CRA **Public File**

Community Reinvestment Act Guideline Holladay Bank & Trust

Holladay Bank & Trust is a State Chartered Bank. Its policy will be to loan only to residents of the State of Utah and in the areas as heretofore designed as a requirement of law. It is the policy of The Board of Directors that the community will be given greater consideration and weight for loan purposes will be identified hereafter:

"Salt Lake and Surrounding Areas"

The attached market area map clearly defines the delineated market area. The officer and directors of Holladay Bank & Trust shall communicate with various civic community leaders to learn the community credit needs.

The officers and directors of Holladay Bank & Trust shall communicate with various civic and community leaders to learn of the community credit needs.

Holladay Bank & Trust shall maintain at its main office 2020 East Murray-Holladay Road, Holladay Utah 84117, this statement and community reinvestment act file. Any comment received by the bank and its responses thereto shall be kept in the file along with periodic reports of the officers to the board pertaining to the community reinvestment act. A copy of said file will be maintained at each and every branch of said Holladay Bank & Trust.

The Board shall yearly review said CRA file and make any needed changes required by law or community needs as duly judged and shall be duly noted in the minutes of the Board.

It is the intention of the Holladay Bank & Trust to publicize special credit related programs to help all of our population such as home improvement and modernization loans and consumer loans.

Listed below are the types of loans which Holladay Bank & Trust makes in the community. The kinds of credit we can make available are limited by law and government regulations. Some of these regulations operate by tying the volume of lending in certain categories to types of deposits we have and other variables. Since these can change from time to time, we may be temporarily "out of the market" for certain types of loans at certain times. Also, changes in economic conditions sometimes make it impossible or impractical to make a certain type of loan. For instance, where local laws restrict the rate we can charge for mortgage loans - say, to 8% - but it costs us 9 % to obtain the funds with which to make loans, we obviously cannot continue to make that type of loan. Also, every financial institution must, as a matter of law and good practice, maintain a mix of different types of loans and investments. Finally, the law prohibits undue concentration of loans in geographic areas. For these reasons, an institution may have to plan to devote its funds to many different kinds of loans and this can result in certain types of cerdit being unavailable at a given time.

Holladay Bank & Trust shall consider credit within its delineated area for the following types of

loans:

- Residential loans for five dwelling units and over
- Residential loans for one to four dwellings
- Housing rehabilitation loans
- Home improvement loans
- Small business loans
- Farm loans
- Community Development Loans
- Commercial Loans
- All types of consumer loans
- Commercial Real Estate Loans

Attached hereto and made a part hereof is the Community Reinvestment Act notice which must be provided and furnished to customers by law.

This policy was duly adopted by Board of Directors as of November 30, 1978, to be in compliance with the Community Reinvestment Act.

Holladay Bank & Trust

200 CRA Officer



Locations

HOLLADAY BANK & TRUST

Branch Name:

Holladay Branch

Opening Date:

1974

Branch Address:

P.O. Box 17576 2020 East Murray-Holladay Road Holladay, UT 84117

Hours of Operation:

Lobby Hours: Monday – Friday 9:00 – 5:00 Drive Up Hours Monday – Friday 8:30 – 5:00

Census Tract Code:

1108.00

Branch Name	Opening Date	Branch Address
Holladay Branch	1974	P.O. Box 17576 2020 East Murray- Holladay Road Holladay, UT 84117
	Holladay Bank & Trust Branches Closed	



HOLLADAY BANK & TRUST OFFERS THE FOLLOWING SERVICES AND PRODUCTS

RESIDENTIAL LOANS FOR ONE TO FOUR DWELLINGS RESIDENTIAL LOANS FOR FIVE DWELLING UNITS OR OVER HOUSING REHABILITATION LOANS HOME IMPROVEMENT LOANS SMALL BUSINESS LOANS FARM LOANS COMMUNITY DEVELOPMENT LOANS COMMERICAL LOANS AUTOMOBILE LOANS LINES OF CREDIT ALL TYPES OF CONSUMER LOANS COMMERICAL REAL ESTATE LOANS FREE CHECKING ACCOUNTS SAVINGS ACCOUNTS BUSINESS AND PROFESSIONAL BANKING MONEY MARKET CHECKING CERTIFICATE OF DEPOSIT ACCOUNTS NOW ACCOUNTS SAFETY DEPOSIT BOXES

HOLLADAY BANK & TRUST Service Charges

FREE CHECKING ACCOUNTS

No Monthly Service Charge No Minimum Balance Required Unlimited Check Writing

SAVINGS ACCOUNTS

Dormant Account Fee \$2.50 per month If balance falls below \$50.00 during the statement cycle a \$1.00 fee will be Imposed.

\$1.00 fee per transaction will be imposed at the end of each month for Transactions in excess of the 6 withdrawal limit per month.

NOW ACCOUNTS

A \$4.99 maintenance fee will be imposed every month if the balance in the Account falls below \$500.00 any day of the statement cycle. Dormant Account Fee \$2.50 per month

MONEY MARKET CHECKING

A \$7.50 maintenance fee will be imposed every month if the balance in the Account falls below \$2,500.00 any day of the statement cycle. A \$5.00 fee will be imposed at the end of each month for each check to Third parties in excess of the 6 check limit per month. Dormant Account Fee \$2.50 per month

BUSINESS AND PROFESSIONAL BANKING

Base Service Charge\$1.50 per monthDeposited Item Charge\$0.25 eachDebited Item Charge\$0.07 eachCoin Charge5%For each \$100.00 monthly average collected balance a credit will be appliedAgainst service fees:\$0.25 per \$100

OTHER ACCOUNT FEES

Past Statement Printout Account Research Temporary Statement \$3.00 each \$50.00 per hour & \$3.00 per sheet \$1.00 (an additional \$1.00 to fax)

THE FOLLOWING FEES APPLY TO ALL OF YOUR ACCOUNTS WITH US EXCEPT CERTIFICATES OF DEPOSIT AND TIME DEPOSIT ACCOUNTS:

Overdraft Int. Rate/Account Overdraft

Stop Payment Returned Deposit 18% Interest accrues dailyand begins with first overage\$25.00 per item\$3.00 per item

OVERDRAFT: Insufficient Funds (Created by check, In person withdrawal, ATM withdrawal Or other electronic means): Funds Transfer

\$25.00 per item \$ 2.00 per transfer

MISCELLANEOUS FEES AND CHARGES

Money Orders\$2.00Official Checks\$2.00Counter Checks\$0.10 each



Assessment Area

HOLLADAY BANK & TRUST LOAN CONCENTRATION BY LOCATION

October 31, 2024

COUNTY	GOAL	PORTFOLIO %	LOAN AMOUNT	# LOANS
SALT LAKI	60-75%	63.59%	26,549,705	106
UTAH	10-15%	5.90%	2,463,090	6
DAVIS	5-10%	0.76%	318,558	5
SUMMIT	5-10%	17.03%	7,110,091	18
TOOELE	0-5%	2.57%	1,074,111	2
WEBER	5-10%	2.81%	1,173,188	5
WASATCH	5-10%	1.01%	422,604	4
IRON	0-5%	0.00%	0	0
WASHING	5-10%	0.03%	12,760	1
UINTAH	0-5%	2.11%	880,355	9
OTHER	0-5%	4.18%	1,744,713	5
TOTAL		100.00%	41,749,173	161

POTENTIAL DRAWS AND NEW LOANS APPROVED

SALT LAKE	58.45%	32,129,064
UTAH	6.89%	3,785,138
DAVIS	1.40%	767,629
SUMMIT	20.27%	11,143,055
TOOELE	1.95%	1,074,111
WEBER	2.13%	1,173,188
WASATCH	3.68%	2,021,009
IRON	0.00%	0
WASHINGTON	0.45%	250,000
UINTAH	1.60%	880,355
OTHER	3.17%	1,744,713
TOTAL	100.00%	54,968,262





2012 Int	formation				
Street Address	2020 E 4800 S				
City Name	SALT LK CITY				
State Abbr	UT				
Zip Code	84117				
MSA/MD Code	41620				
State Code	49				
County Code	035				
Tract Code	1108.00				

Legend	
-	Highway
	Tract
	Street

http://maps.ffiec.gov/FFIECMap2010/TGMapSrv.aspx?street_address=2020+E+4800+S&State_abbr=UT&City=SALT+LK+... 3/6/2013

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2024 FFIEC Geocode Census Report

Address: 2020 E Murray Holladay Rd, Salt Lake City, Utah, 84117 MSA: 41620 - SALT LAKE CITY-MURRAY, UT State: 49 - UTAH County: 035 - SALT LAKE COUNTY Tract Code: 1108.00

Summary Census Demographic Information Tract Income Level	Middle
Underserved or Distressed Tract	No
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$115,400
2024 Estimated Tract Median Family Income	\$106,457
2020 Tract Median Family Income	\$83,364
Tract Median Family Income %	92.25
Tract Population	5813
Tract Minority %	16.26
Tract Minority Population	945
Owner-Occupied Units	1715
1- to 4- Family Units	1699

Census Income Information

Tract Income Level	Middle	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$90,360	
2024 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$115,400	
% below Poverty Line	4.86	
Tract Median Family Income %	92.25	
2020 Tract Median Family Income	\$83,364	
2024 Estimated Tract Median Family Income	\$106,457	
2020 Tract Median Household Income	\$58,116	

Census Population Information

Tract Population	5813	
Tract Minority %	16.26	
Number of Families	1489	
Number of Households	2498	
Non-Hispanic White Population	4868	
Tract Minority Population	945	
American Indian Population	18	
Asian/Hawaiian/Pacific Islander Population	213	
Black Population	77	
Hispanic Population	397	
Other/Two or More Races Population	240	

Census Housing Information

Total Housing Units	2652	
1- to 4- Family Units	1699	
Median House Age (Years)	53	
Owner-Occupied Units	1715	
Renter Occupied Units	783	
Owner Occupied 1- to 4- Family Units	1273	
Inside Principal City?	NO	
Vacant Units	154	

2024 FFIEC Census Report - Summary Census Demographic Information MSA/MD: 41620 - SALT LAKE CITY-MURRAY, UT State: 49 - UTAH (UT) County: 035 - SALT LAKE COUNTY



State Code	Contraction of the second s	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1001.00	Middle	No	82.90	\$115,400	\$95,667	\$74,911	2987	39.71	1186	278	539
49	035	1002.00	Upper	No	159.08	\$115,400	\$183,578	\$143,750	1333	15.38	205	311	575
49	035	1003.06	Moderate	No	59.03	\$115,400	\$68,121	\$53,341	6043	67.95	4106	779	1055
49	035	1003.07	Middle	No	86.01	\$115,400	\$99,256	\$77,719	4968	77.56	3853	1046	1195
49	035	1003.08	Moderate	No	56.43	\$115,400	\$65,120	\$50,996	4025	76.12	3064	446	679
49	035	1005.00	Moderate	No	73.85	\$115,400	\$85,223	\$66,735	5893	52.03	3066	1155	1643
49	035	1006.00	Moderate	No	52.78	\$115,400	\$60,908	\$47,700	6699	56.05	3755	1749	2352
49	035	1007.00	Moderate	No	79.02	\$115,400	\$91,189	\$71,406	2683	27.02	725	702	1204
49	035	1008.00	Middle	No	83.48	\$115,400	\$96,336	\$75,435	2562	25.96	665	310	311
49	035	1010.00	Upper	No	155.82	\$115,400	\$179,816	\$140,804	3127	16.89	528	993	1422
49	035	1011.01	Middle	No	107.48	\$115,400	\$124,032	\$97,121	1973	21.59	426	277	594
49	035	1011.02	Middle	No	110.23	\$115,400	\$127,205	\$99,609	3431	22.65	777	493	509
49	035	1012.00	Upper	No	150.25	\$115,400	\$173,389	\$135,766	3972	19.74	784	1165	1466
49	035	1014.01	Low	No	29.20	\$115,400	\$33,697	\$26,389	2171	44.22	960	8	24
49	035	1014.02	Unknown	No	0.00	\$115,400	\$0	\$0	4339	40.56	1760	6	51
49	035	1015.00	Upper	No	144.21	\$115,400	\$166,418	\$130,313	3288	23.91	786	395	872
49	035	1016.00	Middle	No	93.27	\$115,400	\$107,634	\$84,286	3742	24.40	913	494	817
49	035	1017.00	Moderate	No	74.18	\$115,400	\$85,604	\$67,031	3582	29.56	1059	326	806
49	035	1018.00	Moderate	No	72.62	\$115,400	\$83,803	\$65,625	3347	27.31	914	373	879
49	035	1019.00	Moderate	No	57.92	\$115,400	\$66,840	\$52,344	3103	33.13	1028	144	127
49	035	1020.00	Moderate	No	77.29	\$115,400	\$89,193	\$69,844	2837	31.79	902	360	756
49	035	1021.00	Moderate	No	54.54	\$115,400	\$62,939	\$49,286	2378	38.10	906	219	108
49	035	1023.00	Middle	No	98.72	\$115,400	\$113,923	\$89,205	3153	43.29	1365	290	494
49	035	1025.01	Moderate	No	74.97	\$115,400	\$86,515	\$67,743	3134	47.13	1477	203	162
49	035	1025.02	Upper	No	124.68	\$115,400	\$143,881	\$112,667	2062	32.93	679	221	35
49	035	1026.00	Moderate	No	71.47	\$115,400	\$82,476	\$64,583	4391	60.99	2678	843	1542

* Will automatically be included in the 2025 Distressed or Underserved Tract List

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State Code		Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1027.01	Moderate	No	57.79	\$115,400	\$66,690	\$52,226	4752	66.84	3176	1049	1659
49	035	1027.02	Moderate	No	66.40	\$115,400	\$76,626	\$60,000	3704	77.27	2862	541	784
49	035	1028.01	Moderate	No	58.07	\$115,400	\$67,013	\$52,477	5919	70.15	4152	1388	1888
49	035	1028.02	Moderate	No	69.97	\$115,400	\$80,745	\$63,233	4888	70.95	3468	557	959
49	035	1029.00	Moderate	No	58.87	\$115,400	\$67,936	\$53,203	5768	49.24	2840	390	841
49	035	1030.00	Middle	No	96.59	\$115,400	\$111,465	\$87,281	2756	31.68	873	712	1310
49	035	1031.00	Middle	No	111.04	\$115,400	\$128,140	\$100,337	4144	31.61	1310	1046	1625
49	035	1032.00	Middle	No	108.17	\$115,400	\$124,828	\$97,750	4433	24.97	1107	996	1636
49	035	1033.00	Middle	No	108.50	\$115,400	\$125,209	\$98,044	4256	20.68	880	665	1411
49	035	1034.00	Middle	No	103.61	\$115,400	\$119,566	\$93,625	4167	19.58	816	1087	1974
49	035	1035.00	Upper	No	142.37	\$115,400	\$164,295	\$128,646	4031	15.50	625	1097	1748
49	035	1036.00	Upper	No	166.39	\$115,400	\$192,014	\$150,357	2671	14.15	378	844	1131
49	035	1037.00	Upper	No	123.67	\$115,400	\$142,715	\$111,750	2631	11.90	313	843	1095
49	035	1038.00	Upper	No	169.32	\$115,400	\$195,395	\$153,000	2325	15.27	355	697	966
49	035	1039.00	Middle	No	116.39	\$115,400	\$134,314	\$105,174	3605	17.75	640	1187	1478
49	035	1040.00	Upper	No	175.83	\$115,400	\$202,908	\$158,889	3302	14.66	484	952	1177
49	035	1041.00	Upper	No	201.96	\$115,400	\$233,062	\$182,500	2941	15.03	442	969	996
49	035	1042.00	Upper	No	172.49	\$115,400	\$199,053	\$155,867	6895	16.81	1159	2275	2298
49	035	1043.00	Middle	No	111.17	\$115,400	\$128,290	\$100,455	2901	21.23	616	459	799
49	035	1044.00	Upper	No	171.19	\$115,400	\$197,553	\$154,688	2067	8.42	174	586	768
49	035	1047.00	Middle	No	111.58	\$115,400	\$128,763	\$100,828	4818	16.33	787	1477	1906
49	035	1048.00	Middle	No	104.21	\$115,400	\$120,258	\$94,167	5263	16.23	854	1343	2043
49	035	1049.00	Middle	No	86.08	\$115,400	\$99,336	\$77,782	3135	29.12	913	760	1390
49	035	1101.03	Upper	No	152.32	\$115,400	\$175,777	\$137,639	3562	12.69	452	1261	1648
49	035	1101.04	Upper	No	224.10	\$115,400	\$258,611	\$202,500	5557	15.78	877	1806	2104
49	035	1101.05	Upper	No	189.68	\$115,400	\$218,891	\$171,397	2011	13.48	271	665	814
49	035	1101.06	Upper	No	140.28	\$115,400	\$161,883	\$126,765	2519	12.66	319	639	1394
49	035	1102.00	Upper	No	122.72	\$115,400	\$141,619	\$110,893	5070	13.16	667	1508	1932
49	035	1103.00	Middle	No	114.49	\$115,400	\$132,121	\$103,457	5802	16.94	983	1597	2144

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49 035 1104.01 Middle No 119.06 \$115,400 \$137,395 \$107,599 3401 21.41 728 777 824 49 035 1106.00 Upper No 127.88 \$115,400 \$147,574 \$115,566 3873 15.03 \$82 965 1187 49 035 1106.00 Upper No 127.88 \$115,400 \$140,223 \$106,798 5825 12.12 706 157.11 1816 49 035 1107.01 Middle No 125.07 \$115,400 \$121,251 \$84,942 5199 14.71 765 1300 1737 49 035 1108.00 Middle No 125.07 \$115,400 \$106,457 \$85,364 5813 16.26 945 1715 1699 49 035 1110.00 Upper No 161.16 \$115,400 \$167,35 \$138,393 4923 12.65 656 844 966 49 035 1111.00 Upper No 140.68 \$115,400 \$	State Code		Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49 0.55 1105.00 Upper No 123.65 \$114,400 \$149,615 \$117,155 6425 12.67 814 1803 2004 49 035 1106.00 Upper No 121.51 \$115,400 \$140,223 \$109,798 5825 12.12 706 1571 1816 49 035 1107.01 Middle No 92.79 \$115,400 \$107,080 \$88,846 3798 24.54 932 591 910 49 035 1107.02 Middle No 92.25 \$115,400 \$106,457 \$83,844 5813 16.26 945 1715 1689 49 035 1100.00 Upper No 161.16 \$115,400 \$162,457 \$83,844 5813 16.26 945 1237 1548 49 035 1110.02 Upper No 140.68 \$115,400 \$162,475 \$527,77 3847 26.62 1024 1179 1319	49	035	1104.01	Middle	No	119.06	\$115,400	\$137,395	\$107,589	3401	21.41	728	777	824
49 035 1106.00 Upper No 121.51 \$115.40 5109.788 5825 12.12 706 1571 1816 49 035 1107.01 Middle No 92.79 \$115.400 \$102,028 583.846 3798 24.54 932 591 910 49 035 1107.02 Middle No 92.25 \$115.400 \$102,735 \$138.393 4823 12.63 622 1251 1626 49 035 110.01 Upper No 161.16 \$115,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 111.00 Upper No 161.46 \$116,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.05 Moderate No 120.52 \$111,400 \$162,75 \$53,777 3847 26.62 102.41 1739 1398 49	49	035	1104.02	Upper	No	127.88	\$115,400	\$147,574	\$115,556	3873	15.03	582	965	1187
49 035 1107.01 Middle No 92.79 \$115,400 \$107,08 \$83,846 3788 24.54 932 \$91 49 035 1107.02 Middle No 105.07 \$115,400 \$121,251 \$84,942 5199 14.71 765 1300 1737 49 035 1108.00 Middle No 92.25 \$115,400 \$176,735 \$138,393 4923 12.63 622 1251 1626 49 035 1110.01 Upper No 161.16 \$115,400 \$162,345 \$127,120 5627 10.03 1071 1330 1731 49 035 1111.04 Upper No 120.52 \$115,400 \$120,775 \$53,777 3847 26.62 1024 1179 1319 49 035 1111.06 Middle No 136.30 \$115,400 \$102,775 \$80,481 3090 22.52 666 445 832 49	49	035	1105.00	Upper	No	129.65	\$115,400	\$149,616	\$117,155	6425	12.67	814	1803	2094
49 035 1107.02 Middle No 105.07 \$115,400 \$121,251 \$94,942 5199 14.71 765 1300 1737 49 035 1108.00 Middle No 9225 \$115,400 \$106,457 \$83,384 \$6813 16.26 945 1715 1699 49 035 1100.00 Upper No 153.15 \$115,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.04 Upper No 140.68 \$115,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.05 Moderate No 59.51 \$115,400 \$168,975 \$53,777 3847 26.62 1024 1179 1319 49 035 1111.06 Middle No 19.05 \$115,400 \$162,351 \$121,645 3332 14.56 485 1044 1115	49	035	1106.00	Upper	No	121.51	\$115,400	\$140,223	\$109,798	5825	12.12	706	1571	1816
49 035 1108.00 Middle No 92.25 \$115,400 \$106,457 \$83,364 5813 16.26 945 1715 1699 49 035 1109.00 Upper No 153,15 \$115,400 \$176,735 \$138,393 4923 12.63 6622 1231 1569 49 035 1110.01 Upper No 161.16 \$115,400 \$185,979 \$145,625 4594 10.34 475 1237 1549 49 035 1111.04 Upper No 140.68 \$115,400 \$185,979 \$145,625 4594 10.34 475 1237 1549 49 035 1111.05 Moderate No 59.51 \$115,400 \$162,345 \$127,170 3847 26.62 1024 1179 1319 49 035 1111.06 Middle No 139.66 \$112,151 \$86,179 3118 19.37 604 937 1036 49	49	035	1107.01	Middle	No	92.79	\$115,400	\$107,080	\$83,846	3798	24.54	932	591	910
49 035 1109.00 Upper No 153.15 \$115,400 \$176,735 \$138,393 4923 12.63 622 1251 166.66 49 035 1110.01 Upper No 161.16 \$115,400 \$185,979 \$145,625 4594 10.34 475 1237 1549 49 035 1110.02 Upper No 160.68 \$115,400 \$182,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.05 Moderate No 59.51 \$115,400 \$182,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.06 Middle No 59.51 \$115,400 \$102,775 \$60,481 3090 22.52 696 445 832 49 035 1111.08 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 14,56 485 1044 1115	49	035	1107.02	Middle	No	105.07	\$115,400	\$121,251	\$94,942	5199	14.71	765	1300	1737
49 035 1110.01 Upper No 161.16 \$115.400 \$185.979 \$146.625 4594 10.34 475 1237 1549 49 035 1110.02 Upper No 140.68 \$115,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.04 Upper No 120.52 \$115,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.05 Moderate No 120.52 \$115,400 \$162,345 \$127,51 \$98,179 3118 19.37 664 937 1036 49 035 111.07 Middle No 134.62 \$115,400 \$152,551 \$121,645 3332 14.56 485 1044 1115 49 035 1111.09 Upper No 133.70 \$115,400 \$152,920 3233 1574 509 1217 1169	49	035	1108.00	Middle	No	92.25	\$115,400	\$106,457	\$83,364	5813	16.26	945	1715	1699
49 035 1110.02 Upper No 140.68 \$115,400 \$162,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.04 Upper No 120.52 \$115,400 \$132,345 \$127,120 5627 19.03 1071 1330 1731 49 035 1111.05 Moderate No 59.51 \$115,400 \$162,345 \$127,551 \$56777 3847 26.62 1024 1179 1319 49 035 1111.06 Middle No 105.33 \$115,400 \$121,551 \$95,179 3118 19.37 604 937 1036 49 035 1111.07 Middle No 134.62 \$115,400 \$152,551 \$95,179 3118 19.37 604 937 1036 49 035 1111.09 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 15.74 509 1217 <	49	035	1109.00	Upper	No	153.15	\$115,400	\$176,735	\$138,393	4923	12.63	622	1251	1626
49 035 1111.04 Upper No 120.52 \$115,400 \$139,080 \$108,910 2982 18.95 565 844 966 49 035 1111.05 Moderate No 59.51 \$115,400 \$68,675 \$53,777 3847 26.62 1024 1179 1319 49 035 1111.06 Middle No 105.33 \$115,400 \$121,551 \$95,179 3118 19.37 604 937 1036 49 035 1111.07 Middle No 89.06 \$115,400 \$102,775 \$80,481 3090 22.52 696 445 832 49 035 1111.08 Upper No 133.70 \$115,400 \$152,290 \$120,820 323 15.74 509 1217 1169 49 035 1112.01 Middle No 98.95 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1166	49	035	1110.01	Upper	No	161.16	\$115,400	\$185,979	\$145,625	4594	10.34	475	1237	1549
49 035 1111.05 Moderate No 59.51 \$115,400 \$68,675 \$53,777 3847 26.62 1024 1179 1319 49 035 1111.06 Middle No 105.33 \$115,400 \$121,551 \$95,179 3118 19.37 604 937 1036 49 035 1111.07 Middle No 89.06 \$115,400 \$102,775 \$80,481 3090 22.52 696 445 832 49 035 1111.08 Upper No 134.62 \$115,400 \$155,351 \$121,645 3332 14.56 485 1044 1115 49 035 111.09 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 15.74 509 1217 1169 49 035 1112.01 Middle No 98.85 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1168 49 035 1113.02 Upper No 138.65 \$115,400 \$14	49	035	1110.02	Upper	No	140.68	\$115,400	\$162,345	\$127,120	5627	19.03	1071	1330	1731
49 035 1111.06 Middle No 105.33 \$115,400 \$121,551 \$95,179 3118 19.37 604 937 1036 49 035 1111.07 Middle No 89.06 \$115,400 \$102,775 \$80,481 3090 22.52 696 445 832 49 035 1111.08 Upper No 134.62 \$115,400 \$155,351 \$121,645 3332 14.56 485 1044 1115 49 035 1111.09 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 15.74 509 1217 1169 49 035 1112.01 Middle No 98.95 \$115,400 \$114,188 \$89,417 2632 20.48 539 681 812 49 035 1112.02 Middle No 98.85 \$114,00 \$114,073 \$89,323 4664 21.87 1020 912 1166 49 035 1113.02 Upper No 124.21 \$115,400 \$160,00	49	035	1111.04	Upper	No	120.52	\$115,400	\$139,080	\$108,910	2982	18.95	565	844	966
49 035 1111.07 Middle No 89.06 \$115,400 \$102,775 \$80,481 3090 22.52 696 445 832 49 035 1111.08 Upper No 134.62 \$115,400 \$155,351 \$121,645 3332 14.56 485 1044 1115 49 035 1111.09 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 15.74 509 1217 1169 49 035 1112.01 Middle No 98.95 \$114,000 \$114,188 \$89,417 2632 20.48 539 681 812 49 035 1112.02 Middle No 98.85 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1166 49 035 1113.02 Upper No 124.21 \$115,400 \$160,002 \$125,286 5878 12.90 758 1919 2169 49 035 1113.04 Upper No 124.21 \$115,400 \$133,	49	035	1111.05	Moderate	No	59.51	\$115,400	\$68,675	\$53,777	3847	26.62	1024	1179	1319
49 035 1111.08 Upper No 134.62 \$115,400 \$155,351 \$121,645 3332 14.56 485 1044 1115 49 035 1111.09 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 15.74 509 1217 1169 49 035 1112.01 Middle No 98.95 \$115,400 \$114,188 \$89,417 2632 20.48 539 681 812 49 035 1112.02 Middle No 98.95 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1166 49 035 1113.02 Upper No 138.65 \$115,400 \$143,338 \$112,237 3692 14.14 522 940 1343 49 035 1113.04 Upper No 115.82 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1113.06 Middle No 111.47 \$115,400 \$8	49	035	1111.06	Middle	No	105.33	\$115,400	\$121,551	\$95,179	3118	19.37	604	937	1036
49 035 1111.09 Upper No 133.70 \$115,400 \$154,290 \$120,820 3233 15.74 509 1217 1169 49 035 1112.01 Middle No 98.95 \$115,400 \$114,188 \$89,417 2632 20.48 539 681 812 49 035 1112.02 Middle No 98.85 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1166 49 035 1113.02 Upper No 138.65 \$115,400 \$160,002 \$125,286 5878 12.90 758 1919 2169 49 035 1113.04 Upper No 124.21 \$115,400 \$143,338 \$112,237 3692 14.14 522 940 1343 49 035 1113.05 Middle No 115.82 \$115,400 \$133,656 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$8	49	035	1111.07	Middle	No	89.06	\$115,400	\$102,775	\$80,481	3090	22.52	696	445	832
49 035 1112.01 Middle No 98.95 \$115,400 \$114,188 \$89,417 2632 20.48 539 681 812 49 035 1112.02 Middle No 98.85 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1166 49 035 1113.02 Upper No 138.65 \$115,400 \$160,002 \$125,286 5878 12.90 758 1919 2169 49 035 1113.04 Upper No 124.21 \$115,400 \$143,338 \$112,237 3692 14.14 522 940 1343 49 035 1113.05 Middle No 115.82 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1114.00 Moderate No 70.60 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400	49	035	1111.08	Upper	No	134.62	\$115,400	\$155,351	\$121,645	3332	14.56	485	1044	1115
49 035 1112.02 Middle No 98.85 \$115,400 \$114,073 \$89,323 4664 21.87 1020 912 1166 49 035 1113.02 Upper No 138.65 \$115,400 \$160,002 \$125,286 5878 12.90 758 1919 2169 49 035 1113.04 Upper No 124.21 \$115,400 \$143,338 \$112,237 3692 14.14 522 940 1343 49 035 1113.05 Middle No 115.82 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1113.06 Middle No 111.47 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$81,472 \$63,801 6976 41.03 2862 1118 1989 49 035 1116.01 Middle No 58.89 \$115,400 <td< td=""><td>49</td><td>035</td><td>1111.09</td><td>Upper</td><td>No</td><td>133.70</td><td>\$115,400</td><td>\$154,290</td><td>\$120,820</td><td>3233</td><td>15.74</td><td>509</td><td>1217</td><td>1169</td></td<>	49	035	1111.09	Upper	No	133.70	\$115,400	\$154,290	\$120,820	3233	15.74	509	1217	1169
49 035 1113.02 Upper No 138.65 \$115,400 \$140,002 \$125,286 5878 12.90 758 1919 2169 49 035 1113.04 Upper No 124.21 \$115,400 \$143,338 \$112,237 3692 14.14 522 940 1343 49 035 1113.05 Middle No 115.82 \$115,400 \$143,338 \$112,237 3692 14.14 522 940 1343 49 035 1113.05 Middle No 115.82 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1113.06 Middle No 111.47 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$81,472 \$63,801 6976 41.03 2862 1118 1989 49 035 1116.01 Middle No 58.89 \$115,400 <t< td=""><td>49</td><td>035</td><td>1112.01</td><td>Middle</td><td>No</td><td>98.95</td><td>\$115,400</td><td>\$114,188</td><td>\$89,417</td><td>2632</td><td>20.48</td><td>539</td><td>681</td><td>812</td></t<>	49	035	1112.01	Middle	No	98.95	\$115,400	\$114,188	\$89,417	2632	20.48	539	681	812
49 035 1113.04 Upper No 124.21 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1113.05 Middle No 115.82 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1113.06 Middle No 111.47 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1114.00 Moderate No 111.47 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$81,472 \$63,801 6976 41.03 2862 1118 1989 49 035 1116.01 Moderate No 58.89 \$115,400 \$67,959 \$53,214 2529 53.06 1342 219 400 49 035 1116.01 Middle No 86.80 \$115,400	49	035	1112.02	Middle	No	98.85	\$115,400	\$114,073	\$89,323	4664	21.87	1020	912	1166
49 035 1113.05 Middle No 115.82 \$115,400 \$133,656 \$104,659 3872 15.39 596 1209 1483 49 035 1113.06 Middle No 111.47 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$67,959 \$53,214 2529 53.06 1342 219 400 49 035 1116.01 Middle No 86.80 \$115,400 \$100,167 \$78,438 4449 54.60 2429 407 702 49 035 1116.02 Low No 43.40 \$115,400 \$50,084 \$39,220 6762 51.88 3508 458 492 49 035 1117.01 Low No 45.76 \$115,400 \$52,807 <td>49</td> <td>035</td> <td>1113.02</td> <td>Upper</td> <td>No</td> <td>138.65</td> <td>\$115,400</td> <td>\$160,002</td> <td>\$125,286</td> <td>5878</td> <td>12.90</td> <td>758</td> <td>1919</td> <td>2169</td>	49	035	1113.02	Upper	No	138.65	\$115,400	\$160,002	\$125,286	5878	12.90	758	1919	2169
49 035 1113.06 Middle No 111.47 \$115,400 \$128,636 \$100,729 2454 17.64 433 455 510 49 035 1114.00 Moderate No 70.60 \$115,400 \$81,472 \$63,801 6976 41.03 2862 1118 1989 49 035 1116.01 Moderate No 58.89 \$115,400 \$67,959 \$53,214 2529 53.06 1342 219 400 49 035 1116.01 Middle No 86.80 \$115,400 \$100,167 \$78,438 4449 54.60 2429 407 702 49 035 1116.02 Low No 43.40 \$115,400 \$50,084 \$39,220 6762 51.88 3508 458 492 49 035 1117.01 Low No 45.76 \$115,400 \$52,807 \$41,356 5452 54.68 2981 677 1328	49	035	1113.04	Upper	No	124.21	\$115,400	\$143,338	\$112,237	3692	14.14	522	940	1343
49 035 1114.00 Moderate No 70.60 \$115,400 \$81,472 \$63,801 6976 41.03 2862 1118 1989 49 035 1115.00 Moderate No 58.89 \$115,400 \$67,959 \$53,214 2529 53.06 1342 219 400 49 035 1116.01 Middle No 86.80 \$115,400 \$100,167 \$78,438 4449 54.60 2429 407 702 49 035 1116.02 Low No 43.40 \$115,400 \$50,084 \$39,220 6762 51.88 3508 458 492 49 035 1117.01 Low No 45.76 \$115,400 \$52,807 \$41,356 5452 54.68 2981 677 1328	49	035	1113.05	Middle	No	115.82	\$115,400	\$133,656	\$104,659	3872	15.39	596	1209	1483
49 035 1115.00 Moderate No 58.89 \$115,400 \$67,959 \$53,214 2529 53.06 1342 219 400 49 035 1116.01 Middle No 86.80 \$115,400 \$100,167 \$78,438 4449 54.60 2429 407 702 49 035 1116.02 Low No 43.40 \$115,400 \$50,084 \$39,220 6762 51.88 3508 458 492 49 035 1117.01 Low No 45.76 \$115,400 \$52,807 \$41,356 5452 54.68 2981 677 1328	49	035	1113.06	Middle	No	111.47	\$115,400	\$128,636	\$100,729	2454	17.64	433	455	510
49 035 1116.01 Middle No 86.80 \$115,400 \$100,167 \$78,438 4449 54.60 2429 407 702 49 035 1116.02 Low No 43.40 \$115,400 \$50,084 \$39,220 6762 51.88 3508 458 492 49 035 1117.01 Low No 45.76 \$115,400 \$52,807 \$41,356 5452 54.68 2981 677 1328	49	035	1114.00	Moderate	No	70.60	\$115,400	\$81,472	\$63,801	6976	41.03	2862	1118	1989
49 035 1116.02 Low No 43.40 \$115,400 \$50,084 \$39,220 6762 51.88 3508 458 492 49 035 1117.01 Low No 45.76 \$115,400 \$52,807 \$41,356 5452 54.68 2981 677 1328	49	035	1115.00	Moderate	No	58.89	\$115,400	\$67,959	\$53,214	2529	53.06	1342	219	400
49 035 1117.01 Low No 45.76 \$115,400 \$52,807 \$41,356 5452 54.68 2981 677 1328	49	035	1116.01	Middle	No	86.80	\$115,400	\$100,167	\$78,438	4449	54.60	2429	407	702
	49	035	1116.02	Low	No	43.40	\$115,400	\$50,084	\$39,220	6762	51.88	3508	458	492
49 035 1117.02 Moderate No 71.87 \$115,400 \$82,938 \$64,946 4407 42.11 1856 864 1514	49	035	1117.01	Low	No	45.76	\$115,400	\$52,807	\$41,356	5452	54.68	2981	677	1328
	49	035	1117.02	Moderate	No	71.87	\$115,400	\$82,938	\$64,946	4407	42.11	1856	864	1514

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State Code	and the second se	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1118.01	Middle	No	96.07	\$115,400	\$110,865	\$86,813	5762	31.43	1811	1307	1633
49	035	1118.02	Middle	No	85.42	\$115,400	\$98,575	\$77,188	2777	25.89	719	675	1063
49	035	1119.03	Middle	No	90.49	\$115,400	\$104,425	\$81,767	4113	30.03	1235	1187	1521
49	035	1119.04	Middle	No	89.44	\$115,400	\$103,214	\$80,819	3624	25.36	919	888	910
49	035	1119.05	Moderate	No	51.58	\$115,400	\$59,523	\$46,615	3806	29.98	1141	621	858
49	035	1119.06	Moderate	No	70.95	\$115,400	\$81,876	\$64,118	4524	42.06	1903	473	631
49	035	1120.01	Moderate	No	69.98	\$115,400	\$80,757	\$63,241	3362	27.54	926	746	1028
49	035	1120.02	Middle	No	91.85	\$115,400	\$105,995	\$83,003	4871	22.81	1111	1115	1126
49	035	1121.01	Low	No	43.69	\$115,400	\$50,418	\$39,487	5058	55.04	2784	272	445
49	035	1121.02	Middle	No	95.81	\$115,400	\$110,565	\$86,582	5041	23.75	1197	1025	1174
49	035	1122.01	Middle	No	100.14	\$115,400	\$115,562	\$90,488	5018	17.46	876	1572	1701
49	035	1122.02	Middle	No	103.57	\$115,400	\$119,520	\$93,589	4005	21.52	862	1114	1498
49	035	1123.01	Middle	No	86.51	\$115,400	\$99,833	\$78,173	3815	24.40	931	938	1091
49	035	1123.02	Middle	No	99.83	\$115,400	\$115,204	\$90,208	3623	17.47	633	1049	1139
49	035	1124.02	Middle	No	83.11	\$115,400	\$95,909	\$75,100	7498	48.77	3657	1018	1874
49	035	1124.04	Moderate	No	65.35	\$115,400	\$75,414	\$59,053	4578	41.00	1877	423	635
49	035	1124.05	Moderate	No	71.69	\$115,400	\$82,730	\$64,786	6241	43.68	2726	388	746
49	035	1124.06	Moderate	No	67.73	\$115,400	\$78,160	\$61,201	3394	59.46	2018	366	548
49	035	1125.01	Middle	No	82.21	\$115,400	\$94,870	\$74,292	4027	28.09	1131	1104	1407
49	035	1125.03	Moderate	No	76.13	\$115,400	\$87,854	\$68,795	4832	31.21	1508	1465	1860
49	035	1125.04	Middle	No	93.25	\$115,400	\$107,611	\$84,263	2995	26.98	808	470	677
49	035	1125.05	Moderate	No	79.30	\$115,400	\$91,512	\$71,660	3972	29.03	1153	826	1112
49	035	1126.04	Middle	No	89.95	\$115,400	\$103,802	\$81,286	4767	20.45	975	1384	1491
49	035	1126.08	Upper	No	128.54	\$115,400	\$148,335	\$116,154	5165	15.55	803	1474	1723
49	035	1126.09	Upper	No	128.44	\$115,400	\$148,220	\$116,061	5402	14.59	788	1487	1760
49	035	1126.10	Middle	No	84.90	\$115,400	\$97,975	\$76,724	6292	31.93	2009	1392	1685
49	035	1126.11	Middle	No	115.00	\$115,400	\$132,710	\$103,922	6681	20.45	1366	1711	2089
49	035	1126.12	Middle	No	96.69	\$115,400	\$111,580	\$87,372	5440	26.32	1432	1021	1198
49		1126.13	Middle	No No	112.84	\$115,400	\$130,217	\$101,968	5264	18.56	977	1346	1446

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1126.14	Upper	No	145.86	\$115,400	\$168,322	\$131,806	3575	13.01	465	1223	1304
49	035	1126.15	Upper	No	145.25	\$115,400	\$167,619	\$131,250	2340	12.74	298	725	782
49	035	1126.16	Upper	No	133.94	\$115,400	\$154,567	\$121,033	4239	14.96	634	1215	1280
49	035	1126.17	Upper	No	166.84	\$115,400	\$192,533	\$150,757	3354	12.76	428	966	991
49	035	1126.18	Middle	No	119.53	\$115,400	\$137,938	\$108,015	3911	18.18	711	939	1078
49	035	1126.19	Upper	No	146.85	\$115,400	\$169,465	\$132,699	3111	15.81	492	960	1027
49	035	1126.20	Moderate	No	65.25	\$115,400	\$75,299	\$58,966	3206	19.15	614	978	1052
49	035	1126.21	Middle	No	93.21	\$115,400	\$107,564	\$84,226	5540	34.53	1913	1037	1274
49	035	1127.00	Moderate	No	79.34	\$115,400	\$91,558	\$71,696	5671	26.04	1477	1141	1514
49	035	1128.04	Upper	No	124.28	\$115,400	\$143,419	\$112,304	5429	17.37	943	1400	1605
49	035	1128.05	Upper	No	125.59	\$115,400	\$144,931	\$113,484	5319	19.98	1063	1347	1530
49	035	1128.12	Middle	No	95.77	\$115,400	\$110,519	\$86,544	5774	21.15	1221	1590	1821
49	035	1128.13	Upper	No	152.20	\$115,400	\$175,639	\$137,532	5410	13.01	704	1516	1603
49	035	1128.14	Upper	No	204.56	\$115,400	\$236,062	\$184,844	4960	12.32	611	1519	1719
49	035	1128.15	Upper	No	178.45	\$115,400	\$205,931	\$161,250	5126	14.77	757	1495	1561
49	035	1128.16	Upper	No	159.46	\$115,400	\$184,017	\$144,097	5906	11.41	674	1418	1576
49	035	1128.18	Unknown	No	0.00	\$115,400	\$0	\$0	3159	36.37	1149	0	0
49	035	1128.21	Upper	No	150.06	\$115,400	\$173,169	\$135,598	7038	16.20	1140	1761	2067
49	035	1128.22	Middle	No	112.96	\$115,400	\$130,356	\$102,071	5269	29.97	1579	1088	1223
49	035	1128.23	Middle	No	107.28	\$115,400	\$123,801	\$96,944	6165	23.49	1448	1319	1571
49	035	1128.24	Upper	No	121.15	\$115,400	\$139,807	\$109,477	5722	30.01	1717	645	807
49	035	1128.25	Middle	No	97.55	\$115,400	\$112,573	\$88,152	4874	30.51	1487	838	1108
49	035	1128.26	Upper	No	163.07	\$115,400	\$188,183	\$147,351	5253	9.27	487	1222	1455
49	035	1128.27	Upper	No	126.18	\$115,400	\$145,612	\$114,023	10862	21.11	2293	1699	1832
49	035	1128.28	Upper	No	183.59	\$115,400	\$211,863	\$165,900	5063	13.35	676	1278	1294
49	035	1128.29	Middle	No	80.26	\$115,400	\$92,620	\$72,528	3181	27.51	875	645	795
49	035	1128.30	Upper	No	120.46	\$115,400	\$139,011	\$108,849	5027	20.63	1037	1493	1689
49	035	1128.31	Upper	No	175.15	\$115,400	\$202,123	\$158,269	3398	24.54	834	851	1279

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD Non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1129.04	Middle	No	91.60	\$115,400	\$105,706	\$82,771	6352	42.02	2669	1540	1884
49	035	1129.05	Upper	No	124.74	\$115,400	\$143,950	\$112,722	5295	25.23	1336	1583	1715
49	035	1129.07	Middle	No	97.35	\$115,400	\$112,342	\$87,974	4705	33.24	1564	1022	1121
49	035	1129.12	Middle	No	116.72	\$115,400	\$134,695	\$105,476	2648	28.21	747	737	811
49	035	1129.13	Middle	No	104.80	\$115,400	\$120,939	\$94,700	5158	23.85	1230	1356	1486
49	035	1129.14	Middle	No	97.62	\$115,400	\$112,653	\$88,214	6548	30.70	2010	1681	2011
49	035	1129.16	Middle	No	85.15	\$115,400	\$98,263	\$76,947	4736	42.34	2005	741	1095
49	035	1129.17	Middle	No	97.87	\$115,400	\$112,942	\$88,444	4168	32.61	1359	1037	1333
49	035	1129.18	Middle	No	80.54	\$115,400	\$92,943	\$72,783	5362	38.64	2072	1068	1370
49	035	1129.20	Middle	No	92.49	\$115,400	\$106,733	\$83,575	5155	29.00	1495	1197	1405
49	035	1129.21	Middle	No	92.40	\$115,400	\$106,630	\$83,500	4280	28.39	1215	968	1107
49	035	1130.07	Middle	No	118.41	\$115,400	\$136,645	\$107,000	4947	17.59	870	1336	1361
49	035	1130.08	Upper	No	145.00	\$115,400	\$167,330	\$131,028	6285	15.99	1005	1820	1868
49	035	1130.10	Upper	No	141.50	\$115,400	\$163,291	\$127,860	7371	13.53	997	1998	2063
49	035	1130.11	Upper	No	137.83	\$115,400	\$159,056	\$124,549	6567	17.63	1158	1634	1789
49	035	1130.12	Upper	No	141.84	\$115,400	\$163,683	\$128,173	5837	16.52	964	1860	1967
49	035	1130.13	Upper	No	134.05	\$115,400	\$154,694	\$121,133	6130	14.16	868	1364	1428
49	035	1130.14	Middle	No	105.13	\$115,400	\$121,320	\$95,000	5273	15.32	808	1619	1690
49	035	1130.16	Upper	No	159.54	\$115,400	\$184,109	\$144,167	7420	14.31	1062	1658	1754
49	035	1130.17	Middle	No	104.33	\$115,400	\$120,397	\$94,280	7279	13.68	996	1686	2203
49	035	1130.21	Middle	No	108.26	\$115,400	\$124,932	\$97,829	5887	30.75	1810	1632	1699
49	035	1130.22	Upper	No	149.30	\$115,400	\$172,292	\$134,911	7589	20.45	1552	1779	2096
49	035	1130.23	Middle	No	114.97	\$115,400	\$132,675	\$103,890	6756	22.88	1546	1674	1762
49	035	1130.24	Upper	No	142.68	\$115,400	\$164,653	\$128,929	5388	17.22	928	1156	1156
49	035	1130.25	Middle	No	116.87	\$115,400	\$134,868	\$105,605	5320	26.77	1424	1057	1198
49	035	1131.01	Middle	No	99.14	\$115,400	\$114,408	\$89,583	7013	33.18	2327	1846	2167
49	035	1131.02	Middle	No	118.11	\$115,400	\$136,299	\$106,728	3766	20.69	779	1105	1143
49	035	1131.05	Upper	No	123.58	\$115,400	\$142,611	\$111,667	7886	14.58	1150	1590	1834
49	035	1131.08	Upper	No	120.19	\$115,400	\$138,699	\$108,611	4035	26.25	1059	986	1174

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1131.09	Upper	No	144.18	\$115,400	\$166,384	\$130,283	4823	16.79	810	1183	1387
49	035	1131.10	Middle	No	107.00	\$115,400	\$123,478	\$96,686	4399	14.87	654	1142	1231
49	035	1131.11	Upper	No	144.03	\$115,400	\$166,211	\$130,153	5210	17.41	907	1025	1106
49	035	1131.12	Upper	No	121.65	\$115,400	\$140,384	\$109,930	3726	15.03	560	1000	1000
49	035	1131.13	Middle	No	97.56	\$115,400	\$112,584	\$88,162	11122	28.72	3194	1836	2014
49	035	1131.14	Middle	No	83.70	\$115,400	\$96,590	\$75,637	9861	28.29	2790	1286	1509
49	035	1133.07	Moderate	No	68.73	\$115,400	\$79,314	\$62,109	7413	72.99	5411	1314	1802
49	035	1133.08	Moderate	No	63.33	\$115,400	\$73,083	\$57,226	5196	66.34	3447	702	1340
49	035	1133.09	Moderate	No	77.19	\$115,400	\$89,077	\$69,754	5111	55.06	2814	983	1265
49	035	1133.10	Moderate	No	62.65	\$115,400	\$72,298	\$56,613	3143	49.95	1570	517	780
49	035	1133.11	Moderate	No	50.76	\$115,400	\$58,577	\$45,871	4900	60.47	2963	739	1336
49	035	1133.12	Low	No	38.73	\$115,400	\$44,694	\$35,000	3859	69.78	2693	339	682
49	035	1133.13	Moderate	No	60.26	\$115,400	\$69,540	\$54,453	3993	58.18	2323	326	477
49	035	1133.14	Moderate	No	59.45	\$115,400	\$68,605	\$53,726	2821	66.71	1882	360	453
49	035	1134.06	Moderate	No	57.23	\$115,400	\$66,043	\$51,719	6787	68.48	4648	936	1448
49	035	1134.08	Middle	No	81.05	\$115,400	\$93,532	\$73,241	7119	47.56	3386	1328	1632
49	035	1134.09	Middle	No	93.20	\$115,400	\$107,553	\$84,219	5049	45.04	2274	1315	1479
49	035	1134.10	Middle	No	80.73	\$115,400	\$93,162	\$72,955	6805	50.99	3470	1264	1646
49	035	1134.11	Middle	No	86.59	\$115,400	\$99,925	\$78,250	2808	51.92	1458	686	726
49	035	1134.12	Middle	No	99.52	\$115,400	\$114,846	\$89,934	3018	59.38	1792	600	705
49	035	1134.13	Middle	No	86.59	\$115,400	\$99,925	\$78,250	5980	40.70	2434	1252	1539
49	035	1134.14	Middle	No	107.44	\$115,400	\$123,986	\$97,083	6530	49.33	3221	1407	1610
49	035	1134.15	Middle	No	93.15	\$115,400	\$107,495	\$84,175	5951	57.82	3441	1372	1400
49	035	1135.05	Moderate	No	76.74	\$115,400	\$88,558	\$69,350	6558	46.84	3072	1396	1871
49	035	1135.09	Moderate	No	70.51	\$115,400	\$81,369	\$63,720	7826	70.94	5552	1232	1769
49	035	1135.10	Middle	No	96.17	\$115,400	\$110,980	\$86,902	3357	41.23	1384	1010	1049
49	035	1135.11	Moderate	No	71.93	\$115,400	\$83,007	\$65,000	3900	39.90	1556	901	1028
49	035	1135.12	Moderate	No	70.08	\$115,400	\$80,872	\$63,333	3417	42.11	1439	403	600

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1135.13	Middle	No	80.08	\$115,400	\$92,412	\$72,364	6186	42.84	2650	1078	1298
49	035	1135.14	Moderate	No	61.55	\$115,400	\$71,029	\$55,625	6757	56.45	3814	821	1561
49	035	1135.15	Middle	No	82.92	\$115,400	\$95,690	\$74,933	6168	28.31	1746	1660	1968
49	035	1135.20	Middle	No	81.49	\$115,400	\$94,039	\$73,641	4101	44.75	1835	920	1180
49	035	1135.21	Moderate	No	77.32	\$115,400	\$89,227	\$69,868	6493	42.05	2730	1580	1891
49	035	1135.22	Middle	No	104.32	\$115,400	\$120,385	\$94,271	3281	30.87	1013	1003	1039
49	035	1135.23	Moderate	No	72.14	\$115,400	\$83,250	\$65,188	6102	42.04	2565	1498	1865
49	035	1135.26	Middle	No	84.29	\$115,400	\$97,271	\$76,167	5793	47.61	2758	1267	1416
49	035	1135.27	Middle	No	84.38	\$115,400	\$97,375	\$76,250	4241	43.22	1833	1152	1241
49	035	1135.28	Middle	No	95.67	\$115,400	\$110,403	\$86,454	4976	38.75	1928	1498	1578
49	035	1135.32	Middle	No	105.36	\$115,400	\$121,585	\$95,208	3259	28.14	917	859	968
49	035	1135.33	Middle	No	104.81	\$115,400	\$120,951	\$94,712	4918	23.65	1163	1257	1428
49	035	1135.36	Moderate	No	69.61	\$115,400	\$80,330	\$62,900	4201	62.08	2608	516	1133
49	035	1135.37	Middle	No	103.19	\$115,400	\$119,081	\$93,250	3699	43.74	1618	829	1030
49	035	1135.38	Middle	No	85.53	\$115,400	\$98,702	\$77,292	3105	53.69	1667	680	746
49	035	1135.39	Middle	No	94.24	\$115,400	\$108,753	\$85,156	4883	54.70	2671	965	1087
49	035	1135.40	Middle	No	102.06	\$115,400	\$117,777	\$92,222	5367	39.56	2123	1462	1532
49	035	1135.41	Middle	No	111.65	\$115,400	\$128,844	\$100,893	2545	43.34	1103	521	569
49	035	1135.42	Middle	No	105.23	\$115,400	\$121,435	\$95,093	4018	39.37	1582	906	980
49	035	1135.43	Middle	No	119.33	\$115,400	\$137,707	\$107,832	4478	23.05	1032	1154	1202
49	035	1135.44	Middle	No	108.57	\$115,400	\$125,290	\$98,107	4050	53.98	2186	959	1035
49	035	1135.45	Middle	No	118.46	\$115,400	\$136,703	\$107,045	3791	65.34	2477	739	816
49	035	1136.00	Moderate	No	65.21	\$115,400	\$75,252	\$58,924	5498	53.49	2941	1382	1652
49	035	1137.01	Middle	No	86.55	\$115,400	\$99,879	\$78,207	4160	47.52	1977	1008	1143
49	035	1137.02	Moderate	No	67.82	\$115,400	\$78,264	\$61,288	2619	46.35	1214	625	830
49	035	1138.01	Moderate	No	75.43	\$115,400	\$87,046	\$68,167	5939	55.04	3269	1235	1563
49	035	1138.02	Moderate	No	62.77	\$115,400	\$72,437	\$56,719	4371	60.44	2642	968	1177
49	035	1138.04	Middle	No	102.58	\$115,400	\$118,377	\$92,694	4809	54.96	2643	1299	1404
49	035	1138.05	Middle	No	108.54	\$115,400	\$125,255	\$98,083	4178	52.01	2173	663	926

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State Code	Contraction of the second s	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
49	035	1139.03	Middle	No	100.13	\$115,400	\$115,550	\$90,478	5403	43.35	2342	1311	1610
49	035	1139.04	Middle	No	86.75	\$115,400	\$100,110	\$78,395	6039	42.89	2590	1594	1720
49	035	1139.05	Moderate	No	78.27	\$115,400	\$90,324	\$70,725	7667	48.26	3700	1615	1819
49	035	1139.06	Moderate	No	63.30	\$115,400	\$73,048	\$57,200	4888	37.11	1814	716	1200
49	035	1139.08	Moderate	No	75.70	\$115,400	\$87,358	\$68,409	5272	45.18	2382	1213	1422
49	035	1139.09	Upper	No	127.26	\$115,400	\$146,858	\$115,000	4119	29.89	1231	938	1002
49	035	1140.00	Middle	No	104.44	\$115,400	\$120,524	\$94,375	4344	32.07	1393	628	186
49	035	1141.00	Upper	No	130.17	\$115,400	\$150,216	\$117,625	3582	17.67	633	649	959
49	035	1142.00	Middle	No	114.81	\$115,400	\$132,491	\$103,750	5161	27.94	1442	1392	1567
49	035	1143.01	Moderate	No	56.82	\$115,400	\$65,570	\$51,343	5511	49.14	2708	849	925
49	035	1143.02	Middle	No	105.17	\$115,400	\$121,366	\$95,040	2833	30.04	851	657	816
49	035	1143.03	Upper	No	137.50	\$115,400	\$158,675	\$124,250	10724	31.65	3394	1970	2070
49	035	1143.04	Middle	No	99.78	\$115,400	\$115,146	\$90,168	5801	33.87	1965	1068	1180
49	035	1145.00	Middle	No	85.32	\$115,400	\$98,459	\$77,100	7487	61.99	4641	1245	1732
49	035	1146.01	Upper	No	134.00	\$115,400	\$154,636	\$121,083	5315	14.41	766	1469	1585
49	035	1146.02	Upper	No	152.69	\$115,400	\$176,204	\$137,979	2083	9.60	200	658	705
49	035	1147.00	Moderate	No	74.26	\$115,400	\$85,696	\$67,107	4620	53.23	2459	1373	1597
49	035	1148.00	Upper	No	276.67	\$115,400	\$319,277	\$250,001	3654	15.49	566	1294	1318
49	035	1151.07	Upper	No	150.74	\$115,400	\$173,954	\$136,211	6431	13.98	899	1350	1470
49	035	1151.08	Middle	No	110.79	\$115,400	\$127,852	\$100,110	8083	20.59	1664	2043	2258
49	035	1151.09	Middle	No	83.26	\$115,400	\$96,082	\$75,234	7272	29.50	2145	904	938
49	035	1152.10	Upper	No	149.42	\$115,400	\$172,431	\$135,024	8274	20.32	1681	1756	1929
49	035	1152.11	Middle	No	107.82	\$115,400	\$124,424	\$97,432	7033	29.72	2090	913	1003
49	035	9800.00	Unknown	No	0.00	\$115,400	\$0	\$0	16	31.25	5	0	0
49	035	9801.00	Unknown	No	0.00	\$115,400	\$0	\$0	10	30.00	3	0	0

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Loan to Deposit

Loan to Deposit Ratio

Ratio



Holladay Bank & Trust Loan to Deposit Ratio

	Total Deposits	Total Loans	Percentage
30-Sep-24	\$52,727	\$41,732	79.15%
30-Jun-24	\$49,841	\$41,248	82.76%
31-Mar-24	\$50,962	\$43,016	84.41%
31-Dec-24	\$50,030	\$47,953	95.85%

Reported in Thousands

Public Section



PUBLIC DISCLOSURE

September 8, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Holladay Bank & Trust Certificate Number: 21448

2020 East 4800 South Street Salt Lake City, Utah 84117-5171

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

25 Jessie Street at Ecker Square, Suite 2300 San Francisco, California 94105

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

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INSTITUTION RATING

INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING: This institution is rated <u>Satisfactory.</u>

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The following points summarize the institution's CRA performance:

- The average net loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and AA credit needs.
- A majority of the bank's small business and home mortgage loans were originated within the bank's AA.
- The geographic distribution of small business and home mortgage loans reflects reasonable dispersion throughout the AA.
- The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and borrowers of different income levels.
- The institution did not receive any CRA-related complaints during the evaluation period; therefore, this factor did not affect the overall CRA Rating.

DESCRIPTION OF INSTITUTION

Holladay Bank & Trust (HBT) is a full-service, family owned community bank headquartered in Salt Lake City, Utah. The bank received a Satisfactory rating using Interagency Small Institution Examination Procedures at the previous FDIC CRA Performance Evaluation, dated March 2, 2015. HBT's sole office is located in Salt Lake County, within a middle-income census tract (CT).

HBT offers traditional deposit products and services including consumer and business checking, savings, money market accounts, and certificates of deposit. Available consumer and commercial loan products include the following: home equity and revolving lines of credit; residential and commercial construction loans; loans to purchase automobiles, boats, recreational vehicles, and other consumer purposes; term loans; mini-perm loans; and Small Business Administration (SBA) 504 program loans. Other products and services include debit cards, credit cards, cashier's checks, money orders, safe deposit boxes, wire transfers, official checks, night depository, and coin counting. The bank operates one automated teller machine, located at the branch, and alternative banking services include online banking, telephone banking, mobile banking, mail banking, and remote deposit capture. No branches have been opened or closed and there has been no merger or acquisition activity since the previous evaluation.

As of the June 30, 2020 Consolidated Reports of Condition and Income (Call Report), assets totaled \$67.5 million and deposits totaled \$56.9 million. These figures represent a 20.7 percent increase in total assets and a 23.8 percent increase in total deposits since the previous evaluation, which used the bank's December 31, 2014 Call Report information. The size and composition of the loan portfolio has changed since the previous evaluation. Loans net of uncarned income increased 25.1 percent from \$35.9 million to \$44.8 million. The bank's primary lending product is commercial loans (commercial, industrial, and commercial real estate), which comprise 47.7 percent of the bank's total loan portfolio. The next largest categories are residential real estate followed by construction, which represent 31.8 and 18.0 percent of the loan portfolio, respectively. At the previous evaluation, the loan portfolio was primarily composed of residential real estate loans (44.1 percent), followed by commercial (29.6 percent), and construction loans (20.8 percent).

Loan Portfolio Distribution as of 6/	Loan Portfolio Distribution as of 6/30/2020									
Loan Category	\$(000s)	%								
Construction, Land Development, and Other Land Loans	8,078	18.0								
Secured by Farmland	0	0.0								
Secured by 1-4 Family Residential Properties	10,309	23.0								
Secured by Multifamily (5 or more) Residential Properties	3,952	8.8								
Secured by Nonfarm Nonresidential Properties	12,338	27.5								
Total Real Estate Loans	34,677	77.3								
Commercial and Industrial Loans	9,041	20.2								
Agricultural Production and Other Loans to Farmers	0	0.0								
Consumer Loans	1,782	4.0								
Other Loans	0	0.0								
Less: Unearned Income	654	1.5								
Total Loans	44,846	100.0								
Source: June 30, 2020 Call Report										

HBT is owned by numerous individuals and institutional shareholders, and there is neither a holding company nor any affiliates. There are no financial, legal, or other impediments that would limit the bank's ability to meet the credit needs of its AA.

DESCRIPTION OF ASSESSMENT AREA

HBT has defined its AA as the entirety of Salt Lake County, which is located along the Wasatch Mountain front and part of the Salt Lake City Metropolitan Statistical Area (MSA) #41620. The AA has changed since the previous evaluation, where the bank elected to be assessed for the whole of the Salt Lake City MSA. Salt Lake County is representative of the bank's physical presence, marketing efforts, and geographic area served. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income income geographies.

To establish the bank's performance context, examiners relied on bank records, public financial information, demographic data from the 2015 American Community Survey (ACS), D&B, and information obtained from two community contacts.

Economic and Demographic Data

The AA consists of 212 CTs: 7 low-, 51 moderate-, 86 middle-, 65 upper-income, and 3 CTs where income information was not available. There are no distressed or underserved non-metropolitan middle-income CTs within the AA. The following table shows select demographic, housing, and business information of the AA:

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	212	3.3	24.1	40.6	30.7	1.4
Population by Geography	1,078,958	3.2	22.8	43.1	30.0	0.9
Housing Units by Geography	372,990	3.1	24.3	42.6	29.2	0.7
Owner-Occupied Units by Geography	233,092	1.5	17.5	44.9	35.6	0.5
Occupied Rental Units by Geography	118,800	6.4	36.9	39.4	16.1	1.2
Vacant Units by Geography	21,098	2.3	28.9	35.3	33.3	0.2
Businesses by Geography	109,968	2.9	21.2	39.3	35.8	0.9
Farms by Geography	1,703	2.2	19.8	40.2	37.3	0.4
Family Distribution by Income Level	247,693	19.9	17.6	22.0	40.5	0.0
Household Distribution by Income Level	351,892	22.3	16.6	20.4	40.6	0.0
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$71,849	Median Housi	ng Value		\$247,942
			Median Gross	Rent		\$966
			Families Belo	w Poverty Le	evel	9.2%

(*) The NA category consists of geographies that have not been assigned an income classification.

Services represent the largest industry in the AA at 38.6 percent of businesses. This is followed by non-classified establishments (21.3 percent); finance, insurance, and real estate (12.5 percent); and retail trade (9.6 percent). The top employers in the Salt Lake City MSA are the University of Utah, Intermountain Health Care Inc., Walmart Inc., Delta Airlines, and Smith's Food & Drug.

According to information from Moody's Analytics, prior to the onset of the global COVID-19 pandemic, the Salt Lake City MSA was experiencing a strong local economy, with one of the nation's fastest rates of job growth and low unemployment. The MSA has been a popular location for corporate expansions and relocations due to its young and well-educated workforce, below-average business costs, and business-friendly environment. A heightened presence of banking and other financial sector jobs has helped to drive employment growth. The average annual unemployment rate of the AA remained consistently below the State of Utah and national averages from 2015 through 2019. Population growth and in-migration has helped to fuel above-average gains in healthcare and construction. Housing prices experienced steady appreciation over the review period; home sales increased and single- and multifamily constructions remained elevated.

The drop in economic activity in response to the global COVID-19 pandemic resulted in large-scale layoffs and business closures, especially in consumer-dependent industries. Retail and leisure/hospitality together employ one in five Utah workers and account for one-tenth of the state's output. Both industries were impacted by the pandemic, and while retail has rebounded quickly,

leisure/hospitality has recouped only about 40 percent of jobs lost. While the state did not avoid the economic downturn that the nation as a whole has faced since the outbreak of COVID-19, Utah's diverse economy, low exposure to the pandemic, and relaxed approach to dealing with the virus resulted in businesses taking a milder hit than other areas of the country. Utah has an above-average share of white-collar workers who can work remotely and were less likely to be laid off. Manufacturing and construction were considered essential services and experienced a relatively small impact at the peak of the pandemic. Utah's jobless rate in June was the second lowest rate in the country. A positive factor for the local economic forecast is that the Salt Lake City MSA continues to present an attractive alternative to Silicon Valley for the tech and finance industries, with relatively low business costs and a deep talent pool. However, as the state's capital, Salt Lake City's exposure to public sector weakness and reduced tax revenues may result in lost jobs and slashed fiscal budgets. In addition, tourism may continue to experience a decline as consumers worried about contracting the virus reduce travel to mitigate risk.

Competition

Competition for banking services and lending is very strong in the AA. According to the June 30, 2020 FDIC Deposit Market Share Report, 41 financial institutions operate 209 offices within the area and share \$684.6 billion in deposits. A number of large industrial and commercial banks operate in the area; the five most prominent financial institutions are Morgan Stanley Bank, Ally Bank, American Express National Bank, UBS Bank, Synchrony Bank, which share 73.1 percent of AA deposits. HBT operates one branch location that maintains a deposit share representing 0.01 percent of the AA's total deposits; the bank ranks 34th in the AA based on deposit market share.

Community Contact(s)

Examiners reviewed two existing community contacts with organizations serving Salt Lake County to help identify credit needs in the AA. One organization provides assistance and financing to small businesses, the other organization focuses on revitalizing neighborhoods and creating affordable housing, as well as homeowner education and foreclosure prevention services.

The small business contact stated that there is a lot of opportunity for financial institutions to participate in programs to assist businesses affected by the economic impact of COVID-19, such as the SBA's Economic Injury Disaster Loan program. The contact further indicated that this credit need is more pressing in rural areas of Utah than around the highly populous, well-served area surrounding Salt Lake City.

The affordable housing contact remarked on the impact of COVID-19 on local communities, with many individuals losing jobs as small businesses reduced staff or shut down. According to the contact, 18,000 affordable housing units are under construction in the area and an additional 15,000 more units are needed. The contact noted the high degree of competition for community development opportunities in the Salt Lake City area.

Credit Needs

Considering area demographics, economic data, and conversations with bank management and community contacts, examiners determined that small business lending and affordable housing are the most significant credit needs in the AA.

SCOPE OF EVALUATION

General Information

Examiners used Interagency Small Institution Examination Procedures to evaluate HBT's CRA performance. This evaluation covers the period from the previous evaluation, dated March 2, 2015, to the current evaluation dated September 8, 2020.

Activities Reviewed

Examiners determined that the bank's major product lines are small business and home mortgage loans. This conclusion is based on the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. The bank's record of originating small business loans carries more weight to the overall conclusion because it is the bank's primary product and home mortgage loans are provided in an accommodation basis. Examiners did not analyze other loan types, such as small farm or consumer loans, as they did not represent major product lines and would not provide material support for conclusions or ratings.

Bank records indicate that the lending focus and product mix remained consistent throughout the evaluation period. Loans originated or renewed between January 1, 2019, and December 31, 2019, are representative of the bank's lending performance over the entire evaluation period. In 2019, the bank originated 17 small business loans totaling \$3.4 million and 9 home mortgage loans totaling \$1.9 million. Examiners analyzed the entire universe of small business and home mortgage loans originated in 2019 for this evaluation. The bank's lending performance is compared to 2019 D&B business demographic data and 2015 ACS population and housing data.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

HBT's Lending Test performance is satisfactory. Additional performance context considerations were made in evaluating the bank's lending performance, which are discussed in further detail below.

Loan-to-Deposit Ratio

HBT's average net LTD ratio is reasonable given the institution's size, financial condition, competition, and AA credit needs. The bank's net LTD ratio, calculated from Call Report data, averaged 75.1 percent over the previous 22 calendar quarters from March 31, 2015, through June 30, 2020. HBT's performance is consistent with a comparable financial institution that was selected based on location, asset size, and loan portfolio concentration.

· · · · · · · · · · · · · · · · · · ·	Total Assets as of 6/30/2020 (\$000s)	Average Net LTD Ratio (%)	
Holladay Bank & Trust	67,504	75.1	
Similarly-Situated Institution	115,169	75.6	

The bank's net LTD ratio remained generally stable over the evaluation period, and ranged from a low of 62.3 percent on June 30, 2015, to a high of 85.3 percent on December 31, 2017. Net loans to deposits as a measure of lending activity is consistent with the previous evaluation where the average net LTD ratio was 70.5 percent.

Assessment Area Concentration

HBT originated a majority of home mortgage and small business loans, by number and dollar volume, within its AA.

		Le	nding I	nside and	l Outside	of the Asse	essment Ar	ea			
		Number	of Loar	15		Dolla					
Loan Category	Ir	iside	Outside		Total	In	Inside		tside	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Home Mortgage											
2019	8	88.9	1	11.1	9	1,448	74.5	496	25.5	1,944	
Subtotal	8	88.9	1	11.1	9	1,448	74.5	496	25.5	1,944	
Small Business											
2019	10	58.8	7	41.2	17	1,834	54.3	1,542	45.7	3,376	
Subtotal	10	58.8	7	42.2	17	1,834	54.3	1,542	45.7	3,376	
Total	18	69.2	8	30.8	26	3,282	61.7	2,038	38.3	5,320	
Source: January 1, 201 Due to rounding, totals				Data				•			

Geographic Distribution

Overall, HBT's geographic distribution of small business and home mortgage loans reflects reasonable dispersion throughout the AA. This conclusion is supported by reasonable performance in both small business and home mortgage lending. Examiners focused on the percentage of loans by number originated in the AA's low- and moderate-income CTs.

Small Business Loans

The bank's geographic distribution of small business loans reflects reasonable dispersion when considering the demographic characteristics of the AA. The bank's small business lending performance is compared to the percentage of businesses located within the AA based on 2019 D&B data.

Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	2.9	0	0.0	0	0.0
Moderate	21.2	3	30.0	362	19.7
Middle	39.3	3	30.0	1,061	57.9
Upper	35.8	4	40.0	411	22.4
Not Available	0.9	0	0.0	0	0.0
Totals	100.0	10	100.0	1,834	100.0

While the bank did not make any loans to small businesses located in low-income CTs in 2019, consideration is given to the AA's geography. HBT operates one branch that is located in a middle-income CT; the surrounding CTs are middle- and upper-income. Based on the 2015 ACS demographic data, only 7 of the 212 CTs in the AA (3.3 percent) are classified as low-income, and the CTs are relatively distant from the bank's physical presence. Furthermore, the high presence of competing banks and credit unions in Salt Lake City further limits the number of new businesses that may seek out loans from HBT.

HBT's small business lending to moderate-income CTs significantly exceeds the percent of businesses located in moderate-income CTs.

Overall, HBT's small business lending in low- to moderate-income CTs reflects reasonable dispersion.

Home Mortgage Loans

The bank's geographic distribution of home mortgage loans reflects reasonable dispersion when considering the demographic characteristics of the AA. The bank's home mortgage lending performance is compared to the percentage of owner-occupied housing units located within the AA based on 2015 ACS data.

Tract Income Level	% of Owner- Occupied Housing Units	#	%	\$(000s)	%
Low	1.5	0	0.0	0	0.0
Moderate	17.5	3	37.5	390	26.9
Middle	44.9	4	50.0	993	68.6
Upper	35.6	1	12.5	65	4.5
Not Available	0.5	0	0.0	0	0.0
Total	100.0	8	100.0	1,448	100.0

Similar to the geographic distribution of small business loans, in 2019 the bank did not originate any home mortgage loans in low-income CTs. As previously discussed, the geographic characteristics of the AA combined with the high presence of competing banks and credit unions in Salt Lake City, pose challenges to the bank as a single-location institution.

The percentage of HBT's home mortgage loans in moderate-income CTs significantly exceeds the percent of owner-occupied housing units located in moderate-income CTs, reflecting good responsiveness to AA affordable housing credit needs.

Overall, HBT's home mortgage lending in low- and moderate-income CTs, reflects reasonable dispersion.

Borrower Profile

HBT's distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and individuals of different income levels. This conclusion is supported by reasonable performance in both small business and home mortgage lending.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. Examiners focused on loans originated in the AA to businesses with gross annual revenues (GARs) of \$1 million or less.

Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	87.3	5	50.0	621	33.9
>1,000,000	4.7	4	40.0	1,175	64.1
Revenue Not Available	8.0	1	10.0	38	2.1
Total	100.0	10	100.0	1,834	100.0

HBT's distribution of loans to small businesses as a percentage of number of loans is below 2019 D&B data. However, while D&B data is used as a comparative factor for small business lending performance, D&B data includes all businesses in a given area that voluntarily respond to a revenue survey request. The survey data includes a number of very small operations that have limited or no credit needs. As such, D&B data is primarily an indicator of demographics in a given area. In addition, the bank's market share is very small, reflecting the highly competitive Salt Lake City operating environment. Examiners reviewed the bank's small business lending in 2017 and 2018 to assess the bank's borrower profile trend for the review period. The distribution of loans to small businesses was 81.8 percent in 2017 and 100.0 percent in 2018. While HBT's borrower profile rating declined in 2019, the bank's distribution of small business loans for this evaluation period is relatively comparable to the previous evaluation, where the institution's borrower profile rating was 70.0 percent in 2013 and 50.0 percent in 2014.

Considering these factors, the overall penetration of loans to businesses of different revenue sizes is reasonable.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among retail customers of different income levels. Examiners focused on home mortgage loans originated in the AA to lowand moderate-income individuals.

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	19.9	0	0.0	0	0.0
Moderate	17.6	1	12.5	65	4.5
Middle	22.0	1	12.5	70	4.8
Upper	40.5	2	25.0	328	22.7
Not Available	0.0	4	50.0	985	68.0
Total	100.0	8	100.0	1,448	100.0

HBT's distribution of home mortgage loans as a percentage of number of loans is below the distribution of families in the low- and moderate-income borrower categories.

Examiners considered the bank's business strategy and market competition. HBT generally only originates residential mortgage loans as an accommodation to existing customers and bank management does not actively seek out these types of credits. In addition, HBT does not sell its home mortgage loans on the secondary market, and the bank is not able to price its loans as competitively as a result. Per HBT policy, the loan-to-value (LTV) ratio on residential mortgage loans is limited to 80.0 percent, and the bank does not participate in federally backed mortgage programs that permit higher LTVs and lower down payments. As such, the bank's pool of low- and moderate-income applicants for traditional mortgages is more limited than other financial institutions that can price such loans more competitively. Considering these performance context factors, the institution's home mortgage lending to low- and moderate-income families is reasonable.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with laws relating to discrimination and other illegal credit practices were reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any evidence of discriminatory or other illegal practices; therefore, this consideration did not affect the institution's overall CRA rating.

APPENDICES

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:

- 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).

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.

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.

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.

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.

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 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.

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.

Annual Disclosure

Statement

<u>Annual Disclosure Statement</u> - The Federal Deposit Insurance Corporation requires FDIC-insured State-Chartered Banks that are not members of the Federal Reserve System to prepare, and make available on request, annual disclosure statements of the bank's financial condition. This statement shows the bank's financial condition at the end of the most recent year and the preceding year. For a free copy of this statement contact: Holladay Bank & Trust, P.O. Box 17576, Holladay, UT 84117. P: 801-272-4275