

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION
BY FEDERAL DEPOSIT INSURANCE CORPORATION
PUBLIC SECTION

PUBLIC DISCLOSURE

February 5, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Bank of Union
Certificate Number: 14334

15 East Main Street
Union, Missouri 63084

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

1100 Walnut Street, Suite 2100
Kansas City, Missouri 64106

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

TABLE OF CONTENTS

INSTITUTION RATING	1
DESCRIPTION OF INSTITUTION	2
DESCRIPTION OF ASSESSMENT AREA.....	3
SCOPE OF EVALUATION.....	5
CONCLUSIONS ON PERFORMANCE CRITERIA.....	6
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	13
APPENDICES	14
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA.....	14
GLOSSARY	15

INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The institution originated a majority of small business and home mortgage loans in its assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels.
- The institution did not receive any CRA-related complaints since the previous CRA evaluation performed as of March 8, 2021.

The Community Development Test is rated Satisfactory.

- The institution demonstrated adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities.

DESCRIPTION OF INSTITUTION

United Bank of Union is a full-service commercial bank headquartered in Union, Missouri. The bank is wholly owned by Cardinal Bancorp II, Inc., a one-bank holding company, located in Washington, Missouri. The bank is affiliated through common ownership with CNB St. Louis Bank, Maplewood, Missouri, and Bank of Washington, Washington, Missouri. No merger or acquisition activities have occurred since the prior evaluation. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation dated March 8, 2021, which utilized Intermediate Small Institution Examination Procedures.

In addition to the main office, the bank continues to operate two full-service branches in Union. Management also operates a deposit-taking ATM at each office and one cash-dispensing ATM at a convenience store in Beaufort, Missouri. All branches and ATMs are located in Franklin County, which is in the western portion of the St. Louis, Missouri-Illinois Metropolitan Statistical Area (MSA).

The bank's primary business focus continues to be commercial lending, and to a lesser extent, residential lending. The bank also originates and sells residential real estate loans on the secondary market. Additionally, the bank offers Small Business Administration (SBA) loans. Agricultural, construction, and consumer loans are also offered. The institution offers a variety of deposit services including checking accounts, savings accounts, money market deposit accounts, and certificates of deposit for consumers and businesses. Alternative banking services include internet and mobile banking and electronic bill pay.

According to the Consolidated Reports of Condition and Income (Call Report) as of September 30, 2023, total assets equaled \$534.4 million and included total loans of \$415.4 million and total securities of \$78.6 million. Total deposits equaled \$453.0 million. These figures have all increased since the prior evaluation when total assets equaled \$424.8 million, total loans equaled \$313.9 million, total securities equaled \$76.7 million, and total deposits equaled \$348.2 million. As illustrated in the following table, commercial lending represents 55.2 percent of the loan portfolio, followed by residential lending at 27.2 percent.

Loan Portfolio Distribution as of 09/30/2023		
Loan Category	\$ (000s)	%
Construction and Land Development	62,429	15.0
Secured by Farmland	5,081	1.2
1-4 Family Residential	89,904	21.6
Multi-family (5 or more) Residential	23,208	5.6
Commercial Real Estate	139,387	33.6
Total Real Estate Loans	320,009	77.0
Commercial and Industrial	89,905	21.6
Agricultural	271	0.1
Consumer	4,688	1.1
Obligations of States and Political Subdivisions in the U.S.	0	0.0
Other	0	0.0
Lease Financing Receivables	495	0.1
Total Loans	415,368	100.0

*Source: Reports of Condition and Income
Due to rounding, totals may not equal 100.0%*

Examiners did not identify any financial, legal, or other impediments affecting the bank's ability to meet the assessment area's credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA regulation requires financial institutions to define one or more assessment areas within which its CRA performance will be evaluated. United Bank of Union has designated one assessment area comprised of Franklin County, within the St. Louis, Missouri-Illinois MSA. While the boundaries of the assessment area have not changed since the prior evaluation, the number of census tracts that comprise the assessment area increased from 17 to 28. This increase was due to population growth and commercial development in the area prior to the 2020 U.S. Census. Based on 2020 U.S. Census data, the assessment area consists of 7 moderate-income, 18 middle-income, and 3 upper-income census tracts.

Economic and Demographic Data

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographics (Census Tracts)	28	0.0	25.0	64.3	10.7
Population by Geography	104,682	0.0	25.6	67.8	6.6
Housing Units by Geography	45,507	0.0	26.9	66.9	6.2
Owner-Occupied Units by Geography	31,765	0.0	21.7	71.4	6.9
Occupied Rental Units by Geography	9,362	0.0	42.9	53.5	3.7
Vacant Units by Geography	4,380	0.0	30.2	63.5	6.3
Businesses by Geography	14,263	0.0	29.8	62.3	7.9
Farms by Geography	916	0.0	23.1	68.6	8.3
Family Distribution by Income Level	28,149	22.3	22.0	25.4	30.4
Household Distribution by Income Level	41,127	24.4	18.7	19.0	37.9
Median Family Income - St. Louis, MO-IL MSA	\$84,758	Median Housing Value		\$176,821	
Families Below Poverty Level	6.9%	Median Gross Rent		\$765	

*Source: 2020 U.S. Census and 2023 D&B Data
Due to rounding, totals may not equal 100.0%*

The FFIEC-updated median family incomes for the St. Louis, Missouri-Illinois MSA were used to analyze home mortgage lending performance under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table.

Median Family Income Ranges in the St. Louis, MO-IL MSA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2020 (\$82,600)	<\$41,300	\$41,300 to <\$66,080	\$66,080 to <\$99,120	≥\$99,120
2021 (\$84,700)	<\$42,350	\$42,350 to <\$67,760	\$67,760 to <\$101,640	≥\$101,640
2022 (\$96,800)	<\$48,400	\$48,400 to <\$77,440	\$77,440 to <\$116,160	≥\$116,160

Source: FFIEC

Competition

United Bank of Union operates in a competitive market for credit products and financial services given the assessment area's size. According to FDIC Deposit Market Share data as of June 30, 2023, there were 16 financial institutions operating 41 offices within Franklin County. These institutions range from small community banks to large, regional institutions. United Bank of Union ranked third with 12.7 percent of the deposit market share.

The bank is not required to collect or report small business lending data, but is required collect and report home mortgage lending data pursuant to the Home Mortgage Disclosure Act (HMDA). Aggregate lending data serves as a useful indicator of loan demand and competition for home

mortgage and small business loans. Aggregate small business lending data for 2022, the most recent data available, revealed that 65 lenders reported 2,261 loans in Franklin County. Aggregate home mortgage lending data for 2022 revealed that 246 lenders reported 4,661 loans in Franklin County. Of these lenders, United Bank of Union ranked third with a market share of 4.8 percent for home mortgage loans. These levels of activity indicate a high degree of competition for home mortgage and small business loans, given the size of the assessment area.

Community Contact

Examiners conduct community contact interviews to obtain a profile of the local community, identify credit needs and opportunities, and evaluate local financial institutions' responsiveness to those needs. Examiners reviewed a recent community contact interview that was conducted with an individual from a community development organization within the assessment area. The community contact provided the following comments. Economic conditions in Franklin County are strong. Strengths of the area include quality of life and the depth of manufacturing in the local economy, while weaknesses include a lack of housing and slow population growth. The contact identified a need for additional hotel accommodations, in addition to a need for more affordable housing. Overall, financial institutions are meeting banking and credit needs, and creditworthy individuals and businesses can obtain financing. Lower-income families generally cannot afford to purchase a home, and the lack of available housing stock serves as a barrier.

Credit and Community Development Needs and Opportunities

Considering information from bank management, the community contact, and demographic and economic data, small business and home mortgage loans represent primary credit needs in the assessment area. In addition, the community contact identified a general lack of affordable housing as a specific community development need. The assessment area provides opportunities for banks to participate in community development activities through affordable housing initiatives, economic development, and community services targeted to low- and moderate-individuals.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated March 8, 2021, through the current evaluated dated February 5, 2024. Examiners used FFIEC Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's CRA performance, which includes the Lending and Community Development tests. Please refer to the *Intermediate Small Bank Performance Criteria* section of the appendices for a summary of these tests. Affiliate lending activities were not considered in this evaluation.

Activities Reviewed

The bank's primary business focus is commercial lending. This conclusion considered the bank's business strategy and Call Report data. Residential real estate lending comprises the second largest portion of the loan portfolio. As a result, examiners reviewed small business and home mortgage loans to evaluate CRA performance, with small business lending receiving greater weight when drawing overall conclusions. Bank records and discussions with management indicated the product mix remained consistent throughout the evaluation period. Small farm loans were not reviewed during this evaluation since agricultural lending is not a major product line.

For the Lending Test, examiners considered all small business loans originated or renewed in 2023. Management indicated that a review of lending activity from this timeframe would yield a representative analysis of small business lending performance since the prior evaluation. The bank originated 187 small business loans totaling \$31.0 million. Examiners reviewed the entire universe of loans to evaluate Assessment Area Concentration. However, the Geographic Distribution analysis only focused on loans made within the assessment area, which consisted of 131 loans totaling \$21.6 million. For the Borrower Profile analysis, examiners reviewed a sample of 53 loans totaling \$9.9 million within the assessment area. Examiners compared small business lending performance to 2023 D&B business demographic data.

Examiners also reviewed and analyzed all home mortgage loans reported on the bank's HMDA loan application registers in 2020, 2021, and 2022. The institution reported 626 loans totaling \$133.0 million in 2020; 469 loans totaling \$86.3 million in 2021; and 287 loans totaling \$58.6 million in 2022. The Geographic Distribution and Borrower Profile analyses included all home mortgage loans originated inside the assessment area, which included 455 loans totaling \$78.3 million in 2020; 352 loans totaling \$59.2 million in 2021; and 191 loans totaling \$29.4 million in 2022. While examiners reviewed all three years of home mortgage lending, only 2022 HMDA data is presented for the Geographic Distribution and Borrower Profile analyses, as examiners did not identify any trends between years that materially impacted overall conclusions. Home mortgage lending performance in 2022 was compared to aggregate lending data and 2020 U.S. Census data. Examiners primarily focus on comparisons to aggregate lending data since this data is a better indicator of market conditions and area loan demand.

Examiners analyzed lending performance by both number and dollar volume of loans. However, examiners emphasized performance by number of loans when evaluating the Geographic Distribution and Borrower Profile criteria, as it is generally a better indicator of the efforts to serve small businesses and low- and moderate-income individuals.

For the Community Development Test, examiners considered community development loans, qualified investments, and community development services since the prior evaluation. Qualified investments purchased before the prior evaluation that remained outstanding as of February 5, 2024, were also considered. Examiners excluded loans considered under the Lending Test from the Community Development Test.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

United Bank of Union demonstrated satisfactory performance under the Lending Test, which is collectively supported by performance under all evaluated criteria.

Loan-to-Deposit Ratio

The net loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The net loan-to-deposit ratio, calculated from Call Report data, averaged 90.3 percent over the past 11 calendar quarters from March 31, 2021, to September 30, 2023. The ratio ranged from a low of 80.7 percent, as of March 31, 2021, to a high of 90.3 percent,

as of September 30, 2023. As shown in the following table, the institution's average net loan-to-deposit ratio compares reasonably to comparable institutions. Examiners identified comparable institutions based on their asset size, lending focus, branching structure, and geographic location.

Loan-to-Deposit Ratio Comparison			
Bank		Total Assets as of 09/30/2023 (\$000s)	Average Net LTD Ratio (%)
United Bank of Union, Union, Missouri		534,357	90.3
Farmers and Merchants Bank of Saint Clair, Saint Clair, Missouri		337,217	72.5
Heritage Community Bank, Union, Missouri		247,175	105.4

Source: Reports of Condition and Income 03/31/2021 through 09/30/2023

Assessment Area Concentration

United Bank of Union extended a majority of small business and home mortgage loans within its assessment area.

Loan Category	Lending Inside and Outside of the Assessment Area									
	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
#	%	#	%	#	\$	%	\$	%	\$(000s)	
Small Business	131	70.1	56	29.9	187	21,614	69.7	9,403	30.3	31,017
Home Mortgage										
2022	191	66.6	96	33.4	287	29,389	50.2	29,209	49.8	58,598
2021	352	75.1	117	24.9	469	59,150	68.6	27,137	31.4	86,287
2020	455	72.7	171	27.3	626	78,336	58.9	54,632	41.1	132,968
HMDA Subtotal	998	72.2	384	27.8	1,382	166,875	60.1	110,978	39.9	277,853

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Examiners focused on the percentages by number of loans made in the moderate-income census tracts within the assessment area.

Small Business Loans

As shown in the following table, the bank's small business lending in moderate-income census tracts is 16.8 percent less than the percentage of businesses in these tracts. When evaluating this performance, examiners considered that six competing financial institutions operate in or in closer proximity to six of the seven moderate-income census tracts in the assessment area. Additionally, six of the ten largest small business lenders in Franklin County were credit card institutions, indicating that area businesses are actively using revolving credit to address ongoing credit needs. Considering these competitive factors, the geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	29.8	17	13.0	2,187	10.1
Middle	62.3	111	84.7	18,969	87.8
Upper	7.9	3	2.3	458	2.1
Totals	100.0	131	100.0	21,614	100.0

Source: 2023 D&B Data; Bank Data.
Due to rounding, totals may not equal 100.0%.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The bank's lending in moderate-income geographies is comparable to aggregate lending data and demographic data. See the following table for details.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate	21.7	24.0	43	22.5	6,530	22.2
Middle	71.4	69.1	141	73.8	21,142	71.9
Upper	6.9	6.8	7	3.7	1,717	5.8
Totals	100.0	100.0	191	100.0	29,389	100.0

Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and individuals of different income levels. Examiners focused on the number of loans to businesses with gross annual revenues of \$1 million or less and loans to low- and moderate-income borrowers.

Small Business Loans

As illustrated in the following table, the percentage of small business loans made to businesses with gross annual revenues of \$1 million or less significantly lags the percentage of businesses in this revenue category. However, of the 18 loans made to businesses with revenues exceeding \$1 million, 10 were made to the same few borrowers, which skews the respective lending percentages. In addition, all 7 loans in the Revenue Not Available category were to newly formed business entities. While United Bank of Union does not report small business data, aggregate lending data provides an indicator of loan demand and other relevant performance context factors. Aggregate performance in 2022, the most recent data available, revealed that 50.4 percent of loans were to small businesses with gross annual revenues of \$1 million or less. Considering these factors, the distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$ (000s)	%
<=\$1,000,000	91.4	28	52.8	3,089	31.2
>\$1,000,000	2.8	18	34.0	4,459	45.0
Revenue Not Available	5.8	7	13.2	2,356	23.8
Total	100.0	53	100.0	9,904	100.0

Source: 2023 D&B Data, Bank Data.
Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. As shown in the following table, the bank's lending to low-income individuals exceeds comparable demographic data and aggregate lending data. Lending to moderate-income individuals is comparable to aggregate lending data and demographic data.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$ (000s)	%
Low	22.3	17.0	50	26.2	4,514	15.4
Moderate	22.0	23.5	47	24.6	6,273	21.3
Middle	25.4	19.4	30	15.7	4,430	15.1
Upper	30.4	20.1	43	22.5	9,853	33.5
Not Available	0.0	20.1	21	11.0	4,320	14.7
Totals	100.0	100.0	191	100.0	29,389	100.0

Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

United Bank of Union's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

Examiners compared the bank's level of community development activity to three financial institutions with similar business focuses and asset sizes operating within the St. Louis, Missouri-Illinois MSA. These institutions were also evaluated using Interagency Intermediate Small Institution Examination Procedures.

Community Development Loans

United Bank of Union originated or renewed 105 community development loans totaling \$42.4 million during the evaluation period. This level of community development lending represents 7.9 percent of total assets and 10.4 percent of net loans as of September 30, 2023. These ratios have declined since the prior evaluation, when these ratios were 14.6 percent and 20.1 percent, respectively. However, the institution originated a notable volume of SBA Paycheck Protection Program loans during the prior evaluation period, which boosted both ratios and overall community development lending activity.

United Bank of Union's community development lending levels are similar to comparable institutions' lending levels. The comparable institutions originated or renewed community development loans ranging from \$54.4 million to \$138.2 million, some of which included SBA Paycheck Protection Program loan activity. Community development lending ranged from 9.3 percent to 15.8 percent of total assets and 16.2 percent to 18.4 percent of net loans for these comparable institutions.

Loans originated in the broader statewide/regional area are included in this analysis since the bank appropriately addressed the community development needs of its assessment area. The following tables illustrate the bank's community development lending activity by category, area, and activity year.

Area	Community Development Lending by Activity Area								Totals	
	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize			
#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#
Assessment Area	0	0	0	0	81	5,932	0	0	81	5,932
Statewide/Regional Area	3	10,845	4	13,900	15	4,565	2	7,179	24	36,489
Total	3	10,845	4	13,900	96	10,497	2	7,179	105	42,421

Source: Bank Data

Activity Year	Community Development Lending by Activity Year								Totals	
	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize			
#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#
2021 (partial)	1	2,520	1	2,500	83	2,935	0	0	85	7,955
2022	2	8,325	1	1,000	13	7,562	2	7,179	18	24,066
2023	0	0	2	10,400	0	0	0	0	2	10,400
Year-to-Date 2024	0	0	0	0	0	0	0	0	0	0
Total	3	10,845	4	13,900	96	10,497	2	7,179	105	42,421

Source: Bank Data

The following points summarize notable examples of the bank's community development lending during the evaluation period.

- In 2022, the bank renewed a \$1.7 million loan to provide needed financing to a business located in a moderate-income census tract that employs low- and moderate-income individuals.
- In 2023, the bank renewed two loans totaling \$7.1 million to finish the construction of a medical facility located in a low-income census tract in the broader statewide area.
- In 2022, the bank originated two loans totaling \$12.9 million to provide financing for low-income housing developments in the broader regional area.
- In 2021 and 2022, the bank originated two loans totaling \$3.5 million to finance equipment, software, and needed inputs for a business located in a low-income census tract that services the surrounding community.

Qualified Investments

United Bank of Union made 43 qualified investments, including donations and grants, totaling \$3.0 million. The substantial majority of these investments were in local school district bonds where a majority of the student population qualifies for free or reduced-price lunches.

The volume of qualified investments represents 0.6 percent of total assets and 3.8 percent of total securities as of September 30, 2023. These ratios have declined since the prior evaluation, when the ratios were 2.2 percent and 12.4 percent, respectively. United Bank of Union's qualified investment activity is similar to comparable institutions' activities. Comparable institutions had qualified investments ranging from 0.2 percent to 0.3 percent of total assets and 0.6 percent to 9.2 percent of total securities. The following tables summarize the bank's qualified investment activity by category, area, and activity year.

Qualified Investments by Activity Area										
Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Assessment Area	0	0	39	3,017	2	1	0	0	41	3,018
Statewide/Regional Area	0	0	2	<1	0	0	0	0	2	<1
Total	0	0	41	3,017	2	1	0	0	43	3,018

Source: Bank Data

Qualified Investments by Activity Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	3	1,342	0	0	0	0	3	1,342
2021 (partial)	0	0	0	0	0	0	0	0	0	0
2022	0	0	2	1,500	0	0	0	0	2	1,500
2023	0	0	4	158	0	0	0	0	4	158
Year-to-Date 2024	0	0	0	0	0	0	0	0	0	0
Subtotal	0	0	9	3,000	0	0	0	0	9	3,000
Qualified Grants & Donations	0	0	32	17	2	1	0	0	34	18
Total	0	0	41	3,017	2	1	0	0	43	3,018

Source: Bank Data

Community Development Services

The bank received consideration for 86 community development services that primarily supported economic development activities and community services targeted to low- and moderate-income individuals. This level of activity increased from 67 activities at the prior evaluation. The bank's level of activity is similar to the activity of the comparable institutions. These institutions received consideration for community development services ranging from 38 to 82 activities.

The following tables illustrates the bank's community development services by category, area, and activity year.

Community Development Services by Activity Area					
Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Assessment Area	7	32	35	2	76
Statewide/Regional Area	0	7	3	0	10
Total	7	39	38	2	86

Source: Bank Data

Community Development Services by Activity Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021 (partial)	1	5	6	0	12
2022	2	10	12	0	24
2023	2	12	10	1	25
Year-to-Date 2024	2	12	10	1	25
Total	7	39	38	2	86

Source: Bank Data

The following points summarize notable examples of the bank's community development services provided by bank employees during the evaluation period.

- A bank officer and Board member both serve as directors for an organization focused on industrial park development and aiding in the expansion of existing businesses in the community.
- A Board member serves in various officer and director roles for three inter-related organizations that work to expand economic development opportunities in the assessment area.
- Three bank officers and Board members served an organization focused on expansion of industrial businesses in the assessment area.

In addition to community development services, United Bank of Union offers a variety of retail services including credit and deposit products for consumers and businesses. Additionally, the bank operates its main office and a deposit-taking ATM in a moderate-income census tract.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

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

Community Development Test

The Community Development Test considers the following criteria:

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

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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