



PUBLIC DISCLOSURE

August 13, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Extraco Banks, National Association
Charter Number 13778

18 South Main Street
Temple, TX 76501

Office of the Comptroller of the Currency

10001 Reunion Place
Suite 250
San Antonio, TX 78216-4165

NOTE: 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, and should not 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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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **Extraco Banks, National Association** (Extraco) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Extraco Banks, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support the institution’s rating include:

- Lending activity during the evaluation period reflects good responsiveness to credit needs in the Temple Assessment Area (AA) and the Waco AA, the bank’s main markets.
- Extraco originated a majority, by number (80 percent) and by dollar volume (75 percent), of reportable loans inside its AAs.
- The geographic distribution of loans reflects good dispersion.
- The distribution of loans by borrower income level reflects adequate penetration to borrowers of different incomes and to businesses of different sizes.
- Community development (CD) lending reflects excellent responsiveness to AA credit needs and had a positive impact on the bank’s lending test performance.
- CD investment performance reflects excellent responsiveness to AA needs.
- Retail banking systems and services are accessible to individuals and businesses of all income levels throughout the AAs.
- CD services reflect good responsiveness in meeting identified community needs within the AAs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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.

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, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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 percent and less than 120 percent, in the case of a geography

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

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): 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, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

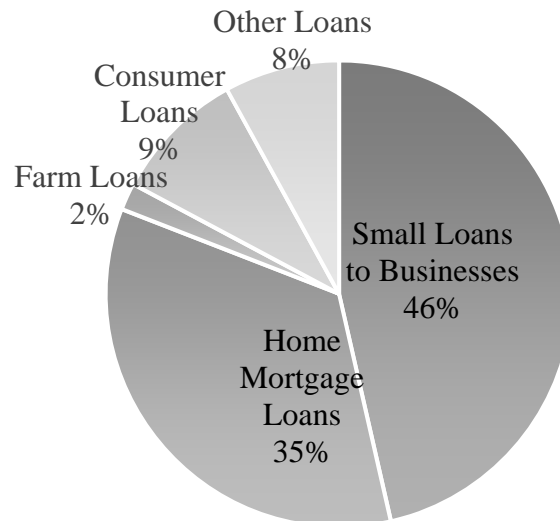
Extraco, a \$1.43 billion intrastate bank headquartered in Temple, Texas, has 15 locations in the Central Texas area. The main office and 11 branches are located in the bank's main markets; seven, including the main office, in the Temple AA and five in the Waco AA. There is one branch each in the Bryan, Georgetown, and Hamilton AAs. All locations have a deposit-taking automatic teller machine (ATM) available for 24-hour banking. In addition, there are 12 deposit-taking, stand-alone ATMs located throughout the cities of Waco, Temple, and Killeen.

Extraco is a wholly-owned subsidiary of Extraco Corporation, a one-bank holding company headquartered in Waco, Texas. There have been no mergers or acquisition activity that has affected bank operations during the evaluation period.

Extraco's total equity capital as of June 30, 2018 was \$142.6 million, resulting in a tier one capital ratio of 10 percent and a total risk based capital ratio of 17 percent.

The bank's business focus is providing home mortgage and commercial loans. As of June 30, 2018, loans represented 63 percent of total assets and the bank had a loan-to-deposit ratio of 77 percent. Deposits totaled \$1.16 billion with 97 percent from individuals or businesses. Public funding from local municipalities totals 3 percent of deposits. The bank had no foreign deposits.

As of June 30, 2018, the bank's loan portfolio totaled \$918 million. Refer to the following chart for a breakdown by general product type. First lien mortgages, \$263 million or 29 percent of total loans, represent the majority of the home mortgage loan percentage. Non-owner occupied commercial real estate, \$172 million or 14 percent of total loans, represents the second largest loan type. These loans are included in the small loans to businesses percentage. Consumer loans were primarily automobile loans.



According to the FDIC's June 30, 2017 Deposit Market Share Report, Extraco ranked fifth of 68 institutions with branches in the AAs, with 5 percent deposit market share. Wells Fargo Bank ranked first with almost 12 percent and JP Morgan Chase Bank ranked second with almost 9 percent. In addition, Extraco faces strong competition for deposits and loans from multi-national and regional banking companies such as Bank of America, N.A., Compass Bank, Capital One and Frost Bank.

Other competitors for deposits and loans include Prosperity Bank, Central National Bank, First State Bank of Central Texas, Regions Bank, and non-traditional sources such as national and regional mortgage companies, finance companies, credit unions, and securities firms. Credit unions are especially competitive for consumer deposits, auto lending, and home improvement/home equity lending.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AAs. The prior examination, dated November 30, 2015, assigned an overall Satisfactory rating to Extraco's CRA performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. The Lending Test included a review of residential mortgage loans subject to filing under the HMDA, small loans to businesses subject to filing under the CRA, and CD loans. The evaluation did not include an assessment of small loans to farms or consumer loans as analyzing the limited number of loans originated during the evaluation period would not be meaningful. The Investment Test included a review of investments and grants that meet the definition of CD made in the bank's AAs. The Service Test included a review of retail and CD services provided in the AAs.

Except for CD loans, the evaluation period for the Lending Test covered January 1, 2016 through December 31, 2017. For CD loans, the Investment Test, and the Service Test, the evaluation period covered November 30, 2015, the date of the last CRA evaluation, to August 13, 2018, the start date of the current CRA evaluation. We based conclusions related to CD loans and qualified investments on the number and dollar volume originated during the evaluation period. We also considered the level of innovation, complexity, responsiveness to community credit needs, and the degree to which private investors do not provide these instruments.

Data Integrity

In February 2018 and June 2018, we verified the accuracy of data made available to the public in accordance with HMDA and CRA loan data reporting requirements. Public data includes home mortgage loans and small loans to businesses and farms. We also reviewed non-public CD data that management provided to ensure it met regulatory CD definitions. Based on the verification work performed, publicly reported lending data and non-public CD data are accurate and reliable for use during this examination.

Selection of Areas for Full-Scope Review

We selected two of the bank's five AAs, the Temple AA and the Waco AA, for full-scope reviews. We selected these AAs for full-scope reviews because a substantial majority of reported loans (79 percent) and deposits (93 percent) originated inside these two AAs. The Temple AA originated 57 percent of reported loans and 70 percent of the deposits. The Waco AA originated 23 percent of reported loans and 22 percent of the deposits.

We performed limited-scope reviews on the Bryan AA, the Georgetown AA, and the Hamilton AA. Combined, these three AAs originated 21 percent of reported loans and 6 percent of deposits.

Extraco's five AAs meet regulatory requirements, as each consists of whole geographies and does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income geographies. Refer to Appendix A: Scope of Examination for additional detail.

Ratings

The bank's overall rating is based primarily on the full-scope reviews of the Temple AA and the Waco AA. In our Lending Test analysis, we gave more weight to performance in the Temple AA because it accounts for 57 percent of the loans and 70 percent of the deposits analyzed. In comparison, the Waco AA had 23 percent of the loans and 22 percent of the deposits. In our Community Development Test analysis, we gave performance in the Waco AA equal weight to the Temple AA due to the greater number of CD needs and opportunities in the Waco AA because of high poverty level and the high percentage of low- and moderate-income individuals.

We placed the most weight on home mortgage loan performance in determining the Lending Test rating. We also gave credit for the significant volume of CD loans that originated during the evaluation period.

Other

As part of this evaluation, we contacted a local governmental organization and a non-profit organization focused on small business and economic development to determine community credit needs in the bank's full-scope AAs. The contacts indicated the most pressing credit needs are affordable housing and small business lending. Other identified needs included financial literacy, ongoing training for small businesses, and education for homebuyers.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Extraco's performance under the lending test is rated "High Satisfactory." Home mortgage loans received the most weight followed by small loans to businesses in evaluating CRA performance. Factors that supported the rating include: a high percentage of loans originated inside the AA; excellent geographic dispersion of home mortgage loans, good geographic dispersion of small loans to businesses, and good penetration of both home mortgage loans and small loans to businesses of different incomes and revenues. The significant level of CD lending had a positive impact on the rating.

Lending Activity

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's lending activity. We identified mortgage loan products and small loans to businesses as the primary products for evaluating CRA performance. Mortgage loan products include home purchase loans, home refinance loans, and home improvement loans.

According to the FDIC's June 30, 2017 Deposit Market Share Report, Extraco ranked first of 20 institutions in the Temple AA with a 16 percent deposit market share. Compass Bank ranked second with 14 percent and National United ranked third with 11 percent. In the Waco AA, Extraco ranked eighth of 28 institutions with a 5 percent deposit market share. First National Bank of Central Texas ranked first with 13 percent and Central National Bank ranked second with 11 percent.

In the Temple AA, the 2016 aggregate small business peer data indicated Extraco ranked sixth of 69 reporting lenders for originating small loans to businesses with 7 percent market share by number and 19 percent by dollar amount. In the Waco AA, the 2016 aggregate small business peer data indicated Extraco ranked seventh of 67 reporting institutions with 4 percent market share by number and 10 percent by dollar amount. The 2017 aggregate small business peer data had not been published yet during this evaluation.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O in Appendix C, the geographic distribution of home mortgage loan originations and purchases reflects excellent dispersion.

In the Temple AA, the geographic distribution of home mortgage loans in low- and moderate-income tracts is excellent. The distribution of loans in the low-income tracts is equal to area demographics and exceeds aggregate data from other HMDA reporters reflecting excellent dispersion. The distribution of loans in the moderate-income tracts is near or equal to area demographics and exceeds aggregate data from other HMDA reporters reflecting excellent dispersion.

In the Waco AA, the geographic distribution of home mortgage loans in low- and moderate-income tracts is good. The distribution of loans in the low-income tracts exceeds area demographics and aggregate data from other HMDA reporters reflecting excellent dispersion. The distribution of loans in the moderate-income tracts is somewhat lower than area demographics and aggregate data from other HMDA reporters reflecting reasonable dispersion.

Small Loans to Businesses

Based on the data in Table Q in Appendix C the geographic distribution of small loans to businesses reflects adequate dispersion.

In the Temple AA, the geographic distribution of small loans to businesses in low- and moderate-income tracts is adequate. The distribution of loans in the low-income tracts is somewhat lower than area demographics and aggregate data from other area small business lenders reflecting reasonable dispersion. The distribution of loans in the moderate-income tracts is somewhat lower than area demographics and aggregate data from other area small business lenders reflecting reasonable dispersion.

In the Waco AA, the geographic distribution of small loans to businesses in low- and moderate-income tracts is adequate. The distribution of loans in the low-income tracts is equal to area demographics and aggregate data from other area small business lenders reflecting excellent dispersion. The distribution of loans in the moderate-income tracts is somewhat lower than area demographics and other area small business lenders reflecting reasonable dispersion.

Lending Gap Analysis

We reviewed reports and maps detailing home mortgage loans and small loans to businesses originated during the evaluation period. No conspicuous gaps in the geographic distribution of loans were identified.

Inside/Outside Ratio

A majority of reportable loans originated inside the bank's AAs. Reported loan data, on a bank wide basis and not by individual AA, reflected that for the evaluation period, 80 percent of the total number and 75 percent of the total dollar volume of reportable loans originated inside the AAs. By loan product and number of loans, 87 percent of small loans to businesses and 76 percent of home mortgage loans originated inside the AAs.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P in Appendix C the borrower distribution of home mortgage loans reflects adequate penetration.

In the Temple AA, the distribution of home mortgage loans to individuals of different income levels is adequate. The distribution of loans to both low- and moderate-income families is lower than area demographics, but equal to aggregate data from other HMDA reporters and reflects adequate penetration.

In the Waco AA, the distribution of home mortgage loans to individuals of different income levels is adequate. The distribution of loans to low-income families is lower than area demographics, but equal to aggregate data from other HMDA reporters reflecting poor penetration. The distribution of loans to moderate-income families is somewhat lower than area demographics, but equal to aggregate data from other HMDA reporters reflecting adequate penetration.

Small Loans to Businesses

Based on the data in Table R in Appendix C the distribution of small loans to businesses by revenue reflects adequate penetration.

In the Temple AA, the distribution of small loans to businesses by revenue is adequate. The proportion of loans was significantly weaker than the proportion of small businesses, and comparable to the aggregate distribution of loans to those businesses.

In the Waco AA, the distribution of small loans to businesses by revenue is adequate. The proportion of loans was significantly weaker than the proportion of small businesses, and comparable to the aggregate distribution of loans to those businesses.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, the bank originated three CD loans totaling \$6.26 million in the Temple AA. They include a:

- \$5.6 million loan for construction and permanent financing of an office building that will be occupied by a non-profit economic development organization. This will lead to the creation of additional jobs for low- and moderate-income individuals, and promoting stability in a moderate-income area.
- \$275 thousand loan to a non-profit organization in order to purchase and convert a building in a moderate-income area into a homeless shelter.
- \$385 thousand loan to a non-profit organization in order to purchase a building in a low-income area that it previously leased for its operations. This provided job stability for low- and moderate-income individuals.

During the evaluation period, the bank originated three CD loans totaling \$18 million in the Waco AA. They include a:

- \$16 million loan participation purchase to upgrade and expand the local convention center, revitalizing a moderate-income area and promoting economic growth by creating additional jobs for low- and moderate-income individuals.
- \$1.15 million loan to construct a building in a moderate-income area that will be occupied by a non-profit organization that promotes economic development.
- \$1.14 million loan for the purchase of a building to ensure the occupation by a retail store. This assisted in stabilizing a moderate-income area to retain jobs for low- and moderate-income individuals.

Product Innovation and Flexibility

Extraco uses innovative and flexible lending programs to help meet AA credit needs. On December 1, 2016, Extraco began offering the *Solution Home Purchase Loan Program* (SHPLP), which allows up to 100 percent loan-to-value financing to qualifying individuals with household income meeting the low- or moderate-income guidelines for the AAs. SHPLP loans require a minimum credit score of 580 or demonstrated payment history for borrowers with a “no score” credit report due to lack of traditional credit history. The SHPLP is for principal residence only and may have up to a 30-year maturity at a fixed rate. Down payment assistance programs including Habitat for Humanity and Neighborhood Housing Services programs, are allowed. Completion of Homebuyers Education and Financial Literacy classes are required for down payment assistance program participation. In 2017, Extraco originated seven loans ranging from \$49 thousand to \$89.5 thousand that totaled \$453.5 thousand. In 2018 (through July 31, 2018), Extraco originated 13 loans ranging from \$55 thousand to \$169 thousand that totaled \$1.12 million. Through July 31, 2018, Extraco has originated 20 SHPLP loans totaling \$1.57 million.

Similarly, the bank offers a *Solution Home Improvement Loan Program*, which allows up to 98 percent combined loan-to-value home improvement financing to qualifying individuals with household incomes meeting low- or moderate-income guidelines for the AAs. The minimum credit score for participation in the program is 550 or if the borrower has a “no score” credit report, then demonstrated payment history. Extraco originated one loan totaling \$10 thousand during the evaluation period under this program.

The bank has originated 56 *Solution Unsecured loans* totaling \$70 thousand, with the average loan amount of \$1,300 during the evaluation period.

Solution Banking (SB), is Extraco’s basic, low-cost checking account with a debit card made available to consumers who may have poor credit or a negative ChexSystems history. Extraco used a lower ChexSystems score threshold to allow these consumers greater access to banking services while reasonably managing the associated risk. Extraco developed this product primarily to bank the unbanked and underbanked consumers in its AAs. SB offers many products and services free of charge including debit card, online banking, direct deposit, mobile banking, online bill pay, and use of Extraco ATMs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bryan AA, Georgetown AA, and Hamilton AA is weaker than the bank's overall "high satisfactory" performance under the lending test. Refer to the tables in Appendix C for the facts and data supporting these conclusions.

INVESTMENT TEST

Extraco's performance under the investment test is rated "Outstanding." The bank has an excellent level of CD investments, grants, and donations, reflecting an excellent responsiveness to community needs. Extraco makes no use of innovative or complex investments.

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix C for the facts and data used to evaluate the qualified investments.

Performance in the Temple AA is excellent. Qualified investments made during the assessment period totaled \$430 thousand and consisted of debt investments and donations. In addition, there are \$189 thousand in prior period long-term debt investments still outstanding at the end of the current evaluation period. Investments made in prior periods continue to have a positive impact on the AA. In aggregate, qualified investments and outstanding prior period investments total \$619 thousand in the Temple AA.

Performance in the Waco AA is excellent. Qualified investments made during the assessment period totaled \$1.7 million and consisted of debt investments, grants, and donations. In addition, there are \$6 million in prior period long-term debt investments still outstanding at the end of the current evaluation period. Investments made in prior periods continue to have a positive impact on the AA. In aggregate, qualified investments and outstanding prior period investments total \$7.7 million in the Waco AA.

Debt Investments

During the evaluation period, Extraco purchased three portions of Federal Home Loan Mortgage Corporation (FHLMC) Mortgage-Backed Securities (MBSs) totaling \$328 thousand in the Temple AA. The portions of the MBSs purchased are supported by mortgages made to low- and moderate-income individuals in the AA.

During the evaluation period, Extraco purchased four Federal National Mortgage Association (FNMA) Delegated Underwriting and Servicing (DUS) MBSs totaling \$1.3 million in the Waco AA. These are supported by a multi-family affordable housing project for tenants whose income does not exceed 50 percent of the median income in the AA. Extraco also purchased portions of two FHLMC MBSs totaling \$218 thousand. The portions of the MBSs purchased are supported by mortgages made to low- and moderate-income individuals in the AA.

Grants and Donations

Other qualified investments include grants and donations to organizations that support low- and moderate-income individuals and geographies.

Extraco made 45 donations totaling \$101 thousand to organizations in the Temple AA. Donations to the following organizations provide a cross-section of the activities and funding provided:

- United Way of Central Texas – \$30 thousand donated to this organization located in Temple; it offers funding to various nonprofit organizations focused on assisting low- and moderate-income individuals and families.
- Gatesville Care Center – \$8 thousand donated to this Central Texas food bank location that provides food to low- and moderate-income individuals.
- Food Care Center of Killeen – \$7 thousand donated to this organization that provides food items to low- and moderate-income individuals in need.

Extraco made 66 grants and donations totaling \$180 thousand to organizations in the Waco AA. Grants and donations to the following organizations provide a cross-section of the activities and funding provided:

- Federal Home Loan Bank (FHLB) Dallas – Extraco participates in the FHLB's Homebuyer Equity Leverage Partnership (HELP) program, through grants that assist low-income qualified, first-time homebuyers with down payment assistance and closing costs. Extraco provided nine grants totaling of \$33 thousand to individuals in McLennan County.
- United Way of Waco- McLennan County – \$20 thousand donated to this organization that offers funding to various nonprofit organizations focused on assisting low- and moderate-income individuals and families.
- Mission Waco – \$7 thousand donated to this organization that operates programs focused on low- and moderate-income individuals. Some of the programs include a residential alcohol/drug recovery home and a homeless shelter.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bryan AA is not inconsistent with the bank's overall excellent performance under the investment test. Extraco purchased \$2 million in FNMA DUS MBSs that help provide affordable housing to low-income tenants in the Bryan AA. Extraco donated \$7 thousand to 10 qualifying CD organizations, including \$3 thousand for Habitat for Humanity and United Way of Brazos Valley.

Extraco's performance in the Georgetown AA is weaker than the performance in the full-scope AAs. Extraco did not make any qualifying investments in the Georgetown AA during the evaluation period; but it donated \$2 thousand to three qualifying CD organizations. The donations included a \$1,250 donation to the Partnership for Children, a non-profit that offers resources to support and comfort foster children.

Performance in the Hamilton AA is weaker than the performance in the full-scope AAs. Extraco did not make any qualifying investments or donations during the evaluation period. CD opportunities are limited in this AA due to the rural nature of the location and the lack of low- and moderate-income geographies.

Broader Statewide or Regional Areas

In addition, Extraco purchased \$5.1 million of qualified debt and equity investments outside of the AAs but in the state of Texas where the bank has its AAs. This activity also had a positive impact on the investment test. Examples include:

- \$100 thousand in Texas Department of Housing and Community Affairs Single Family Mortgage Revenue Bonds.
- \$70 thousand of a \$1 million commitment with the SBIC Valesco Commerce Street Capital L.P.
- \$1.1 million of a \$4 million commitment with the SBIC Valesco Fund II, L.P.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Extraco's performance under the service test is rated "High Satisfactory." Extraco's service delivery systems and services are accessible to individuals and businesses of all income levels throughout the AAs. The closure of two branches, one from each full-scope AA, has not adversely affected the accessibility of its delivery systems or services.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Extraco offers a variety of financial services designed to meet the credit needs of its communities through its branch network. Deposit services include checking and savings accounts, certificates of deposit, ATM services, and individual retirement accounts.

Extraco's services and business hours do not vary in a way that would inconvenience any portion of the AAs or any group of individuals. Branch hours are tailored to meet the needs of the individual communities the bank serves and are consistent with other financial institutions within the individual communities. Branch maps did not indicate any significant gaps in the geographic distribution of branches. In addition to traditional brick and mortar facilities, Extraco offers a broad range of alternative delivery channels including internet banking and a telephone customer service center.

Extraco's delivery systems provide good access to geographies and individuals of different income levels. As of the evaluation date, Extraco had 15 full service banking locations: the main office and six branches in the Temple AA; five branches in the Waco AA; and a single branch with a deposit-taking ATM, in each of the three limited-scope AAs.

Extraco's record of opening and closing branches is reasonable and has not adversely affected the accessibility of its delivery system. Extraco operates seven full service banking locations and 15 ATMs in the Temple AA, its headquarters and largest market. Five branches and three deposit-taking ATMs are in the Waco AA. Extraco did not open any new locations during the evaluation period; however, it closed two branches; one in a moderate-income tract in the Temple AA and one in a middle-income tract in the Waco AA. Management maintains a branch opening and closing policy that meets all regulatory requirements.

Extraco's geographic distribution of branches and ATMs in low-income tracts is less than the percentage of low- and moderate-income individuals or families in these tracts; however, the distribution of branches in moderate-income tracts exceeds the percentages

Community Development Services

CD services in the Temple AA reflect good responsiveness in meeting identified community needs. During the evaluation period, Extraco management and employees participated in 104 activities that provided qualified CD services. They focused efforts on activities and organizations supporting affordable housing and social services for low- and moderate-income individuals. Extraco employees serve as Board members and provide financial expertise by serving on various committees of organizations supporting affordable housing, child-care for low- and moderate-income individuals, and financial literacy for low- and moderate-income individuals. Management has also been involved in activities and charitable non-profit organizations supporting economic development through job training for low- and moderate-income individuals and the revitalization of low- and moderate-income geographies. Some examples of Extraco's involvement in the Temple AA during the evaluation period include the following:

- Central Texas Housing Consortium – provides and manages affordable housing and administers programs that offer opportunities for low- and moderate-income individuals to advance in society.
- Community Loan Center of Texas – a non-profit lending intermediary providing loan products and development services to Texas CDCs, CDFIs and other community development organizations. The non-profit's mission is to provide specialized loan and investment products and services that promote economic and community development in underserved Texas communities.
- A New Day Fellowship Learning Academy – a non-profit organization that provides daycare to children ages 0-3 years and after school care to children of low- and moderate-income families.

CD services in the Waco AA reflect excellent responsiveness in meeting identified community needs. During the evaluation period, Extraco participated in 328 activities that provide qualified CD services. Bank management and employees focused efforts on activities and organizations supporting affordable housing and social services for low- and moderate-income individuals. Extraco employees serve as Board members and provide financial expertise by serving on various committees of organizations supporting education needs and financial literacy for low- and moderate-income individuals. Management has also been involved in activities and charitable non-profit organizations supporting education and economic development through lending to small businesses and the revitalization of low- and moderate-income geographies. Some examples of Extraco's involvement in the Waco AA during the evaluation period include the following:

- Waco Habitat for Humanity – is dedicated to eliminating substandard housing locally through the construction, rehabilitation, and preservation of homes; they advocate for fair and just housing policies; and provide training and access to resources to help families improve their shelter conditions. The average cost for a Habitat for Humanity home in Waco is \$72 thousand with an average mortgage payment of \$390, making it more affordable for low- and moderate-income individuals.

- Prosper Waco – an initiative to bring together community leaders and organizations in the areas of education, health, and financial security to address community challenges. The main focus of the initiative is to ensure more low- and moderate-income individuals are able to complete a college degree or workforce certificate, increase the level of healthcare available in the community, and ensure Waco-area households will earn incomes that provide financial stability.
- Compassion Ministries – an organization whose goal is to reintegrate homeless families, children, and those on the verge of homelessness into permanent housing and employment. Compassion Ministries provides job training/search, daycare, children’s programs, and GED preparation services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Extraco’s performance under the service test in the limited-scope AAs is consistent with the “High Satisfactory” rating received in the full scope review AAs. Extraco’s retail delivery services are limited to single branches in each of the limited-scope AAs. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): January 1, 2016 to December 31, 2017 Investment and Service Tests and CD Loans: November 30, 2015 to July 30, 2018	
Financial Institution	Products Reviewed	
Extraco Banks National Association, Temple, Texas	Small Business Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Temple AA	Full-Scope	Killeen-Temple MSA, #28660; entire MSA
Waco AA	Full-Scope	Waco MSA, #47380; entire MSA
Bryan AA	Limited-Scope	Bryan-College Station MSA, #17780; City of Bryan only
Georgetown AA	Limited-Scope	Austin-Round Rock MSA #12420; City of Georgetown only
Hamilton AA	Limited-Scope	Non-MSA; City of Hamilton only

Appendix B: Market Profiles for Full-Scope Areas

Temple AA

Demographic Information for Full-Scope Area: Temple Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	86	4% or 3	22% or 19	49% or 42	20% or 17	5 or 6%
Population by Geography	409,925	2%	18%	54%	26%	1%
Owner-Occupied Housing by Geography	160,856	1%	9%	57%	33%	0%
Businesses by Geography	18,469	5%	15%	53%	27%	0%
Farms by Geography	758	3%	7%	56%	34%	0%
Family Distribution by Income Level	97,448	1%	16%	56%	27%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	37,792	3%	25%	57%	15%	0%
Median Family Income	= \$58,001					
HUD Adjusted Median Family Income for 2017	= \$59,200					
Households Below the Poverty Level	=14%					
				Median Housing Value	= \$115,724	
				Unemployment Rate	= 5.22%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2017 HUD updated MFI.

Extraco's Temple AA is made up of the entire Killeen-Temple MSA, which includes Bell County, Coryell County, and Lampassas County. The bank derived 70 percent of its deposits from this AA. According to the FDIC's June 30, 2017 Deposit Market Share Report, Extraco ranked first of 20 institutions in the Temple AA with 16 percent deposit market share. During the evaluation period, Extraco originated 57 percent of its loans in this AA. The 2016 aggregate small business peer data (originations) indicates Extraco ranked sixth of 69 reporting lenders for originating small loans to businesses in the Temple AA, with 7 percent market share by number and 19 percent market share by dollar amount. Extraco operates seven full service banking locations and 15 ATMs in the Temple AA, its headquarters and largest market. Economic conditions in the area are good, with low unemployment rate of 5.22 percent. The Temple Economic Development Corporation commented current economic conditions are good and job growth has been realized in healthcare, wholesale-distribution and information technology sectors.

Waco AA

Demographic Information for Full-Scope Area: Waco Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	14% or 7	29% or 15	25% or 13	27% or 14	4% or 2
Population by Geography	409,925	2%	18%	54%	26%	1%
Owner-Occupied Housing by Geography	241,505	10%	30%	23%	35%	2%
Businesses by Geography	96,935	4%	22%	27%	46%	0%
Farms by Geography	604	2%	14%	37%	47%	0%
Family Distribution by Income Level	57,860	7%	28%	24%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	23,285	13%	42%	23%	22%	0%
Median Family Income	= \$54,026					
HUD Adjusted Median Family Income for 2017	= \$57,500					
Households Below the Poverty Level	=20%					
				Median Housing Value	= \$112,021	
				Unemployment Rate	= 3.8%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2017 HUD updated MFI.

Extraco's Waco AA is made up of the entire Waco MSA, which is comprised entirely by McLennan County. The bank derived 23 percent of deposits from this AA. According to the FDIC's June 30, 2017 Deposit Market Share Report, Extraco ranked eighth of 28 institutions in the Waco AA with 5 percent deposit market share. During the evaluation period, Extraco originated 22 percent of its loans in this AA. The 2016 aggregate small business peer data (originations) indicates Extraco ranked seventh of 67 reporting lenders for originating small loans to businesses in the Waco AA, with 4 percent market share by number and 10 percent market share by dollar amount. Extraco operates five full service banking locations and three ATMs in the Waco AA. Economic conditions in the area are good, with a low unemployment rate of 3.8 percent. The Waco Chamber of Commerce commented that there are ongoing opportunities for area lenders to support small business lending and economic revitalization in older neighborhoods such as the downtown area.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each AA within the state rating areas. For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “Aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the assessment area; (3) the “% Total” represents the percentage of all bank HMDA loans during the relevant evaluation period; (4) the “Overall Market” represents the number of loans in the relevant AA by Aggregate lenders. Tables without data are not included in this PE. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities, or made outside the bank’s assessment area, may receive positive CRA consideration.
- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution by number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding, and tracked and recorded by the bank's financial reporting system. A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of bank branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1: Lending Volume

Assessment Area	% of Rated Area Loans (#) in MA/AA*	Total Reported Loans		Home Mortgage Loans		Small Loans to Businesses		Community Development Loans		% of Rated Area Deposits in MA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:										
Temple AA	57	1,161	153,864	692	94,620	466	52,984	3	6,260	70
Waco AA	22	462	84,493	253	38,435	206	27,769	3	18,289	23
Limited Review:										
Bryan AA	12	237	68,332	139	56,338	98	11,994	0	0	2
Georgetown AA	6	132	36,503	92	26,921	39	8,282	1	1,300	2
Hamilton AA	3	59	3,055	15	664	44	2,391	0	0	2

*Source: Loans - Bank Data - 1/1/2016 to 12/31/2017; Community Development Loans - Bank Data - 11/30/2015 to 7/30/2018
Due to rounding, totals may not equal 100*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016 - 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full Review:																			
Temple AA	692	94,620	58	12,837	1	1	0	9	8	6	59	49	56	30	42	38	0	0	0
Waco AA	253	38,435	21	6,152	5	8	4	19	11	15	29	22	21	48	60	59	0	0	0
Limited Review:																			
Bryan AA	139	56,338	12	5,429	4	11	4	22	34	19	27	26	26	47	30	51	0	0	0
Georgetown AA	92	26,921	8	6,157	0	0	0	6	8	3	57	40	43	38	52	54	0	0	0
Hamilton AA	15	664	1	106	0	0	0	0	0	0	85	93	77	15	7	23	0	0	0

*Source: 2015 ACS Census; 01/01/2016 - 12/30/2017 Bank HMDA Data, 2016 - 2017 HMDA Aggregate Data
Due to rounding, totals may not equal 100*

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Full Review:																				
Temple AA	692	94,620	58	12,837	20	4	3	19	11	12	21	23	22	40	48	36	0	13	27	
Waco AA	253	38,435	21	6,152	22	2	3	18	10	10	19	16	20	41	45	48	0	27	19	
Limited Review:																				
Bryan AA	139	56,338	12	5,429	25	0	1	15	1	8	17	4	16	43	45	57	0	50	18	
Georgetown AA	92	26,921	8	6,157	14	0	3	18	16	12	23	16	22	45	57	49	0	11	14	
Hamilton AA	15	664	3	106	16	27	8	20	7	20	21	27	18	43	40	39	0	0	16	

*Source: 2015 ACS Census; 01/01/2016 - 12/30/2017 Bank HMDA Data, 2016 - 2017 HMDA Aggregate Data
Due to rounding, totals may not equal 100*

Assessment Area:	Total Small Loans to Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Businesses	% Bank Loans	Aggregate	% of Businesses	% Bank Loans	Aggregate	% of Businesses	% Bank Loans	Aggregate	% of Businesses	% Bank Loans	Aggregate	% of Businesses	% Bank Loans	Aggregate	
Full Review:																				
Temple AA	466	52,984	55	4,042	3	2	4	17	9	13	53	58	51	26	30	32	1	0	0	
Waco AA	206	27,769	24	3,123	5	5	6	27	18	27	28	21	26	40	56	41	1	0	0	
Limited Review:																				
Bryan AA	98	11,994	12	3,471	8	6	5	23	27	29	31	28	27	37	40	39	0	0	0	
Georgetown AA	39	8,282	5	2,413	0	0	0	17	18	13	40	33	43	43	49	44	0	0	0	
Hamilton AA	44	2,391	10	182	0	0	0	0	0	0	88	91	71	12	9	29	0	0	0	

*Source: 2015 ACS Census; 01/01/2016 - 12/30/2017 Bank HMDA Data, 2016 - 2017 HMDA Aggregate Data
Due to rounding, totals may not equal 100*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Temple AA	466	52,984	55	4,042	84	27	46	4	15	13	8
Waco AA	206	27,769	24	3,123	82	26	39	6	15	13	9
Limited Review:											
Bryan AA	98	11,994	12	3,471	80	29	43	5	19	15	3
Georgetown AA	39	8,282	5	2,413	86	32	41	4	12	10	6
Hamilton AA	44	2,391	10	182	84	30	45	5	10	12	10

Source: 2017 D&B Data; 01/01/2016 - 12/30/2017 Bank Sample Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100. The "% of Total" represents the share of business loan originations in this AA. The "% of Total" represents the share of business loan originations in this AA.

Assessment Area	Prior Periods		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$ (000's)	#	\$ (000's)	% Businesses	\$ (000's)	% of Total	#	\$ (000's)
Full Review:									
Temple AA	1	189	3	328	4	517	4	0	0
Waco AA	3	6,489	6	1,521	9	8,010	68	0	0
Limited Review:									
Bryan AA	0	0	1	2,000	1	2,000	17	0	0
Georgetown AA	0	0	0	0	0	0	0	0	0
Hamilton AA	0	0	0	0	0	0	0	0	0
Other Investments:									
Statewide (in Texas)	1	70	2	1,214	3	1,284	11	2	3,816

*Source: Bank Data – 11/30/2015 – 7/30/2018
Due to rounding, total may not equal 100*

Table 15: Distribution of Branch Delivery System and Branch Openings/Closings

Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Tracts (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Temple AA	70	7	47	0	30	30	40	0	1	0	-1	0	0	2	18	54	26
Waco AA	23	4	27	0	50	25	25	0	1	0	0	-1	0	10	31	24	35
Limited Review:																	
Bryan AA	2	1	7	0	100	0	0	0	0	0	0	0	0	13	37	22	28
Georgetown AA	2	1	7	0	0	100	0	0	0	0	0	0	0	0	11	52	37
Hamilton AA	2	1	7	0	0	100	0	0	0	0	0	0	0	0	0	73	27
<i>Source: Bank Data – 7/30/2018, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.</i>																	