



Community Reinvestment Act Public File

Branch Information

Wellington (Main)

Location:

206 E. Harvey

Wellington, KS 67152

Census Tract 9625.00

Phone: 620-326-3361

Hours: Lobby

Monday – Thursday

9:30am – 3:30pm

Friday

9:30am – 5:00pm

Drive Up

Monday – Friday

7:30am – 5:30pm

Saturday

8:00am – 11:00am

ATM located in drive-thru area.

Caldwell

Location:

24 N. Main

Caldwell, KS 67022

Census Tract 9623.00

Phone: 620-845-6444

Hours:

Lobby

Monday – Thursday

9:00am – 3:30pm

Friday

9:00am – 5:00pm

Drive Up

Monday – Thursday

8:00am – 4:30pm

Friday

8:00am – 5:00pm

ATM located in the entrance of the bank.

ATM locations

1111 W. 8th Street (Dillons)

1021 W. 8th Street (Casey's)

1400 E. 16th Street (Casey's)

1700 E. 16th Street (WHS commons)

315 W. Main Street, Oxford, KS (Casey's)

400 N. Logan Street, Belle Plaine, KS (Casey's)

201 N. 5th St, Conway Springs, KS (Casey's)

Opened and Closed Branches

No branches have been opened or closed during the current year and prior two years.

List of Products, Services, and Fees

Deposit Accounts

Checking

- Premier Checking
- Impact Checking
- Employee Checking
- Free Checking
- Non-Profit NOW
- Non-Profit Checking
- Public Funds NOW
- Public Funds Checking
- Business NOW
- Business Checking

Savings

- Personal Savings
- Johnny Appleseed Savings
- Christmas Club
- Public Funds Savings
- Non-Profit Savings
- Business Savings

Time Deposits

- Certificate of Deposits (30-90 days, 91-180 days, 181-270 days, 271-364 days, 12 months, 13-17 months, 18-23 months, 24-35 months, 37-47 months, 48-59 months, 60 months)
- Individual Retirement Account (12 months, 13-23 months, 24-35 months, 36-47 months, 48-59 months, 60-96 months)
- Public Fund CD (30-90 days, 91-180 days, 181-270 days, 271-364 days, 12 months, 13-17 months, 18-23 months, 24-35 months, 36-47 months, 48-59 months, 60 months)

List of Products, Services, and Fees

Loans

Commercial/Business

- Working capital loans
- Equipment loans
- Inventory loans
- Real estate loans
- Real estate construction loans
- Small business loans
- Carry accounts receivable
- Issue Letters of Credit
- Seasonal inventory loans
- Operating expenses connected with growing crops, livestock and implement purchases
- Farmers Home Loan Association programs

Real Estate Loans

- Fixed rate conventional loans for purchase or refinance
- Three- and Five-year balloon loans
- Home Improvement loans
- Land Purchases
- Second mortgages
- Construction loans
- Real Estate loans offered through secondary market (Lakeview/Bayview Loan Servicing)

Consumer

- Automobile
- Appliances
- Home improvements
- Debt consolidation
- Vacations
- Personal loans (secured and unsecured)
- Boats
- Motorcycle
- Recreational vehicles
- Mobile home

Cash, Stocks and Bonds

- Certificate of Deposit
- Listed stocks
- Municipal, federal and government bonds

SBA Loans

List of Products, Services, and Fees

Other Services

- **Internet Banking**
- **Mobile Deposit**
- **Bill Pay**
- **Overdraft Protection**
- **Wire Transfer Service**
- **Notary Services**
- **Visa and Mastercard for Merchants**
- **24-hour phone banking**
- **Proof coin sets from the Treasury Dept.**
- **Night depository**
- **Bank by mail services**
- **Incoming and outgoing fax service**
- **Mastercard debit card**
- **Direct or electronic deposit services**
- **Cashier checks**
- **Bank money orders**
- **Account reconciliation services**
- **Mobile banking**

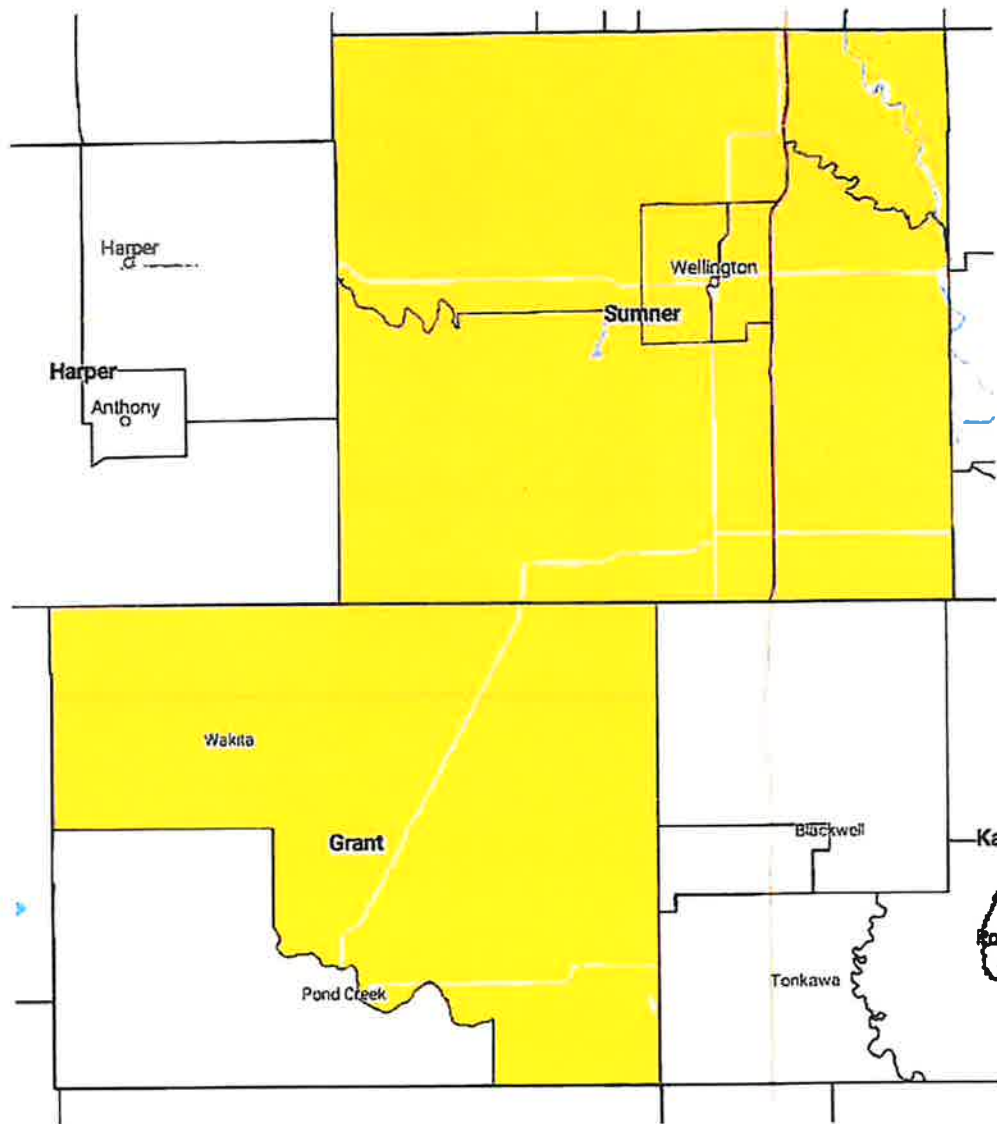
Written Comments

Impact Bank has not received any written comments from the public that specifically relate to the Bank's CRA performance during the current year or prior two calendar years.

Assessment Area

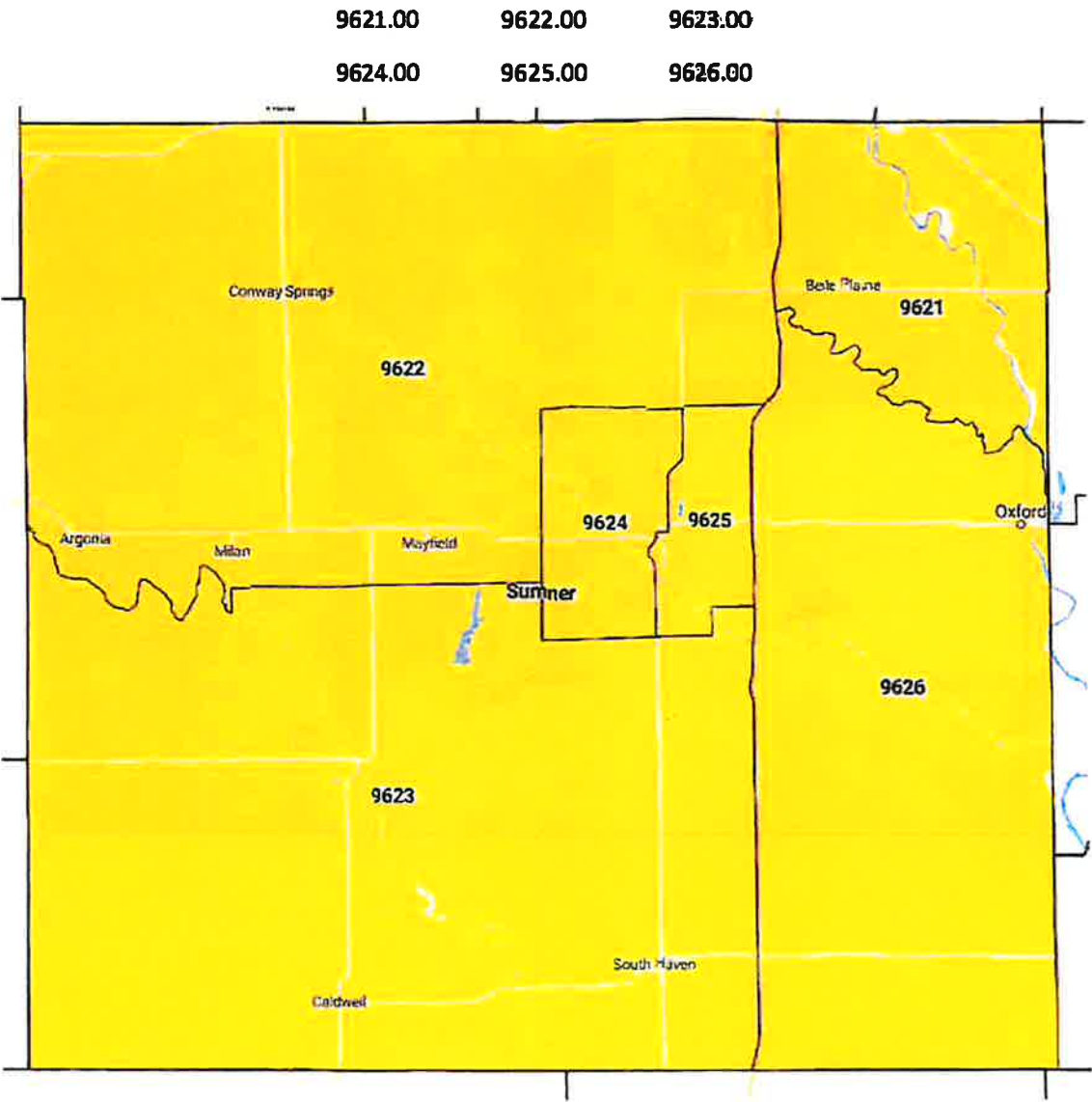
Sumner County, KS – All Census Tracts

Grant County, OK – Census Tract 9565



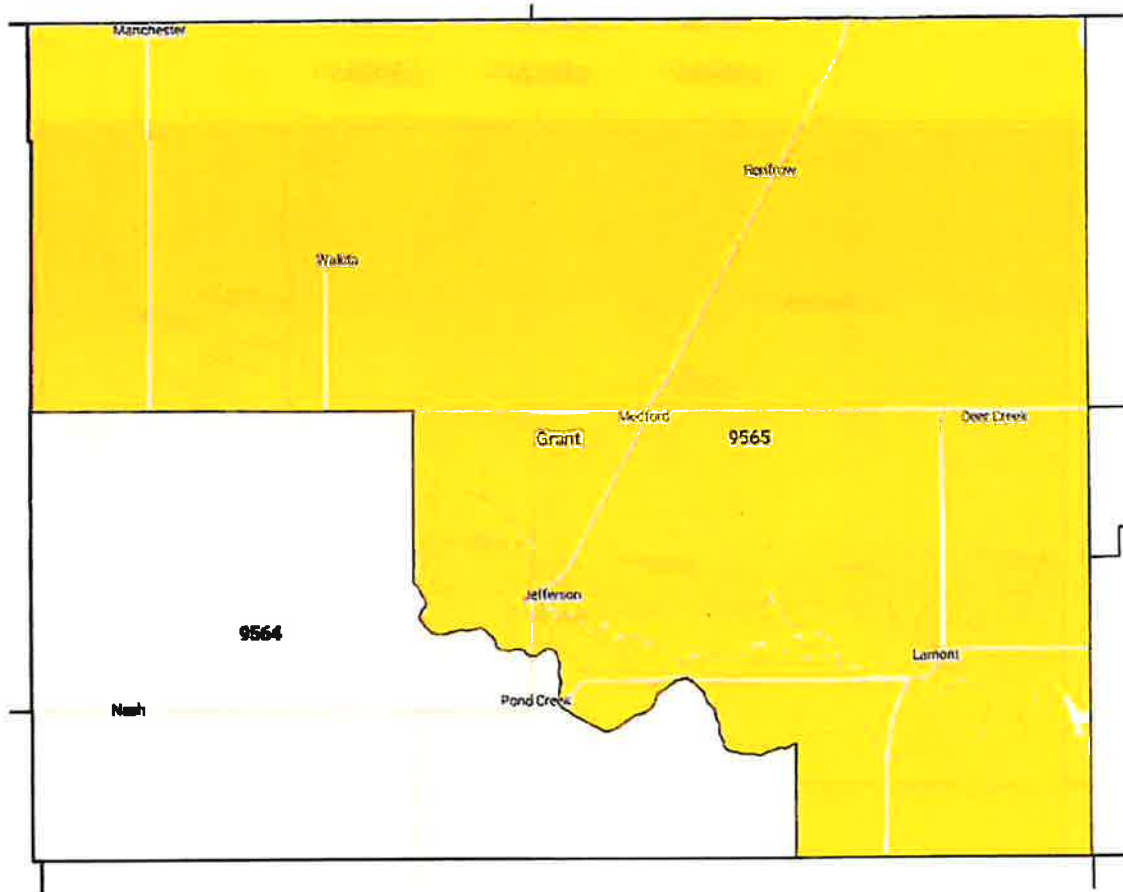
Assessment Area

Sumner County, Kansas – All census tracts



Assessment Area

Grant County, Oklahoma – Census Tract 9565.00



Loan-to-Deposit Ratio

The bank's loan-to-deposit ratio for each quarter of the prior calendar year.

	<u>2025</u>
1st Quarter (Jan-Mar)	75.56%
2nd Quarter (Apr-June)	74.74%
3rd Quarter (July-Sept)	72.29%
4th Quarter (Oct-Dec)	66.85 %

FEE SCHEDULE
Fees and Services

IMPACT BANK
206 E HARVEY AVE
WELLINGTON, Kansas 67152
MEMBER FDIC

An overdraft fee of \$25.00 will be charged each attempt an item is presented that would overdraft your account or when an overdraft item is paid by check or draft, in-person withdrawal, ATM withdrawal, or other electronic means.

FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

Account Early Closing Fee	\$25.00
Automatic Transfer Authorizations - for overdraft sweeps to the credited account	\$5.00
Bank Money Orders	\$3.00
Cashier's Checks	\$3.00
Chargeback fee (per item) *For Business Accounts Only*	\$5.00
Domestic Incoming Wire Fee	\$5.00
Domestic Outgoing Wire Fee	\$15.00
Dormant Account	\$5.00
Duplicate Statement Charge - Monthly	\$5.00
Expediting fee for debit cards by FedEx	\$25.00
Fax/Copier Use - Per page - Maximum of 3 pages	\$1.00
Free Account Customers using Non-IMPACT ATM's - per transaction	\$3.00
International Incoming Wire Fee	\$15.00
International Outgoing Wire Fee	\$50.00
Money Gram Money Orders	\$3.00
Overdraft Fee	\$25.00
Printed copies of checks/deposit images over 60 days old	\$5.00
Research/Bookkeeping Service Fees - Minimum one hour	\$35.00
Research/Bookkeeping Service Fees - Per printed page	\$1.00
Returned Fee	\$25.00
Safe Deposit Box Annual Fee - Caldwell 10x10.5	\$60.00
Safe Deposit Box Annual Fee - Caldwell 3x10	\$25.00
Safe Deposit Box Annual Fee - Caldwell 3x10.5	\$25.00
Safe Deposit Box Annual Fee - Caldwell 3x11.5	\$25.00
Safe Deposit Box Annual Fee - Caldwell 3x4.5	\$15.00
Safe Deposit Box Annual Fee - Caldwell 3x5.5	\$15.00
Safe Deposit Box Annual Fee - Caldwell 4.5x5.5	\$20.00
Safe Deposit Box Annual Fee - Caldwell 5.5x10	\$40.00
Safe Deposit Box Annual Fee - Caldwell 5.5x11.5	\$40.00
Safe Deposit Box Annual Fee - Caldwell 5.5x5.5	\$20.00
Safe Deposit Box Annual Fee - Caldwell 5x10.5	\$25.00
Safe Deposit Box Annual Fee - Wellington 10.5x10.5	\$50.00
Safe Deposit Box Annual Fee - Wellington 2x5	\$6.00
Safe Deposit Box Annual Fee - Wellington 3x10.5	\$15.00
Safe Deposit Box Annual Fee - Wellington 3x5	\$10.00
Safe Deposit Box Annual Fee - Wellington 5x10.5	\$25.00
Safe Deposit Box Annual Fee - Wellington 5x5	\$15.00
Safe Deposit Box Drilling Fee (No Keys or Non-Payment)	\$175.00
Safe Deposit Box Lost Key Fee (1)	\$50.00
Stop Payment Request	\$25.00



PUBLIC DISCLOSURE

March 24, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Impact Bank
RSSD# 369453

206 East Harvey Street
Wellington, Kansas 67152

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

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

TABLE OF CONTENTS

Institution's Community Reinvestment Act Rating	2
Scope of Examination	2
Description of Institution	2
Description of Assessment Area	3
Conclusions With Respect to Performance Criteria	6
Fair Lending or Other Illegal Credit Practices Review	11
Appendix A – Map of the Assessment Area	12
Appendix B – Demographic Information	13
Appendix C – Glossary	14

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Impact Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects an excellent distribution among businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2021, 2022, and 2023) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's only AA. Examiners reviewed the following data:

- The bank's 16-quarter average NLTD ratio
- Statistical samples of small business and small farm loans originated between January 1, 2023, and December 31, 2023, including 65 small business loans selected from a universe of 95 loans and 105 small farm loans selected from a universe of 217 loans. Both products were weighted equally throughout the evaluation.

DESCRIPTION OF INSTITUTION

Impact Bank is a community bank headquartered in Wellington, Kansas. The bank's characteristics include:

- The bank is a wholly owned subsidiary of First Financial Corporation.
- The bank has total assets of \$161.9 million as of September 30, 2024.

- In addition to its main office in Wellington, Kansas, the bank has one additional office located in Caldwell, Kansas.
- The bank operates a full-service automated teller machine (ATM) at the main office in Wellington and a cash-dispensing only ATM at the Caldwell branch. In addition, the bank operates a standalone ATM in Caldwell and five standalone ATMs in Wellington Kansas.
- As shown in the table below, the bank's primary business focus is commercial and agricultural lending.

Table 1

Composition of Loan Portfolio as of September 30, 2024		
Loan Type	\$(000)	%
Construction and Land Development	18,054	17.2
Farmland	15,350	14.6
1- to 4-Family Residential Real Estate	7,272	6.9
Multifamily Residential Real Estate	1,780	1.7
Nonfarm Nonresidential Real Estate	22,018	21.0
Agricultural	21,021	20.0
Commercial and Industrial	15,094	14.4
Consumer	4,060	3.9
Other	362	0.3
Gross Loans	105,011	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its February 1, 2021 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank's Wichita Metropolitan AA is comprised of Sumner County, which is part of the four-county Wichita, Kansas Metropolitan Statistical Area (MSA), and one contiguous census tract in Grant County, Oklahoma. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The AA delineation is comprised of 7 census tracts: 5 middle- and 2 upper-income tracts based on the most recent 2016-2020 American Community Survey (ACS) data.
- There have been no changes to the AA since the prior CRA evaluation, although there were changes to the census tract income designations based on 2011-2015 ACS data. At that time, the AA consisted of 7 middle-income census tracts.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share

Report, the bank ranked 1st of 10 FDIC-insured depository institutions operating from 15 locations in the AA, with a total deposit market share of 22.6 percent.

- A community contact was conducted as part of the CRA evaluation to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact represented an area economic development organization.

Table 2

Population Change			
Assessment Area: Wichita Metropolitan¹			
Area	2015 Population	2020 Population	Percent Change
Wichita Metropolitan ¹	28,155	26,551	(5.7)
Sumner County, KS	23,638	22,382	(5.3)
Grant County, OK ¹	4,517	4,169	(7.7)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Kansas	2,892,987	2,937,880	1.6

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

¹All data presented is at the county level and some values are different for this AA, which includes a partial county.

- Wellington, Kansas is the county seat of Sumner County and the largest town in the AA with a population of 7,550 in 2020.
- According to 2020 ACS data, the AA population was 25,108, with 2,726 residents in the Grant County, Oklahoma census tract.

Table 3

Median Family Income Change			
Assessment Area: Wichita Metropolitan¹			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Wichita Metropolitan ¹	69,157	69,043	(0.2)
Sumner County, KS	70,945	70,220	(1.0)
Grant County, OK ¹	66,300	71,313	7.6
NonMSA Oklahoma	56,258	58,565	4.1
Kansas	72,535	77,620	7.0

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

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

¹All data presented is at the county level and some values are different for this AA, which includes a partial county.

- The portion of low- and moderate-income (LMI) families in the AA, at 39.5 percent, was comparable to figures for the Wichita MSA and the state of Kansas, at 38.0 percent and 36.0 percent, respectively.
- The 2020 ACS data indicates the percentage of AA families below the poverty level, at 9.1 percent, was comparable to the figure of 8.7 percent for the Wichita MSA and above the figure for the state of Kansas, at 7.6 percent.

Table 4

Housing Cost Burden Assessment Area: Wichita Metropolitan¹						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Wichita Metropolitan ¹	52.1	19.8	28.6	44.4	23.1	14.8
Sumner County, KS	51.0	21.9	30.2	47.5	27.4	16.0
Grant County, OK ¹	67.5	5.7	16.6	30.8	2.0	8.2
NonMSA Oklahoma	66.5	30.6	35.0	48.2	22.2	14.9
Kansas	75.7	29.8	38.2	58.1	26.8	15.3

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy
¹All data presented is at the county level and some values are different for this AA, which includes a partial county.

- The AA housing affordability ratio¹ of 58.7 percent was higher than figures for the Wichita MSA and state of Kansas, at 40.4 percent and 38.8 percent, respectively.
- The AA's median housing value of \$91,828 was well below figures for the Wichita MSA and state of Kansas, at \$144,240 and \$157,600, respectively.
- A community contact discussed a critical need for housing in the Wellington area.

Table 5

Unemployment Rates Assessment Area: Wichita Metropolitan¹					
Area	2019	2020	2021	2022	2023
Wichita Metropolitan ¹	3.1	7.2	3.9	2.7	2.6
Sumner County, KS	3.4	8.2	4.2	3.0	2.7
Grant County, OK ¹	2.0	3.4	2.7	1.9	2.0
NonMSA Oklahoma	3.4	6.1	4.0	3.2	3.4
Kansas	3.2	5.8	3.3	2.6	2.7

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics
¹All data presented is at the county level and some values are different for this AA, which includes a partial county.

- Unemployment rates in 2023 were slightly lower or identical to pre-pandemic levels noted in 2019.
- Major employment sectors in the AA include Manufacturing (1,902 employees), Educational Services (1,219), and Health Care and Social Assistance (1,123).

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall lending test performance is Satisfactory.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and geographic locations.

The bank's NLTD ratio is reasonable. The bank's 16-quarter average NLTD ratio of 63.4 percent is less than those of the similarly situated banks with ratios ranging from 65.2 percent to 97.3 percent. However, three of the five similarly situated banks' NLTD ratios range from 65.2 percent to 68.0 percent, which is more comparable to the bank's NLTD ratio of 63.4 percent.

Table 6

Comparative NLTD Ratios December 31, 2020 – September 30, 2024			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			16 Quarter Average
Impact Bank	Wellington, KS	161,907	63.4
Similarly Situated Institutions			
Vintage Bank Kansas	Leon, KS	250,245	67.6
Carson Bank	Mulvane, KS	189,589	68.0
State Exchange Bank	Lamont, OK	121,059	97.3
Conway Bank	Conway Springs, OK	108,250	81.2
Valley State Bank	Belle Plaine, OK	194,032	65.2

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans, by number and dollar volume, inside the AA.

Table 7

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Small Business	49	75.4	2,532	57.1	16	24.6	1,903	42.9
Small Farm	91	86.7	9,750	86.6	14	13.3	1,509	13.4
Total Loans	140	82.4	12,282	78.3	30	17.6	3,412	21.7

Note: Percentages may not total 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA for both products reviewed. Limited weight was applied to this lending test criterion as there were no LMI census tracts in the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of small business lending among middle-income census tracts was above the area demographic figure, which represents the percentage of businesses located in each respective census tract designation. Bank lending in upper-income census tracts was below the demographic figure. In addition, an analysis of lending dispersion was conducted and revealed no conspicuous gaps or lapses.

Table 8

Distribution of 2023 Small Business Lending By Income Level of Geography Assessment Area: Wichita Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	46	93.9	2,510	99.1	69.1
Upper	3	6.1	23	0.9	30.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	49	100.0	2,532	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Small Farm Lending

The geographic distribution of small farm lending is reasonable. The distribution of small farm lending among middle-income census tracts was comparable to the area demographic figure, while the distribution in upper-income census tracts was below the demographic figure. Furthermore, an analysis of lending dispersion was conducted and revealed no conspicuous gaps or lapses.

Table 9

Distribution of 2023 Small Farm Lending By Income Level of Geography Assessment Area: Wichita Metropolitan					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	80	87.9	8,537	87.6	77.4
Upper	11	12.1	1,213	12.4	22.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	91	100.0	9,750	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Lending to Businesses and Farms of Different Sizes

This performance criterion evaluates the bank's lending to businesses and farms of different revenue sizes. The bank's overall distribution reflects an excellent distribution among businesses and farms of different sizes. The bank's distribution of lending to small businesses was excellent while small farm lending was reasonable. The bank's small business lending carried greater weight in the overall analysis based on the volume of commercial loans in the bank's loan portfolio.

Small Business Lending

The borrower distribution of small business lending is excellent. The bank's performance was comparable to the demographic figure, which represents the percentage of small businesses operating in the AA. While the demographic figure is considered a measure of potential lending opportunity within a given market, aggregate lending data is considered a measure of lending demand. A review of the three-year aggregate lending data reported by large financial institutions in the AA revealed that 72.0 percent of lending by number was to businesses with gross annual revenues of \$1.0 million or less. While the aggregate figure is not a direct comparator to bank performance, it indicates a lower demand for credit from small businesses operating in the AA; and supported the excellent conclusion.

Table 10

TABLE 10

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Wichita Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	45	91.8	1,866	73.7	86.9
Over \$1 Million	3	6.1	626	24.7	9.4
Revenue Unknown	1	2.0	41	1.6	3.7
Total	49	100.0	2,532	100.0	100.0
By Loan Size					
\$100,000 or Less	44	89.8	911	36.0	
\$100,001 - \$250,000	3	6.1	680	26.9	
\$250,001 - \$1 Million	2	4.1	942	37.2	
Total	49	100.0	2,532	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	41	91.1	686	36.8	
\$100,001 - \$250,000	3	6.7	680	36.4	
\$250,001 - \$1 Million	1	2.2	500	26.8	
Total	45	100.0	1,866	100.0	
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank's performance is comparable to the demographic figure, which represents the percentage of small farms operating in the AA. A review of the three-year aggregate data reported by large financial institutions in the AA revealed that 90.0 percent of lending by number was to farms with gross annual revenues of \$1.0 million or less. As previously stated, the aggregate figure is not a direct comparator to bank performance, although it indicates a higher demand for small farm loans by revenue size within the AA, in which the bank's performance did not exceed. As a result, performance was considered reasonable.

Table 11

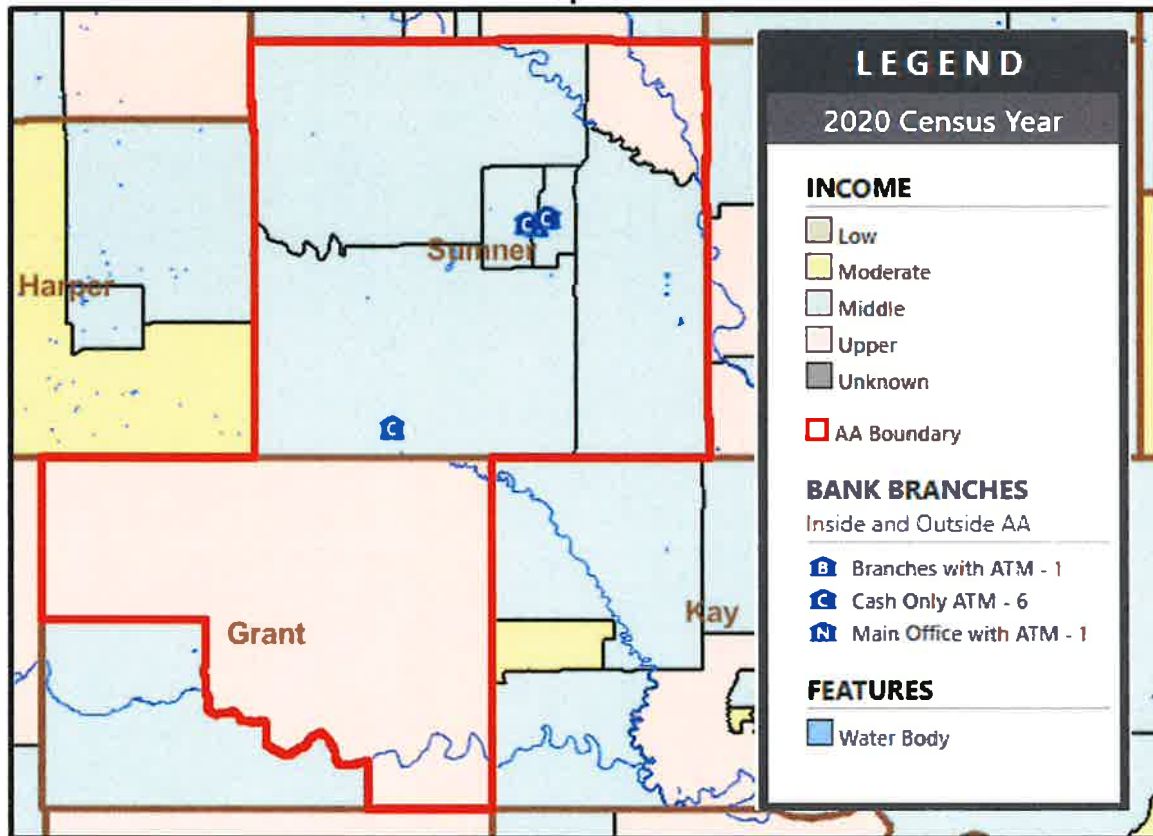
Distribution of 2023 Small Farm Lending By Revenue Size of Farms Assessment Area: Wichita Metropolitan					
	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	71	78.0	5,635	57.8	100.0
Over \$1 Million	20	22.0	4,115	42.2	0.0
Revenue Unknown	0	0.0	0	0.0	0.0
Total	91	100.0	9,750	100.0	100.0
By Loan Size					
\$100,000 or Less	60	65.9	2,266	23.2	
\$100,001 - \$250,000	18	19.8	2,805	28.8	
\$250,001 - \$500,000	13	14.3	4,679	48.0	
Total	91	100.0	9,750	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	52	73.2	1,757	31.2	
\$100,001 - \$250,000	14	19.7	2,187	38.8	
\$250,001 - \$500,000	5	7.0	1,691	30.0	
Total	71	100.0	5,635	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis was identified. However, a substantive violation of Section 5(a) of the Federal Trade Commission Act involving an unfair practice was identified. The violation did not result in a change to the bank's CRA rating as the issue impacted consumer loans only and the number of impacted borrowers was limited. Bank management committed to correcting the violation.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2023 Wichita Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,547	22.3
Moderate	0	0.0	0	0.0	0	0.0	1,190	17.2
Middle	5	71.4	4,810	69.4	500	10.4	1,612	23.2
Upper	2	28.6	2,124	30.6	132	6.2	2,585	37.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	7	100.0	6,934	100.0	632	9.1	6,934	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	8,835	5,265	68.9	59.6	2,261	25.6	1,309	14.8
Upper	3,863	2,379	31.1	61.6	731	18.9	753	19.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	12,698	7,644	100.0	60.2	2,992	23.6	2,062	16.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	638	69.1	564	70.3	54	62.1	20	58.8
Upper	285	30.9	238	29.7	33	37.9	14	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	923	100.0	802	100.0	87	100.0	34	100.0
Percentage of Total Businesses:				86.9		9.4		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	154	77.4	154	77.4	0	0.0	0	0.0
Upper	45	22.6	45	22.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	199	100.0	199	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Brndstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – GLOSSARY

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

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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