which the bank received consideration for 28 activities totaling $689,000.

Community Development Services

The bank received consideration for a total of 100 community development services that primarily consisted of bank employees providing financial expertise to community development-related organizations within the assessment areas. The qualifying activities provided affordable housing and community services targeted to low- and moderate-income individuals, revitalized and stabilized low- and moderate-income geographies, and promoted economic development by creating or retaining jobs. These community development services consisted of active participation by nine bank employees with 41 different organizations performing services that meet the definition of community development. This level of activity represents a significant increase in the number of qualified activities from the previous evaluation which the bank received consideration for 31 activities.

CAPE GIRARDEAU – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CAPE GIRARDEAU

The Cape Girardeau Assessment Area consists of a portion of Cape Girardeau County. This county resides in the Cape Girardeau, Missouri-Illinois MSA. Additionally, the assessment area contains one of the bank's branches, which is located in a middle-income census tract.

Economic and Demographic Data

Based on 2015 ACS Census data, the assessment area consists of 15 census tracts, comprised of one low-, three moderate-, eight middle-, and three upper-income census tracts. The following table illustrates select demographic characteristics of this assessment area based on 2015 ACS Census data and 2018 D&B data.

Demographic Information of the Cape Girardeau Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	15	6.7	20.0	53.3	20.0	0.0
Population by Geography	73,599	3.4	10.8	65.3	20.6	0.0
Housing Units by Geography	31,455	4.3	12.0	62.2	21.6	0.0
Owner-Occupied Units by Geography	17,982	2.1	6.8	66.5	24.5	0.0
Occupied Rental Units by Geography	10,409	7.0	18.5	56.8	17.6	0.0
Vacant Units by Geography	3,064	7.3	19.7	55.6	17.5	0.0
Businesses by Geography	5,009	3.9	10.1	65.5	20.4	0.0
Farms by Geography	271	0.4	1.8	86.0	11.8	0.0
Family Distribution by Income Level	17,848	20.2	15.7	21.1	43.0	0.0
Household Distribution by Income Level	28,391	23.2	15.8	16.7	44.2	0.0
Median Family Income MSA - 16020 Cape Girardeau, MO-IL MSA		$56,012	Median Housing Value			$136,147
			Median Gross Rent			$699
			Families Below Poverty Level			11.9%

Source: 2015 ACS and 2018 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Service industries represent the largest portion of businesses in the assessment area at 40.5 percent; followed by retail trade (14.6 percent); and non-classifiable establishments (13.1 percent). In addition, 61.0 percent of area businesses have four or fewer employees and 85.0 percent operate from a single location.

The 2019 FFIEC-updated median family income figure for the Cape Girardeau Assessment Area was used to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories. These categories are based on the 2019 FFIEC-updated median family income figure of $63,600.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Cape Girardeau, MO-IL MSA Median Family Income (16020)				
2019 ($63,600)	<$31,800	$31,800 to <$50,880	$50,880 to <$76,320	≥$76,320
Source: FFIEC				

Competition

Overall, there is a high level of competition for financial services in the Cape Girardeau Assessment Area considering all relevant data. According to 2019 Reports of Condition data filed by financial institutions, there are 15 financial institutions that operate a total of 39 branches within the

assessment area. Of these institutions, Sterling Bank ranked 14th in market share with 3.3 percent of the assessment area's deposits.

Review of 2018 CRA and 2019 HMDA aggregate lending data illustrates the level of competition and demand for small business and home mortgage loans in the area. Specifically, 58 lenders reported 1,779 small business loans originated in the assessment area. Sterling Bank ranked 19th out of this group of lenders, with a market share of 2.2 percent. This level of activity represents a high level of competition. Additionally, 158 lenders reported 2,661 residential mortgage loans originated or purchased in the assessment area. Sterling Bank ranked 73rd out of this group of lenders with a market share of less than one percent. This level of activity represents a high level of competition considering the size of the area served.

Credit and Community Development Needs and Opportunities

Management indicated that the Cape Girardeau Assessment Area was somewhat impacted by the pandemic. While some businesses have begun to open, additional safety protocols have resulted in a decline in sales. The hospitals, college, and abundance of small businesses have aided in counteracting the impact of the pandemic on unemployment rates in the area. Since the pandemic began, there has been some commercial growth in the area. The residential market has remained fairly stable. The pandemic has caused a rise in the costs associated with construction, which has hampered the development of new homes. High demand for homes coupled with the limitation on residential construction projects has resulted in a low supply of homes on the market. Management attributed this demand to the low long-term fixed rates available to borrowers.

Considering information from bank management, demographic data, and economic data, examiners determined that commercial and home mortgage loans represent the primary credit needs in the assessment area. Opportunities exist for originating such loans, as indicated by the percentages of small businesses and families in the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CAPE GIRARDEAU

LENDING TEST

Sterling Bank demonstrated reasonable performance under the Lending Test in the Cape Girardeau Assessment Area. The bank's cumulative Lending Test performance factors support this conclusion.

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the Cape Girardeau Assessment Area. The bank's small business lending performance, which carries the most weight, primarily supports this conclusion. Performance relative to small business lending was considered reasonable, while home mortgage lending was poor. Consideration was given to the dispersion of these loans in the assessment area's low- and moderate-income census tracts.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Sterling Bank's lending performance, based on number of loans, in the low-income geography exceeded aggregate data, while performance in moderate-income census tracts lags

aggregate data. Additional consideration was given to the high level of competition in the Cape Girardeau Assessment Area. The following table provides details.

Geographic Distribution of Small Business Loans Cape Girardeau Assessment Area						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	3.9	4.6	1	5.0	100	4.7
Moderate	10.1	11.2	1	5.0	113	5.3
Middle	65.5	65.2	13	65.0	1,252	58.4
Upper	20.4	19.0	5	25.0	677	31.6
Totals	**100.0**	**100.0**	**20**	**100.0**	**2,142**	**100.0**
Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*						

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor dispersion throughout the assessment area. Although the bank originated a limited number of home loans in 2019, the bank made seven loans in 2018, all to borrowers in middle- and upper-income tracts. This performance is consistent with the bank's performance in 2019, as illustrated in the table below.

Geographic Distribution of Home Mortgage Loans Cape Girardeau Assessment Area						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	2.1	0.7	0	0.0	0	0.0
Moderate	6.8	5.6	0	0.0	0	0.0
Middle	66.5	70.8	3	100.0	440	100.0
Upper	24.5	22.9	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**3**	**100.0**	**440**	**100.0**
Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. *Due to rounding, totals may not equal 100.0%*						

Borrower Profile

The distribution of borrowers reflects excellent penetration among businesses of different revenue sizes and individuals of different income levels in this assessment area, given the institution's business strategy. Examiners focused on the percentage, by number, of small business loans to businesses with GARs of $1 million or less and the percentage, by number, of home mortgage loans to low- and moderate-income borrowers.

Small Business Loans

Sterling Bank's distribution of borrowers reflects excellent penetration among businesses of different revenue sizes. The lending performance to businesses with gross annual revenues of $1 million or less, based on the number of loans, substantially exceeds aggregate lending data. The following table presents the distribution of small business loans originated inside the Cape Girardeau Assessment Area.

Distribution of Small Business Loans by Gross Annual Revenue Category

Cape Girardeau Assessment Area

Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	$(000s)	%
<=$1,000,000	76.9	45.7	15	75.0	1,111	51.9
>1,000,000	8.0	--	5	25.0	1,031	48.1
Revenue Not Available	15.1	--	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**20**	**100.0**	**2,142**	**100.0**

Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The distribution of home mortgage lending in the assessment area reflects excellent penetration to individuals of different income levels, including low- and moderate-income borrowers. Sterling Bank's lending performance to low- and moderate-income borrowers substantially exceeds aggregate performance. The following table reflects the distribution of home mortgage loans originated inside the Cape Girardeau Assessment Area.

Distribution of Home Mortgage Loans by Borrower Income Level

Cape Girardeau Assessment Area

Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	$(000s)	%
Low	20.2	7.1	1	33.3	149	34.0
Moderate	15.7	14.9	1	33.3	151	34.2
Middle	21.1	20.6	0	0.0	0	0.0
Upper	43.0	38.9	1	33.3	140	31.8
Not Available	0.0	18.5	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**3**	**100.0**	**440**	**100.0**

Source: 2015 ACS; Bank Data, 2018 & 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

COMMUNITY DEVELOPMENT TEST

Sterling Bank demonstrated excellent responsiveness to the community development needs of the Cape Girardeau Assessment Area through community development loans, qualified investments,

and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities in evaluating the bank's performance under this test.

Community Development Loans

Sterling Bank has made a high level of community development loans in the Cape Girardeau Assessment Area. Specifically, the bank originated or renewed 11 loans totaling $12,421,000 during the evaluation period that benefited this assessment area. The loans made served to provide affordable housing, revitalize and stabilize low- and moderate-income geographies, and promote economic development by creating or retaining jobs. This level of lending represents a significant increase since the previous evaluation in which the bank received consideration for 6 loans totaling $385,000.

Qualified Investments

During the evaluation period, a total of 22 qualified investments and donations were funded totaling $21,000 in the Cape Girardeau Assessment Area. The bank promoted community development through investments and donations that served to provide community services targeted to low- and moderate-income individuals, revitalize and stabilize low- and moderate-income geographies, and promote economic development. This level of qualified investments and donations represents a significant increase since the previous evaluation in which the bank received consideration for 4 activities totaling $3,000.

Community Development Services

The bank received consideration for a total of nine community development services that benefitted organizations within the assessment areas. The qualifying activities served to provide affordable housing and community services targeted to low- and moderate-income individuals. These community development services consisted of active participation by three bank employees with four different organizations performing services that meet the definition of community development under the CRA. This level of activity represents a slight increase in the number of qualified activities from the previous evaluation in which the bank received consideration for eight activities.

ILLINOIS – Full-Scope Review

CRA RATING FOR ILLINOIS: SATISFACTORY

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS

The rated area of Illinois consists of the St. Charles Assessment Area, the sole assessment area in the state. This assessment area consists of portions of Kane and DuPage Counties. Kane and DuPage counties are contiguous, with Kane County located in the eastern portion of the Elgin Illinois MSA and DuPage County located in the western portion of Chicago-Naperville-Evanston Illinois MSA. Since there is only one branch in the state, these two counties were reviewed as one assessment area. The St. Charles branch is located in a middle-income census tract.

Economic and Demographic Data

Based on 2015 ACS Census data, the assessment area consists of 49 census tracts, which is comprised of two moderate-, 17 middle-, and 30 upper-income census tracts. The following table illustrates select demographic characteristics of this assessment area based on 2015 ACS Census data and 2018 D&B data.

Demographic Information of the St. Charles Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	49	0.0	4.1	34.7	61.2	0.0
Population by Geography	261,069	0.0	3.0	32.4	64.6	0.0
Housing Units by Geography	91,814	0.0	2.5	32.7	64.8	0.0
Owner-Occupied Units by Geography	73,240	0.0	2.2	28.4	69.4	0.0
Occupied Rental Units by Geography	14,814	0.0	4.4	50.2	45.4	0.0
Vacant Units by Geography	3,760	0.0	2.0	46.4	51.6	0.0
Businesses by Geography	15,098	0.0	1.4	33.4	65.3	0.0
Farms by Geography	410	0.0	5.1	33.4	61.5	0.0
Family Distribution by Income Level	68,340	11.1	11.5	19.2	58.3	0.0
Household Distribution by Income Level	88,054	13.5	11.6	15.1	59.8	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		$75,350	Median Housing Value			$279,071
Median Family Income MSA - 20994 Elgin, IL MD		$79,687	Median Gross Rent			$1,176
			Families Below Poverty Level			3.9%

Source: 2015 ACS and 2018 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Service industries represent the largest portion of businesses in the assessment area at 37.3 percent; followed by non-classifiable establishments (19.8 percent); and retail trade (10.8 percent). In addition, 60.7 percent of area businesses have four or fewer employees and 90.7 percent operate from a single location.

Competition

Overall, there is a high level of competition for financial services in the St. Charles Assessment Area considering all relevant data. According to 2019 Reports of Condition data filed by financial institutions, there are 64 financial institutions that operate a total of 425 branches within the assessment area. Of these institutions, Sterling Bank ranked 51st in market share with less than one percent of the assessment area's deposits.

Review of 2018 CRA aggregate lending data illustrates the level of competition and demand for small business loans in the area. Specifically, 151 lenders reported 43,398 small business loans originated in the assessment area. Sterling Bank ranked 78th out of this group of lenders, with a market share of less than one percent. This level of activity represents a high level of competition considering the size of the area served.

Credit and Community Development Needs and Opportunities

Management has indicated that the economic conditions in the St. Charles Assessment Area continue to be strong despite the pandemic. The economic condition is supported by continued economic growth and strong commercial lending demand. Management also described the housing sector as strong. The area continues to have low vacancy rates coupled with the new multi-family and mixed-use commercial building construction sites. Management estimated an additional 670 residential units coming to the area through these efforts.

Considering information from bank management, demographic data, and economic data, examiners determined that commercial and home mortgage loans represent the primary credit needs in the assessment area. Opportunities exist for originating such loans, as indicated by the percentages of small businesses and families in the assessment area.

SCOPE OF EVALUATION – ILLINOIS

Performance in Illinois was based on a review of small business lending performance in the St. Charles Assessment Area. A review of home mortgage lending was not performed as there was no lending activity performed during the review period. In addition to the small business review, a review of community development loans, investments, and services in the assessment area was performed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ILLINOIS

LENDING TEST

Sterling Bank demonstrated satisfactory performance under the Lending Test in Illinois. The bank's cumulative Lending Test performance factors support this conclusion.

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The conclusion was supported by the bank's small business lending performance. Consideration was given to the dispersion of loans in the assessment area's two moderate-income census tracts since there are no low-income census tracts.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion. Although no small business loans were made to borrowers in the moderate-income census tracts, less than two percent of aggregate lending data occurred in these areas. Furthermore, the St. Charles Assessment Area is highly banked, and Sterling Bank's sole branch is not located near the two moderate-income census tracts in the assessment area. Therefore, when considering these factors, this level of activity is not unreasonable. The following table provides details for Sterling Bank's performance within the assessment area.

Geographic Distribution of Small Business Loans

St. Charles Assessment Area

Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	$(000s)	%
Moderate	1.4	1.3	0	0.0	0	0.0
Middle	33.4	34.1	2	33.3	225	25.5
Upper	65.3	64.6	4	66.7	656	74.5
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**6**	**100.0**	**881**	**100.0**

Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes, given the institution's business strategy. Examiners focused on the percentage, by number, of small business loans to businesses with GARs of $1 million.

Small Business Loans

The distribution of small business loans reflects a reasonable penetration among businesses of different revenue sizes in the assessment area. The lending performance to businesses with gross annual revenues of $1 million or less, based on the number of loans, exceeds aggregate lending data. The following table provides details for Sterling Bank's performance within the assessment area.

Distribution of Small Business Loans by Gross Annual Revenue Category St. Charles Assessment Area						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	82.1	42.4	3	50.0	106	12.0
>1,000,000	7.7	--	3	50.0	775	88.0
Revenue Not Available	10.2	--	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**6**	**100.0**	**881**	**100.0**
Source: 2018 D&B Data; Bank Data; 2018 CRA Aggregate Data; "--" data not available. *Due to rounding, totals may not equal 100.0%*						

COMMUNITY DEVELOPMENT TEST

Sterling Bank demonstrated adequate responsiveness to the community development needs of the St. Charles Assessment Area through community development loans and qualified investments. Examiners considered the institution's capacity and the need and availability of such opportunities in evaluating the bank's performance under this test.

Community Development Loans

Sterling Bank has made an adequate level of community development loans in the St. Charles Assessment Area. Specifically, the bank originated or renewed 15 loans totaling $1,825,000 during the evaluation period that benefited this assessment area. This level of lending represents an increase since the previous evaluation in which the bank received consideration for 2 loans totaling $144,000.

Qualified Investments

During the evaluation period, a total of 7 investments and donations were funded totaling $14,000 in the St. Charles Assessment Area. The bank promoted community development through investments and donations that served to provide community services targeted to low- and moderate-income individuals. This level of qualified investments and donations represents a significant increase since the previous evaluation in which the bank received consideration for 2 activities totaling $3,000.

Community Development Services

There were no qualified community development services provided in the St. Charles Assessment Area during this evaluation period. However, given a number of valid performance context factors, this level of performance is not unexpected. First, the assessment area is heavily banked and highly competitive. Additionally, Sterling Bank only operates one branch in the assessment area. Furthermore, the area has been described as affluent, making community development opportunities more difficult to obtain. Finally, there were no community development services provided in the St. Charles Assessment Area in the previous evaluation.

APPENDICES

INTERMEDIATE SMALL 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) by considering the following criteria:

1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
3) The geographic distribution of the bank's loans;
4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

1) The number and amount of community development loans;
2) The number and amount of qualified investments;
3) The extent to which the bank provides community development services; and
4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
Overall	Satisfactory	Outstanding	Satisfactory
Missouri	Satisfactory	Outstanding	Satisfactory
Illinois	Satisfactory	Satisfactory	Satisfactory

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.

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.

Cape Girardeau MO Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		Cape Girardeau County		
29	16020	31	8801.00	Middle
29	16020	31	8802.00	Middle
29	16020	31	8803.00	Middle
29	16020	31	8804.01	Middle
29	16020	31	8804.02	Middle
29	16020	31	8805.01	Upper
29	16020	31	8805.02	Middle
29	16020	31	8806.00	Upper
29	16020	31	8807.00	Middle
29	16020	31	8808.00	Middle
29	16020	31	8809.00	Moderate
29	16020	31	8810.00	Middle
29	16020	31	8811.00	Middle
29	16020	31	8812.00	Upper
29	16020	31	8813.01	Middle
29	16020	31	8813.02	Middle
29	16020	31	8814.00	Moderate
29	16020	31	8815.00	Upper
29	16020	31	8816.00	Moderate

State	MSA	County	Census Tract	Tract Income Level
		Scott County		
29	99999	201	7801.00	Middle
29	99999	201	7802.00	Middle
29	99999	201	7803.00	Middle
29	99999	201	7810.00	Middle
29	99999	201	7811.00	Middle

Southeast Missouri (SEMO) Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		Butler County		
29	99999	23	9501.01	Middle
29	99999	23	9501.02	Middle
29	99999	23	9502.01	Middle
29	99999	23	9502.02	Moderate
29	99999	23	9503.01	Upper
29	99999	23	9503.02	Upper
29	99999	23	9504.00	Moderate
29	99999	23	9505.00	Moderate
29	99999	23	9506.00	Middle
29	99999	23	9507.00	Low
29	99999	23	9508.00	Middle
29	99999	23	9509.00	Middle
		Carter County		
29	99999	35	9601.00	Middle
29	99999	35	9602.00	Middle
		Dunklin County		
29	99999	69	3601.00	Moderate
29	99999	69	3602.00	Middle
29	99999	69	3603.00	Moderate
29	99999	69	3604.00	Middle
		New Madrid County		
29	99999	143	9604.00	Middle
29	99999	143	9605.00	Moderate
29	99999	143	9606.00	Moderate

State	MSA	County	Census Tract	Tract Income Level
		Reynolds County		
29	99999	179	3802.00	Middle
		Ripley County		
29	99999	181	8701.00	Moderate
29	99999	181	8702.00	Moderate
29	99999	181	8703.00	Middle
29	99999	181	8704.00	Middle
		Shannon County		
29	99999	203	4702.00	Middle
		Stoddard County		
29	99999	207	4702.00	Middle
29	99999	207	4703.00	Middle
29	99999	207	4704.00	Middle
29	99999	207	4705.00	Moderate
29	99999	207	4706.00	Middle
29	99999	207	4707.00	Middle
29	99999	207	4708.00	Upper
		Wayne County		
29	99999	223	6901.00	Middle
29	99999	223	6902.00	Middle
29	99999	223	6903.00	Moderate
29	99999	223	6904.00	Moderate

St. Charles, IL Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		Dupage County		
17	16984	43	8413.07	Upper
17	16984	43	8413.08	Upper
17	16984	43	8413.10	Upper
17	16984	43	8413.12	Moderate
17	16984	43	8413.13	Middle
17	16984	43	8413.14	Upper
17	16984	43	8413.15	Middle
17	16984	43	8413.16	Upper
17	16984	43	8413.18	Middle
17	16984	43	8413.20	Middle
17	16984	43	8413.21	Upper
17	16984	43	8413.22	Middle
17	16984	43	8413.23	Middle
17	16984	43	8413.24	Upper
17	16984	43	8413.25	Upper
17	16984	43	8413.26	Upper
17	16984	43	8413.27	Upper
17	16984	43	8414.01	Middle
17	16984	43	8414.03	Upper
17	16984	43	8414.04	Upper
17	16984	43	8415.01	Moderate
17	16984	43	8415.03	Middle
17	16984	43	8415.04	Moderate
17	16984	43	8416.03	Middle
17	16984	43	8416.04	Middle
17	16984	43	8416.05	Middle
17	16984	43	8416.06	Upper
17	16984	43	8416.07	Middle

State	MSA	County	Census Tract	Tract Income Level
		Kane County		
17	20994	89	8520.01	Middle
17	20994	89	8520.02	Middle
17	20994	89	8520.04	Upper
17	20994	89	8520.05	Upper
17	20994	89	8521.01	Upper
17	20994	89	8521.03	Upper
17	20994	89	8521.04	Upper
17	20994	89	8522.01	Middle
17	20994	89	8522.03	Middle
17	20994	89	8522.04	Upper
17	20994	89	8523.00	Middle
17	20994	89	8524.04	Upper
17	20994	89	8524.05	Upper
17	20994	89	8524.06	Upper
17	20994	89	8524.07	Upper
17	20994	89	8524.08	Upper
17	20994	89	8525.00	Middle
17	20994	89	8526.06	Upper
17	20994	89	8526.07	Upper
17	20994	89	8526.08	Upper
17	20994	89	8527.00	Upper
17	20994	89	8528.03	Middle
17	20994	89	8528.05	Middle
17	20994	89	8528.06	Upper
17	20994	89	8528.07	Upper
17	20994	89	8528.08	Upper
17	20994	89	8545.05	Upper
17	20994	89	8545.06	Upper
17	20994	89	8545.07	Upper
17	20994	89	8548.00	Upper

St. Louis MO Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		St Louis County		
29	41180	189	2101.01	Moderate
29	41180	189	2101.02	Moderate
29	41180	189	2102.00	Moderate
29	41180	189	2103.00	Moderate
29	41180	189	2104.00	Moderate
29	41180	189	2105.01	Moderate
29	41180	189	2105.02	Moderate
29	41180	189	2106.00	Moderate
29	41180	189	2107.02	Moderate
29	41180	189	2107.03	Moderate
29	41180	189	2107.04	Moderate
29	41180	189	2108.03	Moderate
29	41180	189	2108.05	Middle
29	41180	189	2108.06	Middle
29	41180	189	2108.07	Middle
29	41180	189	2108.08	Middle
29	41180	189	2109.12	Middle
29	41180	189	2109.21	Middle
29	41180	189	2109.23	Middle
29	41180	189	2109.24	Middle
29	41180	189	2109.25	Middle
29	41180	189	2109.26	Moderate
29	41180	189	2109.27	Upper
29	41180	189	2109.28	Upper
29	41180	189	2110.01	Middle
29	41180	189	2110.02	Middle
29	41180	189	2111.01	Middle
29	41180	189	2111.02	Middle
29	41180	189	2112.01	Moderate
29	41180	189	2112.02	Middle
29	41180	189	2113.01	Middle
29	41180	189	2113.31	Middle
29	41180	189	2113.32	Middle
29	41180	189	2113.33	Middle
29	41180	189	2113.34	Middle
29	41180	189	2114.01	Moderate
29	41180	189	2114.02	Moderate
29	41180	189	2115.00	Low
29	41180	189	2116.00	Moderate
29	41180	189	2117.00	Moderate
29	41180	189	2118.01	Low
29	41180	189	2118.02	Moderate
29	41180	189	2119.00	Low
29	41180	189	2120.02	Low
29	41180	189	2120.03	Moderate
29	41180	189	2120.04	Low

State	MSA	County	Census Tract	Tract Income Level
		St Louis City		
29	41180	510	1011.00	Moderate
29	41180	510	1012.00	Middle
29	41180	510	1013.00	Middle
29	41180	510	1014.00	Moderate
29	41180	510	1015.00	Low
29	41180	510	1018.00	Moderate
29	41180	510	1021.00	Middle
29	41180	510	1022.00	Upper
29	41180	510	1023.00	Moderate
29	41180	510	1024.00	Middle
29	41180	510	1025.00	Moderate
29	41180	510	1031.00	Middle
29	41180	510	1034.00	Upper
29	41180	510	1036.00	Middle
29	41180	510	1037.00	Middle
29	41180	510	1038.00	Middle
29	41180	510	1042.00	Middle
29	41180	510	1045.00	Moderate
29	41180	510	1051.98	Upper
29	41180	510	1052.00	Middle
29	41180	510	1053.00	Unknown
29	41180	510	1054.00	Moderate
29	41180	510	1055.00	Middle
29	41180	510	1061.00	Low
29	41180	510	1062.00	Unknown
29	41180	510	1063.00	Moderate
29	41180	510	1064.00	Low
29	41180	510	1065.00	Moderate
29	41180	510	1066.00	Low
29	41180	510	1067.00	Moderate
29	41180	510	1072.00	Moderate
29	41180	510	1073.00	Low
29	41180	510	1074.00	Low
29	41180	510	1075.00	Moderate
29	41180	510	1076.00	Moderate
29	41180	510	1081.00	Low
29	41180	510	1082.00	Low
29	41180	510	1083.00	Moderate
29	41180	510	1096.00	Low
29	41180	510	1097.00	Low
29	41180	510	1101.00	Low
29	41180	510	1102.00	Low
29	41180	510	1103.00	Low
29	41180	510	1104.00	Moderate
29	41180	510	1105.00	Low
29	41180	510	1111.00	Moderate

29	41180	189	2121.01	Moderate
29	41180	189	2121.02	Low
29	41180	189	2122.01	Moderate
29	41180	189	2122.02	Low
29	41180	189	2123.00	Moderate
29	41180	189	2124.00	Moderate
29	41180	189	2125.00	Moderate
29	41180	189	2126.00	Moderate
29	41180	189	2127.01	Low
29	41180	189	2127.02	Low
29	41180	189	2131.02	Unknown
29	41180	189	2131.03	Middle
29	41180	189	2131.04	eLow
29	41180	189	2132.02	Middle
29	41180	189	2132.03	Middle
29	41180	189	2132.04	Middle
29	41180	189	2133.01	Moderate
29	41180	189	2133.02	Moderate
29	41180	189	2134.01	Moderate
29	41180	189	2134.02	Moderate
29	41180	189	2135.00	Moderate
29	41180	189	2136.00	Low
29	41180	189	2137.01	Unknown
29	41180	189	2137.02	Moderate
29	41180	189	2138.00	Low
29	41180	189	2139.00	Low
29	41180	189	2141.00	Low
29	41180	189	2142.00	Low
29	41180	189	2143.00	Low
29	41180	189	2144.00	Moderate
29	41180	189	2145.00	Middle
29	41180	189	2146.01	Moderate
29	41180	189	2146.02	Low
29	41180	189	2147.00	Moderate
29	41180	189	2148.00	Moderate
29	41180	189	2149.01	Moderate
29	41180	189	2149.02	Middle
29	41180	189	2150.01	Middle
29	41180	189	2150.03	Upper
29	41180	189	2150.04	Upper
29	41180	189	2150.05	Upper
29	41180	189	2151.02	Middle
29	41180	189	2151.03	Upper
29	41180	189	2151.05	Upper
29	41180	189	2151.41	Upper
29	41180	189	2151.43	Middle
29	41180	189	2151.44	Middle
29	41180	189	2151.45	Middle
29	41180	189	2151.46	Middle
29	41180	189	2152.01	Upper
29	41180	189	2152.31	Upper
29	41180	189	2152.33	Upper

29	41180	510	1112.00	Low
29	41180	510	1113.00	Low
29	41180	510	1121.00	Upper
29	41180	510	1122.00	Moderate
29	41180	510	1123.00	Low
29	41180	510	1124.00	Upper
29	41180	510	1135.00	Middle
29	41180	510	1141.01	Middle
29	41180	510	1141.02	Upper
29	41180	510	1142.00	Middle
29	41180	510	1143.00	Middle
29	41180	510	1151.00	Moderate
29	41180	510	1152.00	Low
29	41180	510	1153.00	Moderate
29	41180	510	1154.00	Moderate
29	41180	510	1155.00	LOw
29	41180	510	1156.00	Low
29	41180	510	1157.00	Moderate
29	41180	510	1161.00	Low
29	41180	510	1162.00	Upper
29	41180	510	1163.01	Middle
29	41180	510	1163.02	Low
29	41180	510	1164.00	Moderate
29	41180	510	1165.00	Middle
29	41180	510	1171.00	Middle
29	41180	510	1172.00	Upper
29	41180	510	1174.00	Upper
29	41180	510	1181.00	Middle
29	41180	510	1186.00	Middle
29	41180	510	1191.01	Unknown
29	41180	510	1191.02	Middle
29	41180	510	1192.00	Upper
29	41180	510	1193.00	Middle
29	41180	510	1202.00	Low
29	41180	510	1212.00	Lmod
29	41180	510	1231.00	Middle
29	41180	510	1232.00	Middle
29	41180	510	1233.00	Moderate
29	41180	510	1241.00	Moderate
29	41180	510	1242.00	Low
29	41180	510	1243.00	Upper
29	41180	510	1246.00	Low
29	41180	510	1255.00	Middle
29	41180	510	1256.00	Middle
29	41180	510	1257.00	Low
29	41180	510	1266.00	Low
29	41180	510	1267.00	Low
29	41180	510	1268.00	Middle
29	41180	510	1269.00	Moderate
29	41180	510	1270.00	Low
29	41180	510	1271.00	Low
29	41180	510	1272.00	Middle

29	41180	189	2152.34	Upper
29	41180	189	2152.35	Upper
29	41180	189	2152.36	Upper
29	41180	189	2153.01	Upper
29	41180	189	2153.02	Upper
29	41180	189	2154.00	Upper
29	41180	189	2155.00	Upper
29	41180	189	2156.00	Middle
29	41180	189	2157.00	Moderate
29	41180	189	2158.01	Upper
29	41180	189	2158.02	Moderate
29	41180	189	2158.03	Upper
29	41180	189	2159.01	Middle
29	41180	189	2159.02	Moderate
29	41180	189	2160.00	Moderate
29	41180	189	2161.01	Upper
29	41180	189	2161.02	Upper
29	41180	189	2162.01	Upper
29	41180	189	2162.02	Upper
29	41180	189	2163.00	Upper
29	41180	189	2164.01	Upper
29	41180	189	2164.02	Upper
29	41180	189	2165.00	Upper
29	41180	189	2166.00	Upper
29	41180	189	2167.00	Upper
29	41180	189	2168.00	Upper
29	41180	189	2169.00	Moderate
29	41180	189	2170.00	Middle
29	41180	189	2172.00	Middle
29	41180	189	2173.00	Middle
29	41180	189	2174.00	Upper
29	41180	189	2175.00	Upper
29	41180	189	2176.00	Upper
29	41180	189	2177.01	Upper
29	41180	189	2177.02	Upper
29	41180	189	2178.02	Upper
29	41180	189	2178.06	Middle
29	41180	189	2178.07	Upper
29	41180	189	2178.41	Upper
29	41180	189	2178.51	Upper
29	41180	189	2178.52	Upper
29	41180	189	2178.53	Upper
29	41180	189	2178.54	Upper
29	41180	189	2179.21	Upper
29	41180	189	2179.23	Upper
29	41180	189	2179.31	Upper
29	41180	189	2179.32	Upper
29	41180	189	2179.41	Middle
29	41180	189	2179.42	Upper
29	41180	189	2179.43	Upper
29	41180	189	2179.44	Upper
29	41180	189	2180.12	Upper

29	41180	510	1273.00	Middle
29	41180	510	1274.00	Low
29	41180	510	1275.00	Low
29	41180	510	1276.00	Middle
29	41180	510	1277.00	Low
29	41180	510	1278.00	Low

29	41180	189	2180.13	Upper
29	41180	189	2180.14	Upper
29	41180	189	2180.15	Middle
29	41180	189	2180.16	Middle
29	41180	189	2181.02	Middle
29	41180	189	2181.04	Moderate
29	41180	189	2181.05	Middle
29	41180	189	2182.01	Upper
29	41180	189	2183.00	Upper
29	41180	189	2184.01	Upper
29	41180	189	2184.02	Upper
29	41180	189	2185.00	Upper
29	41180	189	2186.00	Upper
29	41180	189	2188.00	Upper
29	41180	189	2189.01	Upper
29	41180	189	2189.02	Upper
29	41180	189	2191.00	Upper
29	41180	189	2192.00	Upper
29	41180	189	2193.00	Upper
29	41180	189	2194.00	Upper
29	41180	189	2195.01	Upper
29	41180	189	2195.02	Upper
29	41180	189	2196.01	Middle
29	41180	189	2196.02	Upper
29	41180	189	2197.00	Middle
29	41180	189	2198.01	Middle
29	41180	189	2198.02	Moderate
29	41180	189	2199.00	Middle
29	41180	189	2200.01	Middle
29	41180	189	2200.02	Middle
29	41180	189	2201.01	Moderate
29	41180	189	2201.02	Middle
29	41180	189	2202.00	Moderate
29	41180	189	2203.00	Low
29	41180	189	2204.41	Middle
29	41180	189	2204.42	Middle
29	41180	189	2204.43	Middle
29	41180	189	2204.45	Upper
29	41180	189	2204.46	Upper
29	41180	189	2204.47	Upper
29	41180	189	2204.48	Middle
29	41180	189	2204.49	Upper
29	41180	189	2204.50	Upper
29	41180	189	2204.51	Upper
29	41180	189	2204.52	Upper
29	41180	189	2205.01	Middle
29	41180	189	2205.03	Moderate
29	41180	189	2205.04	Moderate
29	41180	189	2206.01	Middle
29	41180	189	2206.02	Moderate
29	41180	189	2207.01	Middle
29	41180	189	2207.02	Middle

29	41180	189	2207.03	Middle
29	41180	189	2208.01	Upper
29	41180	189	2208.02	Middle
29	41180	189	2208.03	Upper
29	41180	189	2210.00	Moderate
29	41180	189	2211.00	Upper
29	41180	189	2212.01	Upper
29	41180	189	2212.02	Upper
29	41180	189	2213.32	Upper
29	41180	189	2213.35	Middle
29	41180	189	2213.36	Middle
29	41180	189	2213.37	Middle
29	41180	189	2213.38	Middle
29	41180	189	2213.39	Upper
29	41180	189	2214.21	Upper
29	41180	189	2214.23	Upper
29	41180	189	2214.24	Upper
29	41180	189	2214.25	Middle
29	41180	189	2214.26	Upper
29	41180	189	2215.02	Upper
29	41180	189	2215.03	Upper
29	41180	189	2215.06	Upper
29	41180	189	2216.21	Upper
29	41180	189	2216.24	Upper
29	41180	189	2216.25	Upper
29	41180	189	2216.26	Upper
29	41180	189	2216.27	Upper
29	41180	189	2216.29	Upper
29	41180	189	2216.30	Upper
29	41180	189	2216.31	Upper
29	41180	189	2218.00	Low
29	41180	189	2219.00	Middle
29	41180	189	2220.00	Upper
29	41180	189	2221.00	Upper

Kansas City MO Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		Jackson County		
29	28140	095	0003.00	Low
29	28140	095	0006.00	Moderate
29	28140	095	0007.00	Low
29	28140	095	0008.00	Moderate
29	28140	095	0009.00	Moderate
29	28140	095	0010.00	Low
29	28140	095	0011.00	Unknown
29	28140	095	0018.00	Low
29	28140	095	0019.00	Low
29	28140	095	0020.00	Moderate
29	28140	095	0021.00	Low
29	28140	095	0022.00	Low
29	28140	095	0023.00	Low
29	28140	095	0034.00	Moderate
29	28140	095	0037.00	Low
29	28140	095	0038.00	Moderate
29	28140	095	0043.00	Middle
29	28140	095	0044.00	Upper
29	28140	095	0046.00	Upper
29	28140	095	0051.00	Upper
29	28140	095	0052.00	Moderate
29	28140	095	0053.00	Middle
29	28140	095	0054.00	Low
29	28140	095	0055.00	Low
29	28140	095	0056.01	Low
29	28140	095	0056.02	Low
29	28140	095	0057.00	Unknown
29	28140	095	0058.01	Moderate
29	28140	095	0060.00	Low
29	28140	095	0061.00	Moderate
29	28140	095	0063.00	Low
29	28140	095	0065.00	Middle
29	28140	095	0066.00	Middle
29	28140	095	0067.00	Middle
29	28140	095	0069.00	Upper
29	28140	095	0071.00	Middle
29	28140	095	0072.00	Upper
29	28140	095	0073.01	Moderate
29	28140	095	0073.02	Unknown
29	28140	095	0074.00	Upper

29	28140	095	0075.00	Moderate
29	28140	095	0076.00	Moderate
29	28140	095	0077.00	Low
29	28140	095	0078.02	Moderate
29	28140	095	0079.00	Low
29	28140	095	0080.00	Moderate
29	28140	095	0081.00	Moderate
29	28140	095	0082.00	Middle
29	28140	095	0083.00	Upper
29	28140	095	0084.00	Upper
29	28140	095	0085.00	Upper
29	28140	095	0086.00	Upper
29	28140	095	0087.00	Moderate
29	28140	095	0088.00	Moderate
29	28140	095	0089.00	Moderate
29	28140	095	0090.00	Moderate
29	28140	095	0091.00	Middle
29	28140	095	0092.00	Middle
29	28140	095	0093.00	Middle
29	28140	095	0094.00	Middle
29	28140	095	0095.00	Low
29	28140	095	0096.00	Low
29	28140	095	0097.00	Low
29	28140	095	0098.00	Middle
29	28140	095	0099.00	Middle
29	28140	095	0102.01	Low
29	28140	095	0152.00	Upper
29	28140	095	0153.00	Moderate
29	28140	095	0154.01	Low
29	28140	095	0154.02	Unknown
29	28140	095	0157.01	Upper
29	28140	095	0157.02	Upper
29	28140	095	0158.00	Upper
29	28140	095	0159.00	Unknown
29	28140	095	0160.00	Low
29	28140	095	0161.00	Middle
29	28140	095	0162.00	Moderate
29	28140	095	0163.00	Low
29	28140	095	0164.00	Low
29	28140	095	0165.00	Low
29	28140	095	0166.00	Moderate
29	28140	095	0167.00	Moderate
29	28140	095	0168.01	Middle
29	28140	095	0168.02	Middle
29	28140	095	0169.00	Moderate
29	28140	095	0171.00	Moderate
29	28140	095	0172.00	Moderate

29	28140	095	0174.00	Low
29	28140	095	0175.00	Middle
29	28140	095	0178.00	Moderate
29	28140	095	9801.01	Unknown

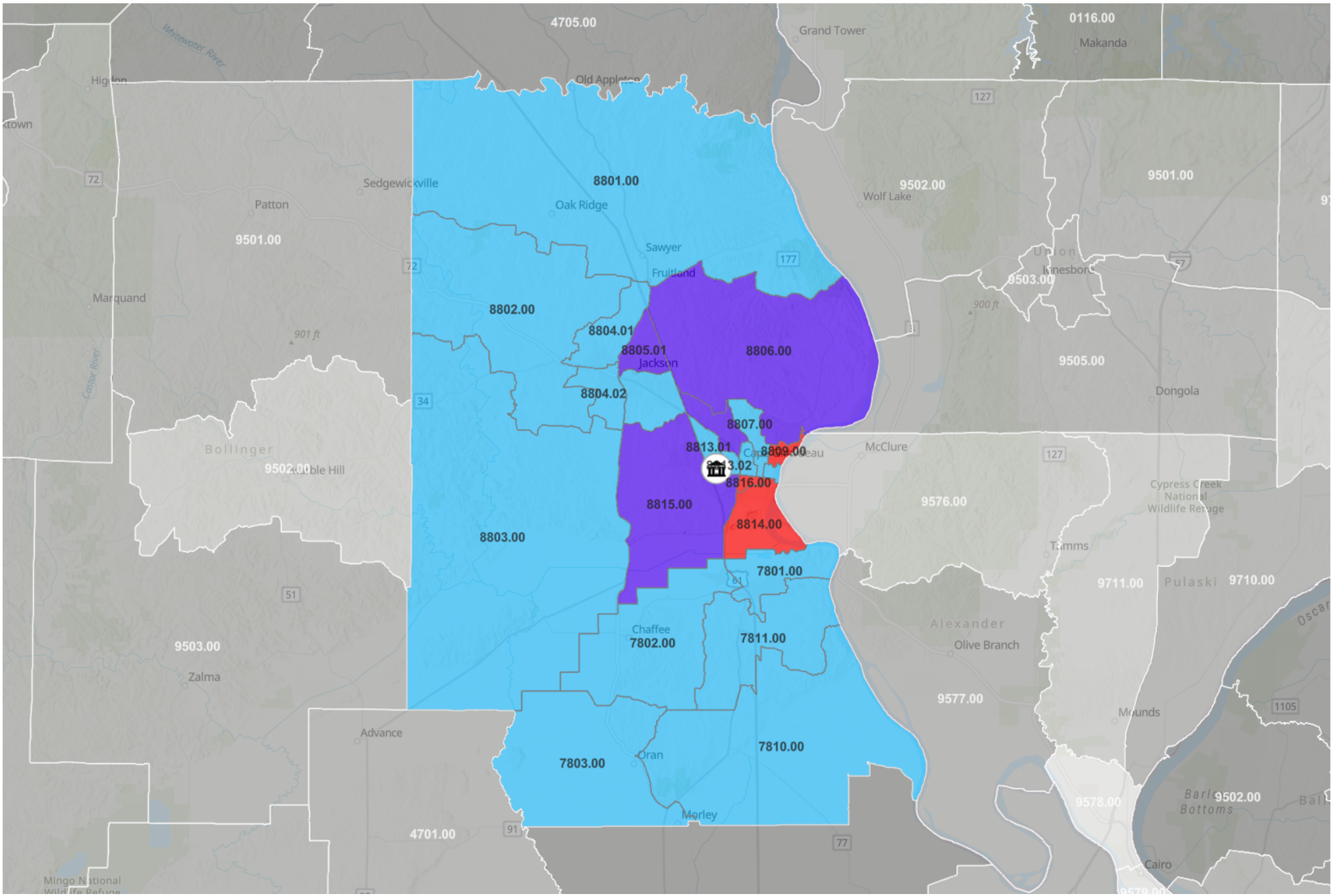
Fayetteville AR Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		Washington County		
05	22220	143	0101.01	Middle
05	22220	143	0101.07	Upper
05	22220	143	0101.08	Upper
05	22220	143	0101.09	Middle
05	22220	143	0101.10	Middle
05	22220	143	0101.11	Middle
05	22220	143	0101.12	Middle
05	22220	143	0101.13	Upper
05	22220	143	0101.14	Moderate
05	22220	143	0101.15	Upper
05	22220	143	0102.01	Moderate
05	22220	143	0102.02	Moderate
05	22220	143	0103.03	Middle
05	22220	143	0103.04	Low
05	22220	143	0103.05	Middle
05	22220	143	0103.06	Moderate
05	22220	143	0103.07	Low
05	22220	143	0104.01	Moderate
05	22220	143	0104.02	Moderate
05	22220	143	0104.04	Low
05	22220	143	0104.05	Middle
05	22220	143	0105.01	Middle
05	22220	143	0105.08	Middle
05	22220	143	0105.10	Middle
05	22220	143	0105.11	Middle
05	22220	143	0105.12	Moderate
05	22220	143	0105.13	Moderate
05	22220	143	0105.14	Middle
05	22220	143	0105.15	Upper
05	22220	143	0105.16	Middle
05	22220	143	0105.17	Middle
05	22220	143	0105.18	Upper
05	22220	143	0105.19	Middle
05	22220	143	0105.20	Middle
05	22220	143	0105.21	Middle
05	22220	143	0106.01	Moderate
05	22220	143	0106.02	Low
05	22220	143	0107.03	Low
05	22220	143	0107.04	Low
05	22220	143	0107.05	Moderate
05	22220	143	0107.06	Upper
05	22220	143	0110.02	Moderate
05	22220	143	0110.03	Middle
05	22220	143	0110.04	Moderate
05	22220	143	0110.05	Middle
05	22220	143	0110.06	Middle
05	22220	143	0111.03	Middle
05	22220	143	0111.04	]mo
05	22220	143	0111.05	Moderate
05	22220	143	0111.06	Middle
05	22220	143	0111.07	Middle
05	22220	143	0112.00	Moderate
05	22220	143	0113.01	Low
05	22220	143	0113.20	Unknown

Rogers AR Assessment Area

State	MSA	County	Census Tract	Tract Income Level
		Benton County		
05	22220	007	0201.02	Upper
05	22220	007	0201.03	Middle
05	22220	007	0201.04	Middle
05	22220	007	0202.01	Middle
05	22220	007	0202.03	Middle
05	22220	007	0202.05	Moderate
05	22220	007	0202.06	Moderate
05	22220	007	0203.01	Moderate
05	22220	007	0203.02	Middle
05	22220	007	0203.04	Middle
05	22220	007	0203.05	Middle
05	22220	007	0204.01	Middle
05	22220	007	0204.02	Middle
05	22220	007	0204.04	Middle
05	22220	007	0204.05	Upper
05	22220	007	0205.01	Upper
05	22220	007	0205.03	Middle
05	22220	007	0205.04	Moderate
05	22220	007	0206.04	Upper
05	22220	007	0206.05	Upper
05	22220	007	0206.06	Upper
05	22220	007	0206.07	Upper
05	22220	007	0206.08	Upper
05	22220	007	0207.01	Upper
05	22220	007	0207.03	Upper
05	22220	007	0207.04	Middle
05	22220	007	0208.01	Upper
05	22220	007	0208.03	Middle
05	22220	007	0208.05	Middle
05	22220	007	0208.06	Upper
05	22220	007	0209.03	Middle
05	22220	007	0209.04	Upper
05	22220	007	0209.05	Middle
05	22220	007	0209.06	Upper
05	22220	007	0210.01	Moderate
05	22220	007	0210.03	Middle
05	22220	007	0210.04	Middle
05	22220	007	0211.01	Moderate
05	22220	007	0211.02	Middle
05	22220	007	0212.01	Middle
05	22220	007	0212.02	Moderate
05	22220	007	0213.04	Upper
05	22220	007	0213.05	Middle
05	22220	007	0213.06	Upper
05	22220	007	0213.08	Upper
05	22220	007	0213.12	Moderate
05	22220	007	0213.13	Middle
05	22220	007	0213.14	Middle
05	22220	007	0213.15	Upper
05	22220	007	0213.16	Upper
05	22220	007	0213.17	Upper
05	22220	007	0214.04	Middle
05	22220	007	0214.05	Middle
05	22220	007	0214.06	Middle
05	22220	007	0214.07	Upper
05	22220	007	0214.08	Moderate
05	22220	007	0214.09	Middle

Cape Girardeau Assessment Area



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Tract Income Level

- Inside - Low
- Inside - Moderate
- Inside - Middle
- Inside - Upper
- Inside - Unclassified
- Outside - Low
- Outside - Moderate
- Outside - Middle
- Outside - Upper
- Outside - Unclassified

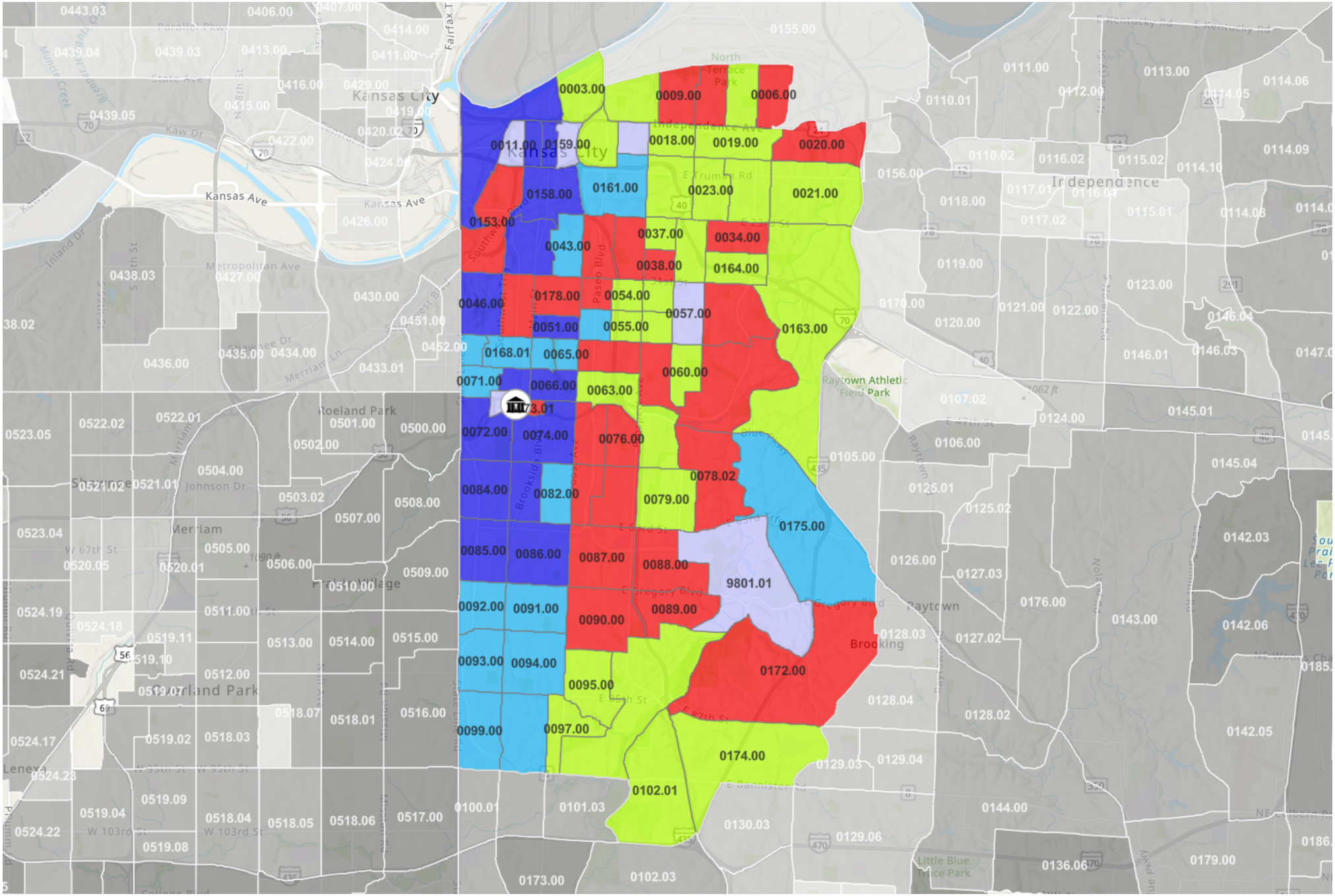
Branches



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Kansas City Assessment Area



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Tract Income Level

- Inside - Low
- Inside - Moderate
- Inside - Middle
- Inside - Upper
- Inside - Unclassified
- Outside - Low
- Outside - Moderate
- Outside - Middle
- Outside - Upper
- Outside - Unclassified

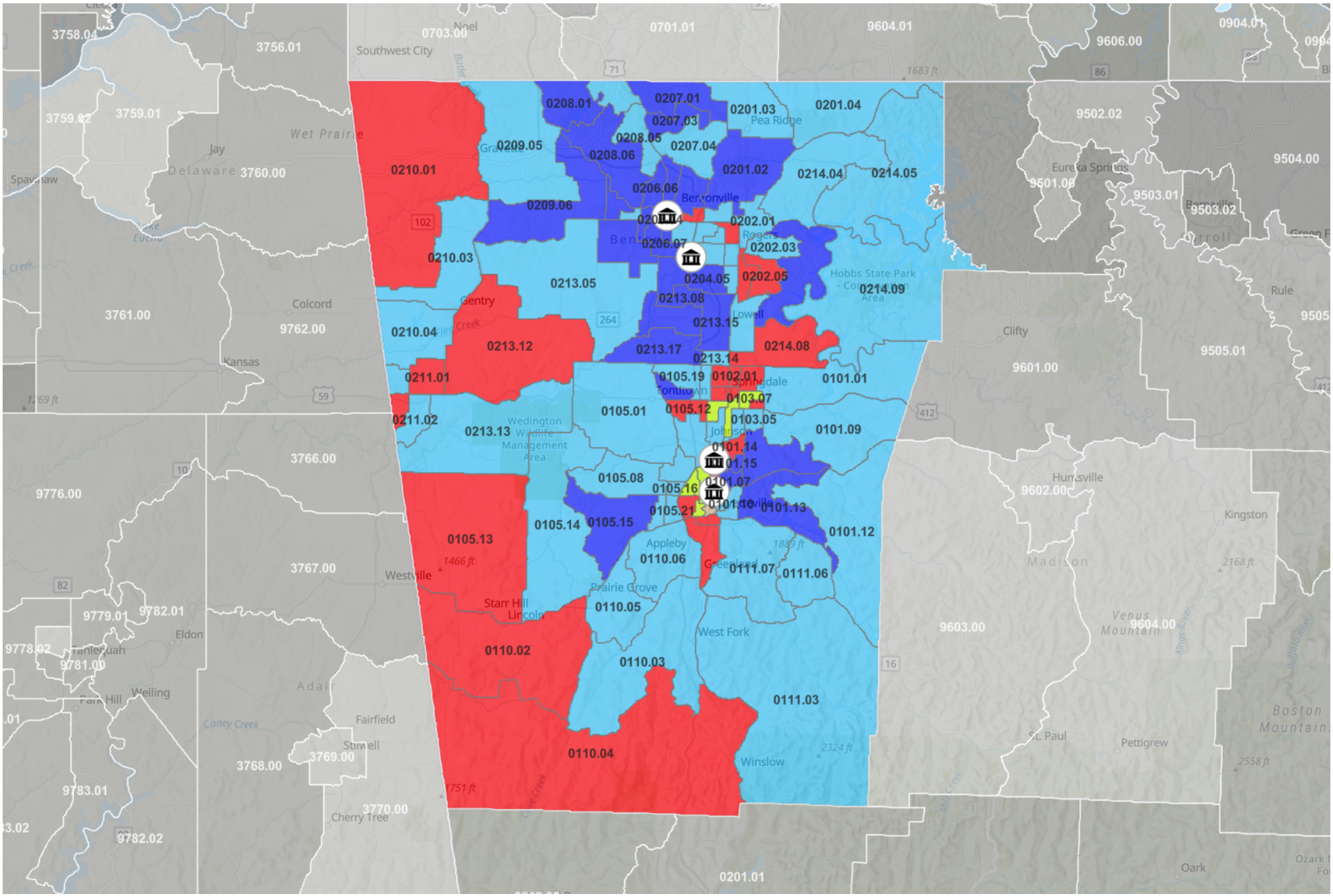
Branches



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Northwest AR Assessment Area



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Tract Income Level

- Inside - Low
- Inside - Moderate
- Inside - Middle
- Inside - Upper
- Inside - Unclassified
- Outside - Low
- Outside - Moderate
- Outside - Middle
- Outside - Upper
- Outside - Unclassified

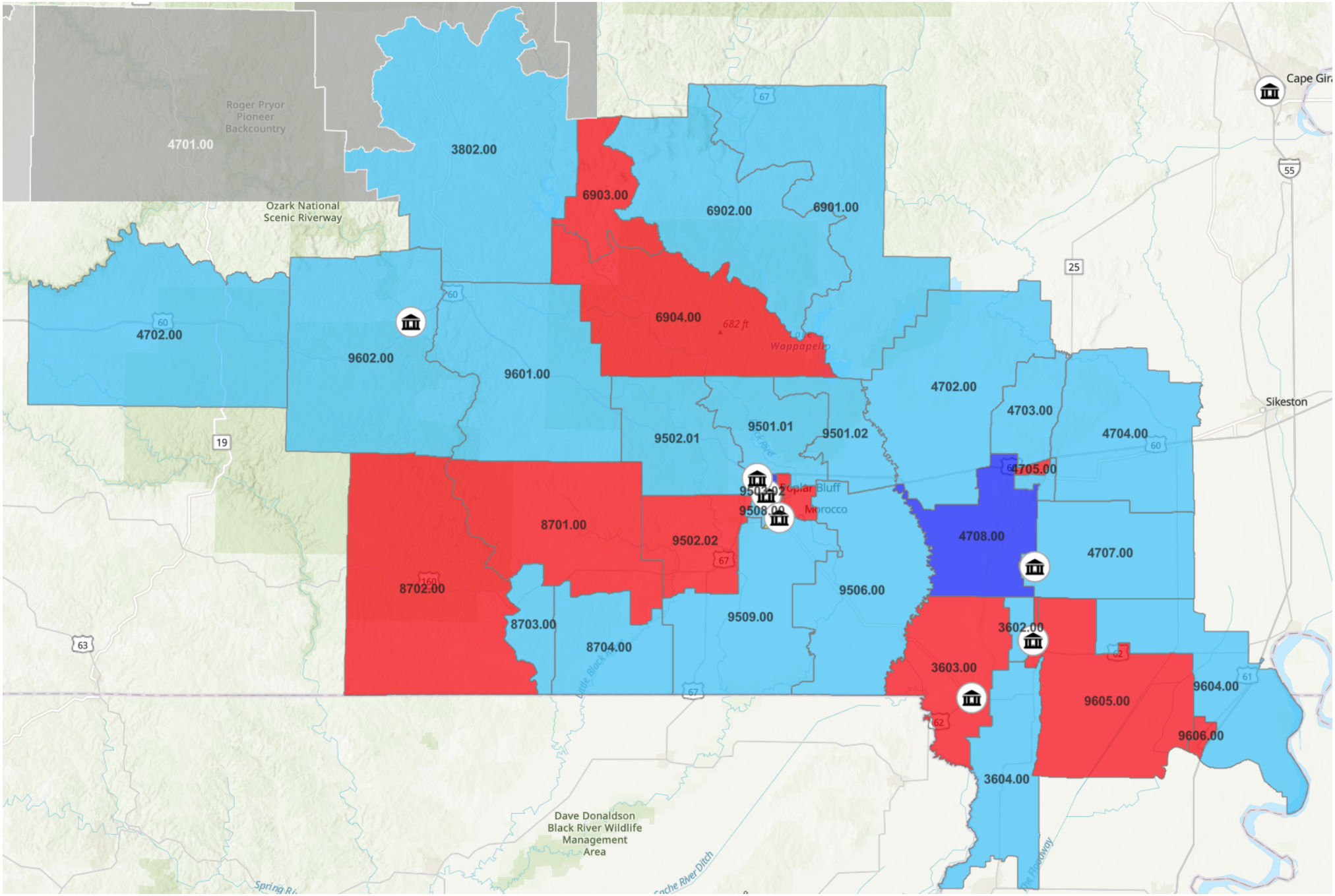
Branches



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Southeast Missouri Assessment Area



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Tract Income Level

- Inside - Low
- Inside - Moderate
- Inside - Middle
- Inside - Upper
- Inside - Unclassified
- Outside - Low
- Outside - Moderate
- Outside - Middle
- Outside - Upper
- Outside - Unclassified

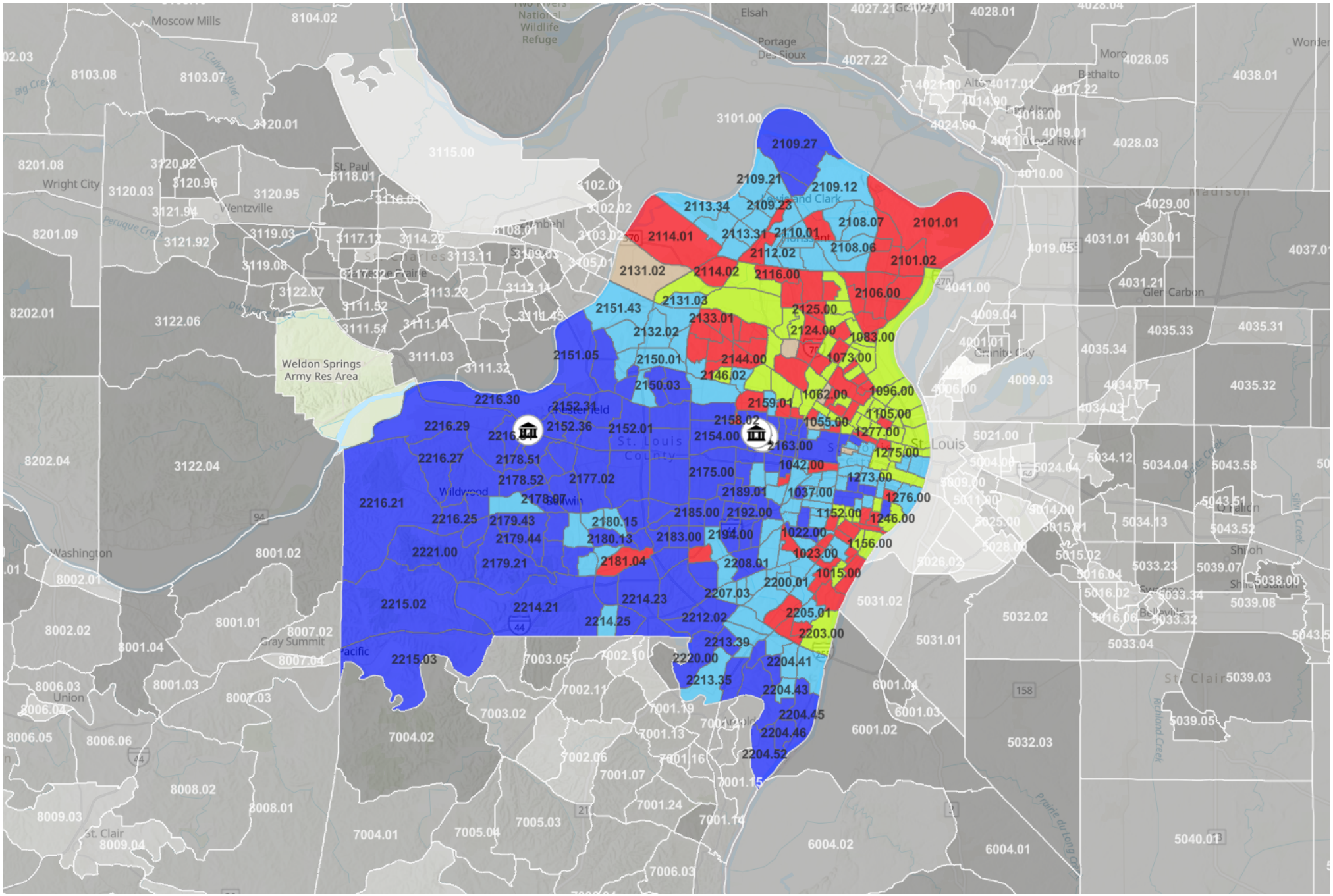
Branches



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St Louis Assessment Area



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Tract Income Level

- Inside - Low
- Inside - Moderate
- Inside - Middle
- Inside - Upper
- Inside - Unclassified
- Outside - Low
- Outside - Moderate
- Outside - Middle
- Outside - Upper
- Outside - Unclassified

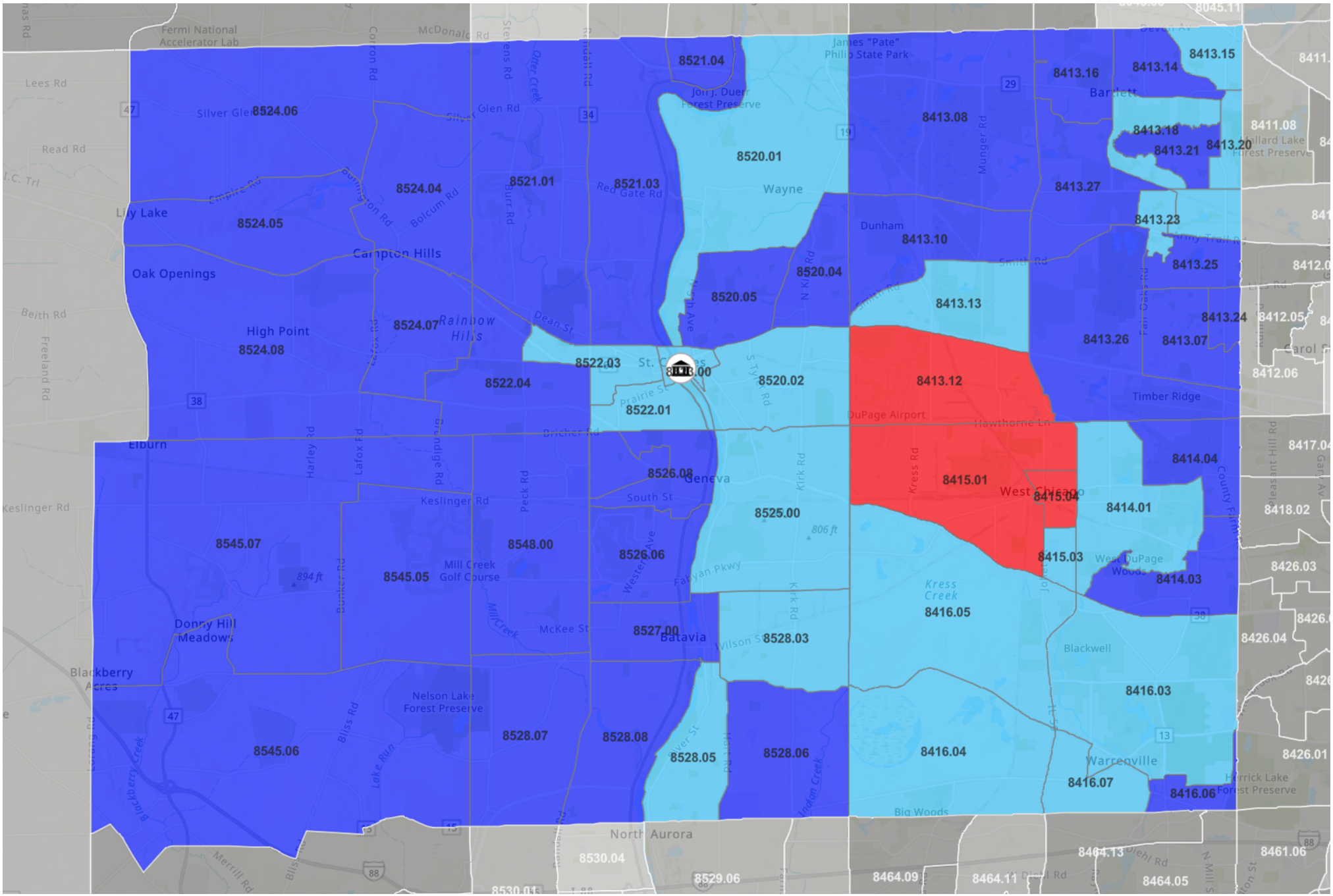
Branches



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St. Charles IL Assessment Area



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Date: 03/01/2024 5:24:24pm By Kurt Miller

Tract Income Level

- Inside - Low
- Inside - Moderate
- Inside - Middle
- Inside - Upper
- Inside - Unclassified
- Outside - Low
- Outside - Moderate
- Outside - Middle
- Outside - Upper
- Outside - Unclassified

Branches



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Community Reinvestment Act Public Information

Sterling Bank is a bank with assets of over $1.372 billion having eleven banking locations in Missouri, one in Illinois and two in Arkansas. The following is each facility's respective street address and census tracts.

Full Service Facilities

Missouri

Bernie Branch
240 North Walnut St
Bernie, MO 63822
Census Tract 4707.00

Campbell Branch
110 West Grand Ave
Campbell, MO 63933
Census Tract 3603.00

Cape Girardeau Branch
17 South Mount Auburn Road
Cape Girardeau, MO 63703
Census Tract: 8813.01
MSA/MD Code: 16020

Chesterfield Branch
16100 Swingley Ridge Road
Chesterfield, MO 63017
Census Tract: 2216.30
MSA/MD Code: 41180

Clayton Branch
8182 Maryland Ave, Suite 100
St. Louis, MO 63105
Census Tract: 2164.01
MSA/MD Code: 41180
Opened: 08/14/2023

Kansas City Branch
300 Ward Parkway
Kansas City, MO 64112
Census Tract: 0073.02
MSA/MD Code: 28140
Opened: 8/3/2020

Malden Branch
1103 North Douglass St
Malden, MO 63863
Census Tract: 3602.00

Poplar Bluff North Branch
2911 North Westwood Blvd
Poplar Bluff, MO 63901
Census Tract: 9503.01

Poplar Bluff South Branch
2340 South Broadway
Poplar Bluff, MO 63901
Census Tract: 9507.00

Poplar Bluff Midtown Branch
1100 Sterling Drive
Poplar Bluff, MO 63901
Census Tract: 9503.02

Van Buren Branch
407 Ash
Van Buren, MO 63965
Census Tract: 9602.00

Illinois

St. Charles Branch
10 Illinois St
St. Charles, IL 60174
Census Tract: 8523.00
MSA/MD Code: 20994
Opened: October 1, 2018

Arkansas
Fayetteville
3453 N Steele Blvd
Fayetteville, AR 72703
Census Tract: 0105.11
MSA/MD Code: 22220
Opened 2/22/2022

Rogers
1101 South 52nd St
Rogers, AR 72758
Census Tract: 0204.01
MSA/MD Code: 22220
Opened 03/23/2023

Closed Branches

Fayetteville
1607 N College Ave, Suite A
Fayetteville, AR 72703
Census Tract: 0107.06
MSA/MD Code: 22220
Opened: 6/1/2020
Closed: 2/19/2022

Clayton Branch
50 S. Bemiston Ave
St. Louis, MO 63105
Census Tract: 2164.01
MSA/MD Code: 41180
Closed: 08/11/2023

Automated Teller Machines:

Missouri

Bernie Branch
240 North Walnut St
Bernie, MO 63822
Census Tract 4707.00

Campbell Branch
110 West Grand Ave
Campbell, MO 63933
Census Tract 3603.00

Cape Girardeau Branch
17 South Mount Auburn Road
Cape Girardeau, MO 63703
Census Tract: 8813.01
MSA/MD Code: 16020

Chesterfield Branch
16100 Swingley Ridge Road
Chesterfield, MO 63017
Census Tract: 2216.30
MSA/MD Code: 41180

Clayton Branch
8182 Maryland Ave, Suite 100
St. Louis, MO 63105
Census Tract: 2164.01
MSA/MD Code: 41180
Opened: 08/14/2023

Kansas City Branch
300 Ward Parkway
Kansas City, MO 64112
Census Tract: 0073.02
MSA/MD Code: 28140
Opened: 08/03/2020

Malden Branch
1103 North Douglass St
Malden, MO 63863
Census Tract: 3602.00

Poplar Bluff North Branch
2911 North Westwood Blvd
Poplar Bluff, MO 63901
Census Tract: 9503.01

Poplar Bluff South Branch
2340 South Broadway
Poplar Bluff, MO 63901
Census Tract: 9507.00

Poplar Bluff Midtown Branch
1100 Sterling Drive
Poplar Bluff, MO 63901
Census Tract: 9503.02

Van Buren Branch
407 Ash
Van Buren, MO 63965
Census Tract: 9602.00

Illinois

St. Charles Branch
10 Illinois St
St. Charles, IL 60174
Census Tract: 8523.00
MSA/MD Code: 20994
Opened: October 1, 2018

Arkansas

Fayetteville Branch
3453 N Steele Blvd
Fayetteville, AR 72703
Census Tract: 0105.11
MSA/MD Code: 22220
Opened: February 22, 2022

Rogers Branch
1101 South 52nd St
Rogers, AR 72758
Census Tract: 0204.01
MSA/MD Code: 22220
Opened 03/23/2023

Closed ATM

Clayton Branch
50 S. Bemiston Ave
St. Louis, MO 63105
Census Tract: 2164.01
MSA/MD Code: 41180
Closed: 08/11/2023

Hours of Operation

Facility	Lobby Hours	Teller Drive-Up Hours
1100 Sterling Drive	9:00-3:00 Mon-Thurs	8:00-4:30 Mon-Thurs
2911 N Westwood Blvd	9:00-5:00 Fri	8:00-5:00 Fri
2340 S Broadway	Closed Sat & Sun	Closed Sat & Sun
Poplar Bluff, MO 63901		
240 N Walnut	9:00-3:00 Mon-Thurs	8:00-4:30 Mon-Thurs
	9:00-5:00 Fri	8:00-5:00 Fri
Bernie, MO 63822	Closed Sat & Sun	Closed Sat & Sun
110 W Grand	9:00-3:00 Mon-Thurs	8:00-4:30 Mon-Thurs
	9:00-5:00 Fri	8:00-5:00 Fri
Campbell, MO 63933	Closed Sat & Sun	Closed Sat & Sun
17 S Mount Auburn Rd	9:00-3:00 Mon-Thurs	8:00-4:30 Mon-Thurs
	9:00-5:00 Fri	8:00-5:00 Fri
Cape Girardeau, MO 63703	Closed Sat & Sun	Closed Sat & Sun
16100 Swingley Ridge Road	9:00-5:00 Mon-Fri	9:00-5:00 Mon-Fri
Chesterfield, MO 63017	Closed Sat & Sun	Closed Sat & Sun
8182 Maryland Ave Suite 100	9:00-5:00 Mon-Fri	NA
St Louis, MO 63105	Closed Sat & Sun	NA
300 Ward Parkway	9:00-5:00 Mon-Fri	NA
Kansas City, MO 64112	Closed Sat & Sun	NA
1103 N Douglas	9:00-3:00 Mon-Thurs	8:00-4:30 Mon-Thurs
	9:00-5:00 Fri	8:00-5:00 Fri
Malden, MO 63863	Closed Sat & Sun	Closed Sat & Sun
702 Main Street	8:30-4:00 Mon-Thurs	8:30 – 4:00 Mon - Thurs
	8:30 – 5:00 Fri	
Van Buren, MO 63965	Closed Sat & Sun	
10 Illinois St	9:00-5:00 Mon-Fri	NA
St. Charles, IL 60174	Closed Sat & Sun	NA
3453 N Steele Blvd	9:00-4:00 Mon-Thurs	8:30-4:30 Mon-Thurs

Fayetteville, AR 72703	9:00-5:00 Fri Closed Sat & Sun	8:30-5:00 Fri Closed Sat & Sun
1101 South 52nd St	9:00-4:00 Mon-Thurs	8:30-4:30 Mon-Thurs
Rogers, AR 72758	9:00-5:00 Fri Closed Sat & Sun	8:30-5:00 Fri Closed Sat & Sun

Loan to Deposit Ratios:

Loan to Deposit Ratios for the previous calendar year were as follows:

03/31/2023	82.38%
06/30/2023	82.45%
09/30/2023	82.77%
12/31/2023	82.08%

Home Mortgage Disclosure Act Notice

STERLING BANK
Member FDIC

The HMDA data about our residential mortgage lending are available for your review. The data shows geographic distribution of loans and application; ethnicity, race, sex, and income of applicants and borrowers; and information about loan approvals and denials.

These data are available online at the Consumer Financial Projection Bureau's website (www.consumerfinance.gov/hmda). HMDA data for may other financial institutions are also available at this website.

KURT MILLER
STERLING BANK
2911 NORTH WESTWOOD BLVD
POPLAR BLUFF, MO 63901

STERLING BANK

Lending and Deposit Products and Services

Lending Products

Personal Loan
Auto Loan
Boat Loan
Home Mortgage
Residential Real Estate
Personal Construction Loan
Adjustable Rate Mortgage
Home Equity Line of Credit
Commercial Loan
Commercial Construction Loan
Commercial Real Estate
Agricultural Loan
Working Capital Loan
Letters of Credit
Affordable Housing
Low Income Housing Tax Credit
Credit Builder CD Loan
Home Refresh
Home Advantage
Federal Home Loan Bank Home$tart Grant

Deposit Products

Checking Accounts
Platinum Interest Checking
Fabulous 50 Interest Checking
Convenient Interest Checking
Completely Free Checking
NOW Account
Completely Free Business Checking

Savings Accounts
Maximum Savings
Christmas Club

Rev 04/2024

Money Market Accounts
Sterling Money Market
Sterling Silver Money Market

Certificate of Deposit
Time CD (3 - 60 month terms)
6 Month Add-On CD

Individual Retirement Accounts
Savings IRA
Certificate IRA

Health Savings Accounts
Individual
Family

Other Products and Services

Safe Deposit Box
Not available at all locations

24 Hour ATM

Night Depository
Not available at all locations

VISA Debit Cards
Choose your own PIN
Receive your card the same day or by mail
Contactless

Sterling uChoose Rewards
Debit card reward program

Sterling Rewards
Rewarding you for banking with us.

ATM Anytime, Anywhere
Use your Sterling Bank debit card at any ATM and we will reimburse your ATM fees

Merchant Services
Merchant credit card processing services available

Visa Credit Cards
Consumer and Commercial

IntraFi
Certificate of Deposit Account Registry Service (CDARS)
Insured Cash Sweep (ICS)
Wire Transfer Services (Domestic and International)

eBanking

Sterling Retail Online
Personal online banking
Bill Pay

Sterling Business Online
Business online banking
Business Bill Pay
ACH Origination (subject to approval)
BizLink Remote Deposit Capture Service (with approval)
Positive Pay

Mobile Wallet
Apple Pay
Google Pay
Samsung Pay

Notifi
Online banking notification alerts

Mobile Banking App

Mobile Deposit

E-Statements

E-Notices

CardHub
Card Management

Credit Sense Credit Score

Schedule of Fees

Effective May 1, 2023

Sterling Bank

Member FDIC

ACCOUNT FEES & SERVICES	RATE
Account or Statement Research	$25.00 per hour
Account Balancing Assistance	$25.00 per hour
Check Collection Fee	$25.00 per item *(plus cost of paying agent)*
Locking Bank Bag	$25.00
Overdraft Fees*	$25.00
Overdraft Fee Daily Maximum	$150.00
Return NSF Fee	$25.00
Return NSF Fee Daily Maximum	$150.00
Returned Deposited Item Fee	$5.00
Stop Payment	$25.00
Incoming/Outgoing Domestic Wire Transfers	$20.00
Incoming/Outgoing International Wire Transfers	$100.00

Effective date: 05/01/2023

Clarification of Fees:

* Overdraft Fee–Applies to items paid, which create an overdraft of $5.00 or more, created by check, in-person withdrawal, ATM withdrawal, or other electronic means, as applicable. Applies to consumer and commercial checking accounts.

- Overdraft Fee Daily Maximum applies to consumer and commercial checking accounts. A total of 6 items per day not to exceed $150.00.
- Return NSF Fee Daily Maximum applies to consumer and commercial checking accounts. A total of 6 items per day not to exceed $150.00.
- NSF = Nonsufficient Funds