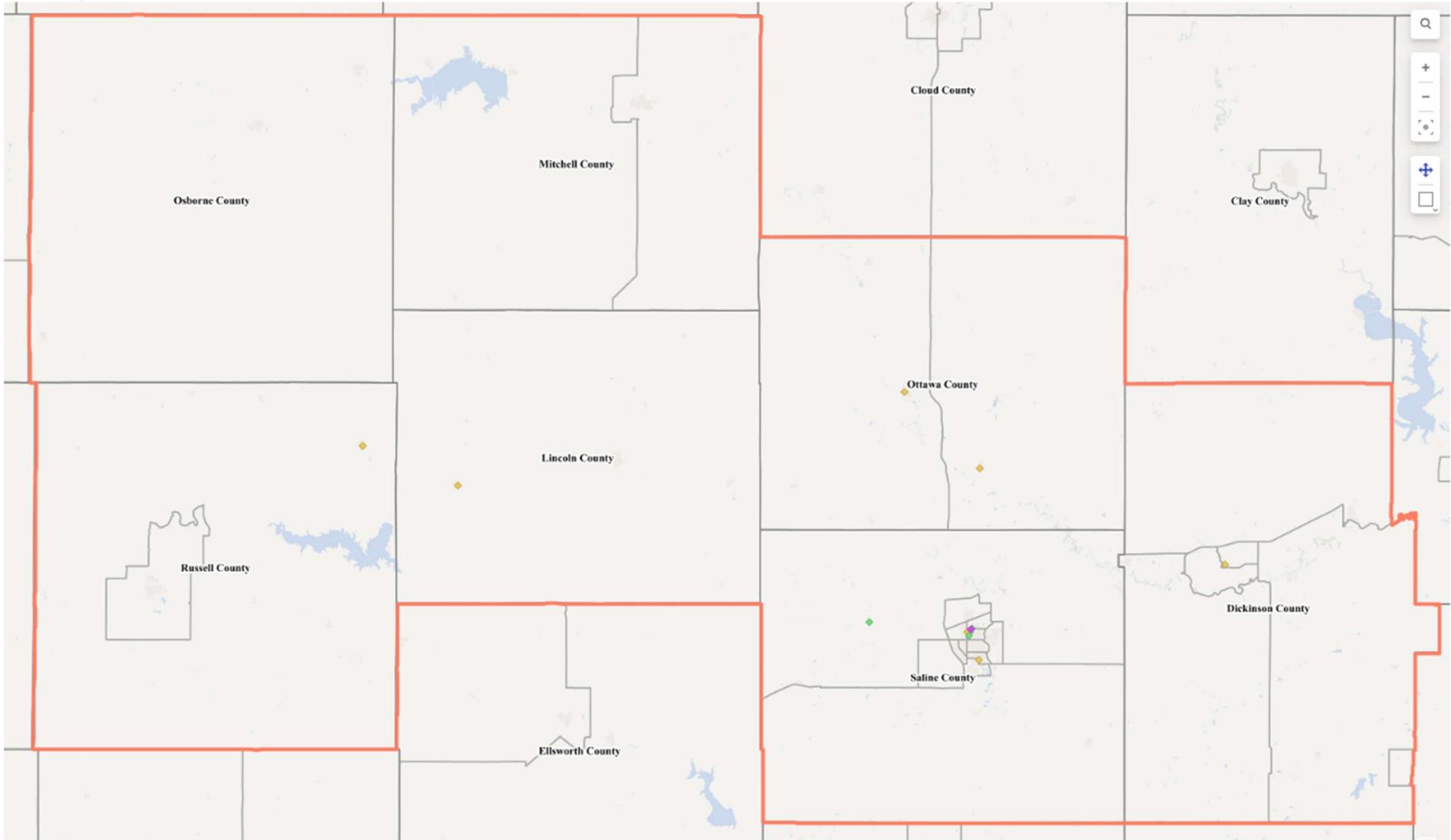




COMMUNITY REINVESTMENT  
ACT PUBLIC FILE

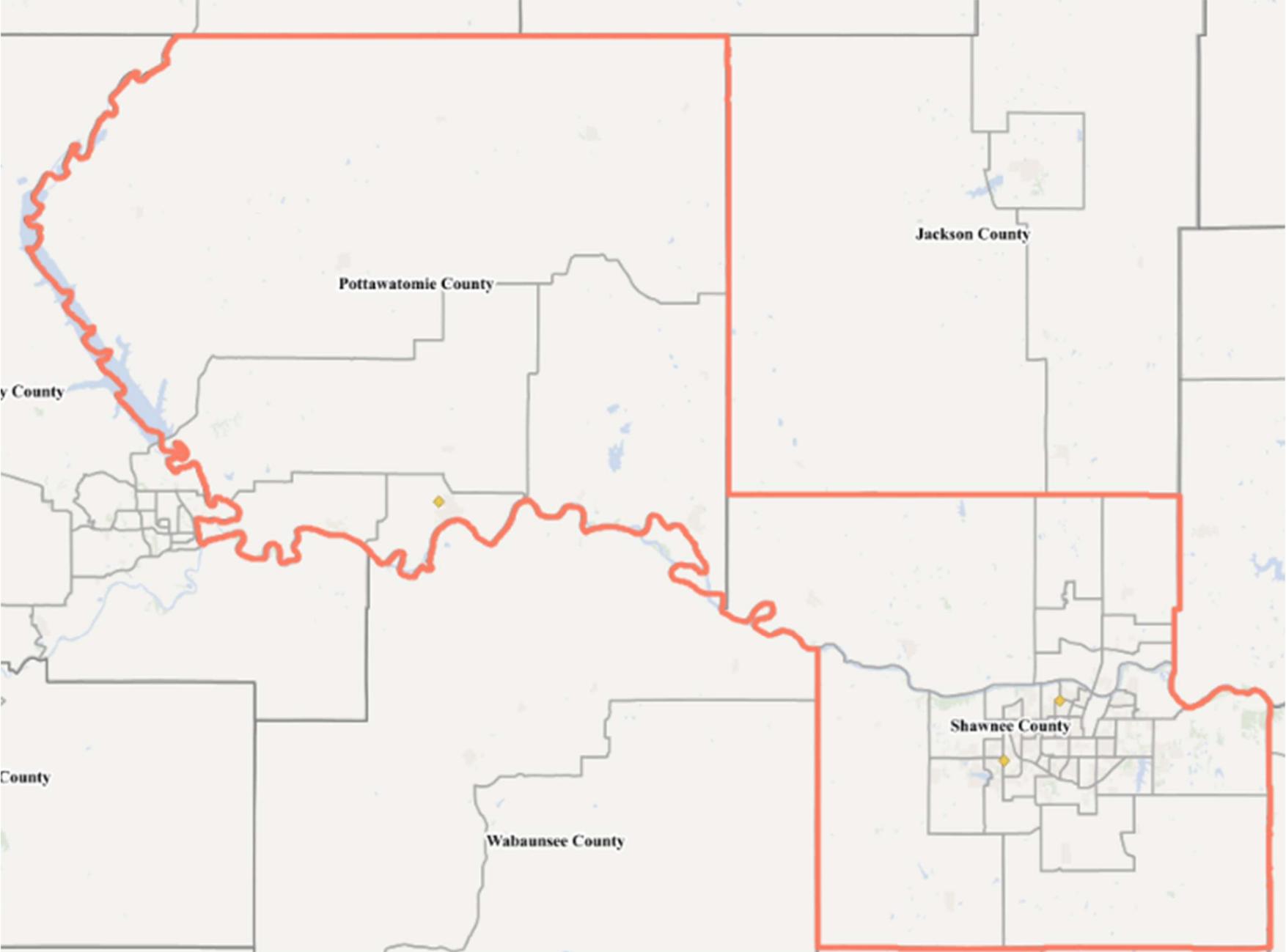
# Assessment Areas

Bennington State Bank – Salina Assessment Area – Saline Co., Dickinson Co., Ottawa Co., Lincoln Co., Russell Co., Osborne Co., Mitchell Co.



County	Census Tract	Tract Income
Dickinson KS	0841.00	Middle
Dickinson KS	0842.00	Upper
Dickinson KS	0843.00	Middle
Dickinson KS	0844.00	Middle
Dickinson KS	0845.00	Middle
Dickinson KS	0846.00	Middle
Lincoln KS	0861.00	Middle
Mitchell KS	1766.00	Middle
Mitchell KS	1767.00	Middle
Osborne KS	4741.00	Middle
Ottawa KS	0856.00	Upper
Ottawa KS	0857.00	Middle
Russell KS	9738.00	Middle
Russell KS	9739.00	Middle
Saline KS	0001.01	Mod
Saline KS	0001.02	Mod
Saline KS	0002.00	Mod
Saline KS	0003.00	Mod
Saline KS	0004.00	Mod
Saline KS	0005.00	Middle
Saline KS	0006.00	Middle
Saline KS	0007.00	Upper
Saline KS	0008.00	Middle
Saline KS	0009.00	Middle
Saline KS	0010.00	Upper
Saline KS	0011.00	Upper
Saline KS	0012.00	Middle

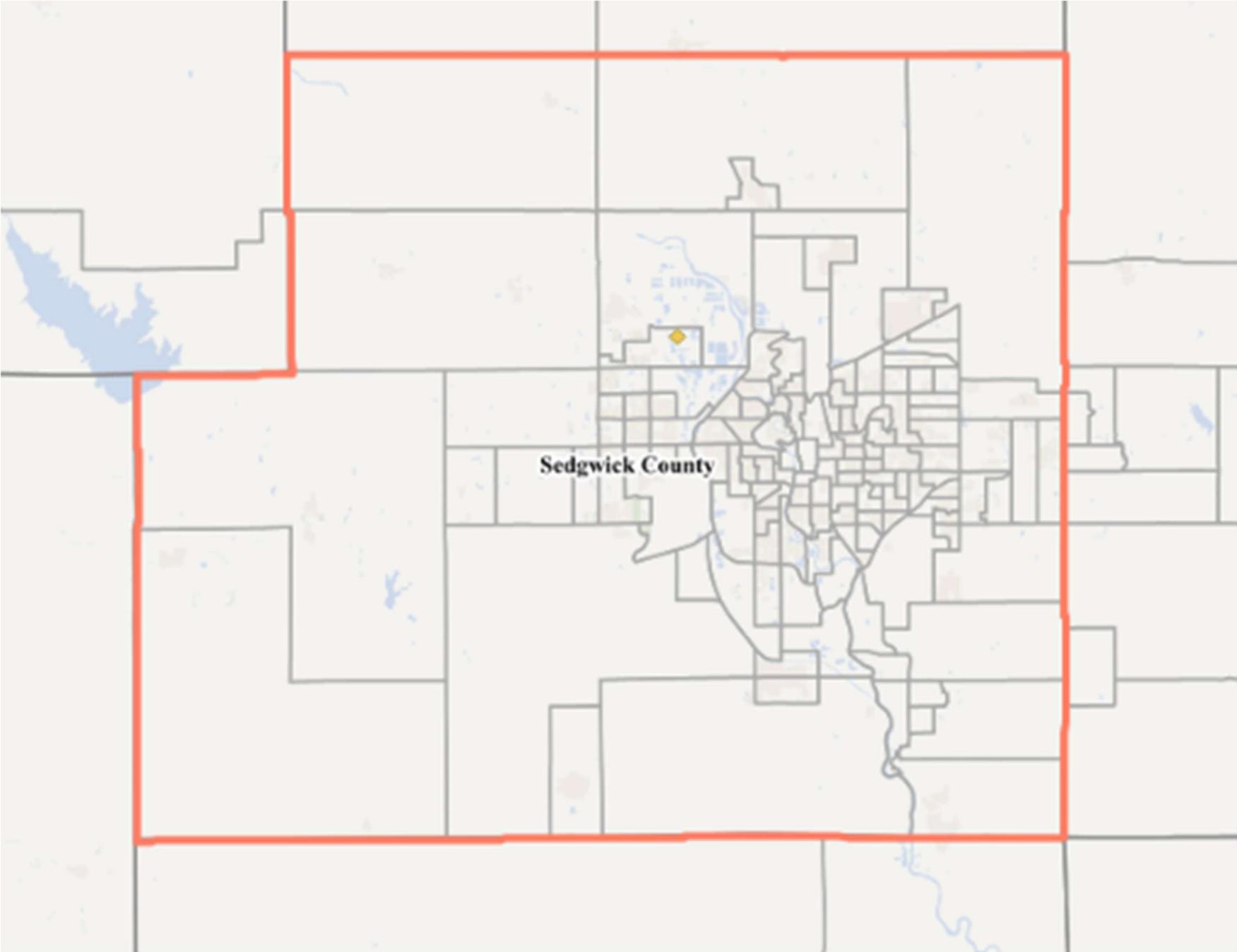
**Bennington State Bank – Wamego/Topeka Assessment Area – Pottawatomie Co. & Shawnee Co**



County	Census Tract	Tract Income
Pottawatomie KS	0001.01	Middle
Pottawatomie KS	0001.02	Upper
Pottawatomie KS	0002.00	Upper
Pottawatomie KS	0003.00	Middle
Pottawatomie KS	0004.00	Middle
Shawnee KS	0004.00	Low
Shawnee KS	0005.00	Low
Shawnee KS	0006.00	Mod
Shawnee KS	0007.00	Middle
Shawnee KS	0008.00	Mod
Shawnee KS	0009.00	Middle
Shawnee KS	0010.00	Mod
Shawnee KS	0011.00	Low
Shawnee KS	0012.00	Mod
Shawnee KS	0013.00	Mod
Shawnee KS	0015.00	Middle
Shawnee KS	0016.01	Middle
Shawnee KS	0016.03	Middle
Shawnee KS	0016.04	Middle
Shawnee KS	0018.00	Middle
Shawnee KS	0019.00	Middle
Shawnee KS	0021.00	Mod
Shawnee KS	0022.00	Middle
Shawnee KS	0024.01	Middle
Shawnee KS	0024.02	Middle
Shawnee KS	0025.00	Middle

County	Census Tract	Tract Income
Shawnee KS	0026.01	Middle
Shawnee KS	0026.02	Upper
Shawnee KS	0027.01	Mod
Shawnee KS	0027.02	Middle
Shawnee KS	0028.00	Mod
Shawnee KS	0029.00	Low
Shawnee KS	0030.01	Mod
Shawnee KS	0030.02	Middle
Shawnee KS	0031.00	Mod
Shawnee KS	0033.01	Middle
Shawnee KS	0033.02	Upper
Shawnee KS	0034.01	Upper
Shawnee KS	0034.02	Upper
Shawnee KS	0035.00	Upper
Shawnee KS	0036.01	Middle
Shawnee KS	0036.04	Upper
Shawnee KS	0036.05	Upper
Shawnee KS	0036.06	Middle
Shawnee KS	0036.07	Upper
Shawnee KS	0037.01	Middle
Shawnee KS	0037.02	Middle
Shawnee KS	0039.01	Upper
Shawnee KS	0039.02	Middle
Shawnee KS	0040.00	Mod
Shawnee KS	0041.00	Middle

**Bennington State Bank – Wichita Assessment Area – Sedgwick County**



County	Census Tract	Tract Income
Sedgwick KS	0001.00	Mod
Sedgwick KS	0002.00	Middle
Sedgwick KS	0003.00	Mod
Sedgwick KS	0004.00	Mod
Sedgwick KS	0006.00	Low
Sedgwick KS	0007.00	Mod
Sedgwick KS	0008.00	Low
Sedgwick KS	0009.00	Mod
Sedgwick KS	0010.00	Mod
Sedgwick KS	0011.00	Mod
Sedgwick KS	0014.00	Middle
Sedgwick KS	0015.00	Mod
Sedgwick KS	0018.00	Low
Sedgwick KS	0019.00	Middle
Sedgwick KS	0020.00	Upper
Sedgwick KS	0022.00	Upper
Sedgwick KS	0023.00	Mod
Sedgwick KS	0024.00	N/A
Sedgwick KS	0026.00	Mod
Sedgwick KS	0027.00	Low
Sedgwick KS	0028.00	Mod
Sedgwick KS	0029.00	Middle
Sedgwick KS	0030.00	Mod
Sedgwick KS	0031.00	Mod
Sedgwick KS	0032.00	Mod
Sedgwick KS	0034.00	Mod
Sedgwick KS	0035.00	Mod
Sedgwick KS	0036.00	Mod
Sedgwick KS	0037.00	Low
Sedgwick KS	0038.00	Mod
Sedgwick KS	0039.00	Mod
Sedgwick KS	0040.00	Mod
Sedgwick KS	0043.01	Upper
Sedgwick KS	0043.02	N/A
Sedgwick KS	0051.00	Mod
Sedgwick KS	0052.00	Mod
Sedgwick KS	0053.00	Middle
Sedgwick KS	0054.01	Middle
Sedgwick KS	0054.02	Mod

County	Census Tract	Tract Income
Sedgwick KS	0055.01	Middle
Sedgwick KS	0055.02	Middle
Sedgwick KS	0056.00	Mod
Sedgwick KS	0057.00	Middle
Sedgwick KS	0058.00	Mod
Sedgwick KS	0059.00	Mod
Sedgwick KS	0060.00	Mod
Sedgwick KS	0061.00	Mod
Sedgwick KS	0062.00	Mod
Sedgwick KS	0063.00	Middle
Sedgwick KS	0064.00	Middle
Sedgwick KS	0065.00	Low
Sedgwick KS	0066.00	Middle
Sedgwick KS	0067.00	Middle
Sedgwick KS	0068.00	Low
Sedgwick KS	0069.00	Mod
Sedgwick KS	0070.00	Mod
Sedgwick KS	0071.01	Mod
Sedgwick KS	0071.02	Middle
Sedgwick KS	0072.01	Upper
Sedgwick KS	0072.05	Middle
Sedgwick KS	0072.06	Upper
Sedgwick KS	0072.07	Upper
Sedgwick KS	0072.08	Middle
Sedgwick KS	0073.01	Upper
Sedgwick KS	0073.02	Upper
Sedgwick KS	0075.00	Mod
Sedgwick KS	0076.00	Middle
Sedgwick KS	0077.01	Middle
Sedgwick KS	0077.02	Middle
Sedgwick KS	0078.00	Low
Sedgwick KS	0080.00	Middle
Sedgwick KS	0081.00	Middle
Sedgwick KS	0082.00	Mod
Sedgwick KS	0083.00	Middle
Sedgwick KS	0084.00	Middle
Sedgwick KS	0085.00	Middle
Sedgwick KS	0086.00	Middle
Sedgwick KS	0087.00	Mod

County	Census Tract	Tract Income
Sedgwick KS	0088.00	Middle
Sedgwick KS	0089.00	Mod
Sedgwick KS	0090.00	Middle
Sedgwick KS	0091.00	Middle
Sedgwick KS	0092.00	Middle
Sedgwick KS	0093.01	Mod
Sedgwick KS	0093.03	Middle
Sedgwick KS	0093.04	Mod
Sedgwick KS	0094.01	Middle
Sedgwick KS	0094.02	Middle
Sedgwick KS	0095.04	Middle
Sedgwick KS	0095.05	Upper
Sedgwick KS	0095.06	Upper
Sedgwick KS	0095.07	Upper
Sedgwick KS	0095.08	Middle
Sedgwick KS	0095.09	Upper
Sedgwick KS	0095.10	Upper
Sedgwick KS	0095.11	Middle
Sedgwick KS	0095.12	Upper
Sedgwick KS	0095.13	Middle
Sedgwick KS	0095.14	Upper
Sedgwick KS	0095.15	Upper
Sedgwick KS	0096.03	Middle
Sedgwick KS	0096.04	Middle
Sedgwick KS	0096.05	Upper
Sedgwick KS	0097.00	Upper
Sedgwick KS	0098.01	Mod
Sedgwick KS	0098.03	Middle
Sedgwick KS	0098.04	Upper
Sedgwick KS	0099.01	Upper
Sedgwick KS	0099.02	Middle
Sedgwick KS	0100.01	Upper
Sedgwick KS	0100.02	Upper
Sedgwick KS	0100.03	Middle
Sedgwick KS	0100.05	Middle
Sedgwick KS	0100.06	Middle
Sedgwick KS	0100.07	Upper
Sedgwick KS	0101.06	Middle
Sedgwick KS	0101.07	Middle

County	Census Tract	Tract Income
Sedgwick KS	0101.08	Upper
Sedgwick KS	0101.09	Mod
Sedgwick KS	0101.10	Upper
Sedgwick KS	0101.11	Upper
Sedgwick KS	0101.13	Upper
Sedgwick KS	0101.15	Upper
Sedgwick KS	0101.16	Upper
Sedgwick KS	0102.01	Middle
Sedgwick KS	0102.02	Middle
Sedgwick KS	0103.01	Upper
Sedgwick KS	0103.02	Upper
Sedgwick KS	0104.00	Middle
Sedgwick KS	0105.00	Upper
Sedgwick KS	0106.00	Upper
Sedgwick KS	0107.00	Middle
Sedgwick KS	0108.01	Mod
Sedgwick KS	0108.02	Mod
Sedgwick KS	0109.00	Upper

# Branch Listing

## Salina, Kansas Ohio

2130 South Ohio Street  
Salina, KS 67401  
Census Tract: 0007.00

### Lobby Hours:

M-F 9:00-4:30

### Drive-Up Hours:

M-F 7:30-5:30  
Sat 8:30-12:30  
Phone No. 785-827-5522  
Fax No. 785-827-7577  
ATM Available

## Salina, Kansas 9th

200 South 9th Street  
Salina, KS 67401  
Census Tract: 0003.00

### Lobby Hours:

M-F 9:00-4:30

### Drive-Up Hours:

M-F 7:30-5:30  
Sat 8:30-12:30  
Phone No. 785-827-1264  
Fax No. 785-827-7324  
ATM Available

## Abilene, Kansas

416 Northwest 3<sup>rd</sup> Street  
Abilene, KS 67410  
Census Tract: 0844.00

### Lobby Hours:

M-F 9:00-3:00

### Drive-Up Hours:

M-F 8:00-5:00  
Phone No. 785-571-9226  
Fax No. 785-404-2551

## Bennington, Kansas

104 West Washington Street  
Bennington, KS 67422  
Census Tract: 0856.00

### Lobby Hours:

M-F 9:00-3:00

### Drive-Up Hours:

M-F 8:00-5:00  
Phone No. 785-488-3344  
Fax No. 785-488-3347  
ATM Available

## Minneapolis, Kansas

320 West 2nd Street  
Minneapolis, KS 67467  
Census Tract: 0857.00

### Lobby Hours:

M-F 9:00-3:00

### Drive-Up Hours:

M-F 8:00-5:00  
Phone No. 785-392-2136  
Fax No. 785-392-2139  
ATM Available

## Sylvan Grove, Kansas

102 North Main Street  
Sylvan Grove, KS 67481  
Census Tract: 0861.0

### Lobby Hours:

M-F 9:00-3:00

### Drive-Up Hours:

M-F 8:00-5:00  
Phone No. 785-526-7155  
Fax No. 785-526-7158  
ATM Available

## Lucas, Kansas

132 South Main Street  
Lucas, KS 67648  
Census Tract: 9739.00

### Lobby Hours:

M-F 9:00-3:00

### Drive-Up:

M-F 8:00-5:00  
Phone No. 785-525-6445  
Fax No. 785-525-6186  
ATM Available

## Wamego, Kansas

1210 Commerce Drive  
Wamego, KS 66547  
Census Tract: 0002.00

### Lobby Hours:

M-F 9:00-3:00

Sat By Appointment

### Drive-Up Hours:

M-F 7:30-5:30  
Sat 8:00-12:00  
Phone No. 785-456-1806  
Fax No. 785-456-1807  
ATM Available

**Topeka, Kansas Wanamaker**

3001 SW Wanamaker Rd.  
Topeka, KS 66614  
Census Tract: 0036.05  
Lobby Hours:  
M-F 9:00-4:00  
Drive-Up Hours:  
M-F 8:00-5:30  
Sat 9:00 – 12:00  
Phone No. 785-271-1800  
Fax No. 785-271-2111  
ATM Available

**Topeka, Kansas MacVicar**

2620 SW 6<sup>th</sup> Ave., Suite A  
Topeka, KS 66606  
Census Tract: 0041.00  
Lobby Hours:  
M-F 9:00 – 4:00  
Open by Appointment  
Drive-Up Hours:  
M-F 8:00 – 5:00  
Phone No. 785-228-8346  
Fax No. 785-357-4341  
ATM Available

**Wichita, Kansas**

3954 N. Ridge Rd.  
Wichita, KS 67205  
Census Tract: 0103.01  
Lobby Hours:  
M-F 8:00-4:30  
Drive-Up Hours:  
M-F 8:00-5:00  
Phone No. 316-867-4711  
Fax No. 785-462-5704  
ATM Available

**Off Premise ATMs**

Rolling Hills Zoo  
625 N. Hedville Road Salina, KS  
Census Tract: 0011.00

Salina Regional Health Center  
400 S Santa Fe Salina, KS  
Census Tract: 0001.01

Saline County Building  
300 W Ash St Salina, KS  
Census Tract: 0001.02

**Administrative Office**

201 E. Iron Ave.  
Salina, KS 67401  
Census Tract: 0001.02  
Lobby Hours:  
M-F 9:00 – 4:30  
Phone No. 785-827-5522  
Fax No. 785-827-7577

# Home Mortgage Disclosure Act Data (HMDA)



Bennington State Bank's (BSB) HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's Website at [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)

## Public Comments



No public comments have been made during the current period.

## Loan to Deposit Ratios



### 2025

March 31 <sup>st</sup>	79.74%
June 30 <sup>th</sup>	82.53%
September 30 <sup>th</sup>	80.34%
December 31 <sup>st</sup>	76.93%

# Branch Opening & Closing Record



## **Branches Opened:**

**November 2024**

### **Topeka, KS**

30010 SW Wanamaker Rd

Topeka, KS 66614

Census Tract: 0036.05

Lobby Hours:

M-F 9:00-4:00

Drive-Up Hours:

M-F 8:00-5:30

Sat 9:00-12:00

Phone No. 785-271-1800

Fax No. 785-271-2111

### **Topeka, KS**

2620 SW 6<sup>th</sup> Ave., Suite A

Topeka, KS 66606

Census Tract: 0041.00

Lobby Hours:

M-F 9:00-4:00

Open by Appointment

Drive-Up Hours:

M-F 8:00-5:00

Phone No. 785-228-8346

Fax No. 785-357-4341

## **Branches Closed:**

None

# Products & Services



## Consumer Deposit Products

### **Bronze Checking**

- No monthly service fee or minimum monthly balance
- \$100 minimum opening balance
- BSB Visa Debit Card is provided without a fee to personal checking account holders
- Online & Mobile banking is available to account holders subject to approval. You may also sign up for Online Bill Pay to easily pay bills and expenses
- You will receive a paper statement each month unless you sign up for electronic paperless E-statements. Electronic statements require a valid E-mail address
- This is a NON-interest bearing account
- No transaction limits on this account
- Access to 3 deals with local merchants with BaZing

### **Silver Checking**

- This account requires a \$6.00 monthly service fee
- \$100 minimum opening balance
- This is a NON-interest bearing account
- BSB Visa Debit Card is provided without a fee to personal checking account holders
- Online & Mobile banking is available to account holders subject to approval. You may also sign up for Online Bill Pay to easily pay bills and expenses
- You will receive a paper statement each month unless you sign up for electronic paperless E-statements. Electronic statements require only a valid E-mail address
- No transaction limits on this account
- Added account features:
  - BaZing Savings
  - Cell Phone Protection
  - Identity Theft Protection
  - Roadside Assistance
  - \$10,000 Travel Accidental Death Coverage
  - Pharmacy, Vision, and Hearing Savings

### **Gold Checking**

- This account requires a \$500 minimum monthly balance to avoid an \$8.00 monthly service charge
- Interest bearing account
- \$100 minimum opening balance
- BSB Visa Debit Card is provided without a fee to personal checking account holders
- Online & Mobile banking is available to account holders subject to approval. You may also sign up for Online Bill Pay to easily pay bills and expenses
- You will receive a paper statement each month unless you sign up for electronic paperless E-statements. Electronic statements require only a valid E-mail address.
- This is an interest-bearing checking account. Your account will earn the disclosed annual percentage yield on the full amount of principal at all times. At our discretion, we may change this rate at any time. No transaction limits on this account
- Current Rates will be provided upon request
- Added account features:
  - BaZing Savings
  - Cell Phone Protection
  - Identity Theft Protection
  - Roadside Assistance
  - \$10,000 Travel Accidental Death Coverage
  - Pharmacy, Vision, and Hearing Savings

### **Money Market Account**

- This account requires a \$2,500 minimum monthly balance to avoid a \$10.00 monthly service charge
- Interest bearing account
- \$2,500 minimum opening balance
- Interest accrues based on 2 tiers: (1) up to \$24,999.99 and (2) \$25,000 and up. Your account will earn the disclosed annual percentage yield on the full amount of principal at all times. At our discretion, we may change this rate at any time
- Current Rates will be provided upon request
- You will receive a paper statement each month unless you sign up for electronic paperless E-statements. Electronic statements require only a valid E-mail address

### **Savings Accounts**

- \$50 minimum opening balance
- Online & Mobile banking is available to account holders subject to approval. You may also sign up for Online Bill Pay to easily pay bills and expenses
- Interest-bearing account. You must maintain \$100 balance to obtain disclosed annual percentage yield. At our discretion, we may change this rate at any time
- You will be mailed a paper account statement quarterly unless you have electronic transactions, if so you will receive your statements monthly. You can also sign up for electronic paperless E-statements. Electronic statements require only a valid E-mail address
- Current Rates will be provided upon request.

### **Christmas Club Savings**

- \$50 minimum opening balance
- Max balance allowed is \$249,999.99
- Monthly automatic deposit of at least \$25.00 required
- Combined statement required with automatic transfer account
- Interest-bearing account. You must maintain \$100 balance to obtain disclosed annual percentage yield. At our discretion, we may change this rate at any time
- Annual disbursement to automatic transfer account will begin November 6, of current year and continue annually thereafter until account is closed
- Current Rates will be provided upon request.

### **Other Deposit Accounts**

- Certificates of Deposit
- Health Savings Accounts (Checking and Money Market)
- Individual Retirement Accounts
  - Traditional IRA
  - Roth IRA



# ROUND IT UP SAVINGS

## Save money without thinking about it!

1. Open a Round It Up Savings Account
2. Sign up for the Round It Up Savings Program
3. SHOP, SWIPE, AND SAVE!



### Save on Autopilot

Grow your savings each time you use your Bennington State Bank Debit Card!



## 5.10% APY\*

Annual Percentage Yield

Save smart with big results!



## SHOP

Shop anywhere using your Bennington State Bank Debit Card and watch your savings grow automatically!



## SWIPE

We round up the transaction amount to the nearest whole dollar and the difference is transferred from your BSB checking account into your "Round It Up" Savings Account.\*\*



## SAVE BIG

Earn an incredible

**5.10% APY\***  
on your "Round It Up" Savings Account!

Save money effortlessly with Round It Up!

\*\*Only deposits from round up transactions are allowed.

\*Interest rate may change at bank's discretion. The annual percentage yield is accurate as of June 20, 2022. No minimum balance required to obtain the advertised annual percentage yield. No minimum opening deposit. Fees could reduce earnings.

THE  
**BENNINGTON  
STATE BANK**



[bsbks.com](https://www.bsbks.com)

1-888-827-1887



# TANDEM SAVINGS

ENJOY LIQUIDITY  
& HIGH YIELD!

# 4.05%

APY\*

Annual Percentage Yield

## High Yield Savings Account

OPEN A NEW CD AND BE ELIGIBLE FOR A HIGH INTEREST SAVINGS ACCOUNT

### TANDEM SAVINGS BENEFITS:

- ✓ Simple savings account delivering a higher yield
- ✓ Earns competitive 4.05% APY\*
- ✓ Open any term CD with a minimum balance of \$1,000, and you are eligible to open a Tandem Savings account

### ACCOUNT DETAILS:

- ✓ Tandem Savings requires a deposit that is equal to or less than the CD amount
- ✓ Minimum balance to open is \$1,000
- ✓ Tandem Savings account must be opened the same day as CD
- ✓ No withdrawal limit
- ✓ We offer certificates of deposit with annual percentage yields that depend on the maturity you choose

\*Annual percentage yield is accurate as of June 12, 2023. A minimum balance of \$1,000 is required to obtain the advertised APY. Fees could reduce the earnings on this account. Early withdrawal penalties may apply.

THE  
BENNINGTON  
STATE BANK

Member  
FDIC



[bsbks.com](https://bsbks.com)

1-888-827-1887

## Business Deposit Products

### **Small Business Checking**

Designed for businesses with low to moderate transaction activity

- \$100 minimum opening deposit
- \$10 maintenance fee per statement cycle if the average daily balance for the cycle falls below \$750
- 100 free paper items per month, \$.15 per item over 100
- Free eStatements
- \$5 per month for paper statements

### **Regular Business Checking**

- \$100 minimum opening deposit
- \$10 monthly maintenance fee
- \$.10 per paper debit item
- \$.05 per paper deposit item
- .25% earnings credit on investable balance

### **Business Savings Account**

- No monthly maintenance fee for \$50 minimum balance
- \$6 semi-annual maintenance fee when average daily balance falls below \$50
- Unlimited deposits and withdrawals
- Competitive discretionary interest rate

### **Additional Business Services**

- ACH Origination \$25 monthly fee – Same day ACH \$10 additional monthly fee
- Wire transfer – Incoming: Domestic \$10; International \$25
- Wire transfer – Outgoing: Domestic \$20; International \$52.50
- Positive Pay – no cost
- Business debit card
- Sweep - \$25 monthly fee
- Repurchase Agreements available upon request
- Remote deposit capture - \$25 monthly maintenance fee, additional equipment fees may apply
- Lockbox
- Merchant Services

## Other Services

<ul style="list-style-type: none"> <li>• ATMs</li> <li>• Cash Advance</li> <li>• Credit Life and A&amp;H Insurance</li> <li>• Debit Cards</li> <li>• Internet Banking</li> <li>• Internet Bill Pay</li> <li>• Apple/Android Application</li> <li>• Loan Escrow for Taxes and Insurance</li> </ul>	<ul style="list-style-type: none"> <li>• Mobile Banking</li> <li>• Monetary Instruments</li> <li>• Night Deposit</li> <li>• Redeem Savings Bonds</li> <li>• Safe Deposit Box</li> <li>• Telephone Banking</li> <li>• VISA Gift Cards</li> <li>• Wire Transfers</li> </ul>
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## Other Fees

Garnishment (Court Order or Levy Process)	\$10.00	Domestic Wire Transfer – Outgoing	\$20.00
ACH Transfer	\$2.00	Domestic Wire Transfer – Incoming	\$10.00
Collection Item – Domestic	\$5.00	Foreign Wire Transfer- Outgoing	\$52.50
Collection Item - Foreign	\$10.00	Foreign Wire Transfer – Incoming	\$25.00
Deposit Item Return – Domestic	\$2.00	Account Statement Copies	\$2.00
Deposit Item Return – Foreign	\$40.00	Account History	\$1.00
Stop Payment (Per Item)	\$30.00	Acct. Balance & Reconciliation	\$20 per hour
Debit Card Replacement	\$7.00	Cashier’s Check	\$5.00
ATM Charges (Non BSB/All-Point Network)	\$.075	Indemnity Bond for Lost or Stolen Cashier’s Check	\$25.00
Overdraft Charge	\$30.00	Money Order	\$3.00
Non-Sufficient Funds (NSF) per presentment	\$30.00	Gift Order Activation	\$3.00
Automatic Transfer Protection (per transfer)	\$5.00	FAX – Incoming	\$1.00
Dormant Account (fee per month)	\$5.00	FAX – Outgoing	\$5 first page, \$1 each addtl. Page
Online Banking Password Reset	\$5.00	Safe Deposit Box	Inquire at Branch

## Loan Products

<p><b><u>Commercial Loans</u></b></p> <ul style="list-style-type: none"> <li>• Accounts Receivable</li> <li>• Floor Plan</li> <li>• Inventory</li> <li>• Machinery &amp; Equipment</li> <li>• Operating</li> </ul>	<p><b><u>Consumer Loans</u></b></p> <ul style="list-style-type: none"> <li>• Debt Consolidation</li> <li>• Personal</li> <li>• Vehicle/Recreational</li> </ul>
<p><b><u>Real Estate Loans</u></b></p> <ul style="list-style-type: none"> <li>• Agriculture</li> <li>• Commercial</li> <li>• Residential Dwelling</li> <li>• Construction</li> <li>• Home Equity Line of Credit</li> <li>• Multi-Family Dwelling</li> <li>• Investment Property</li> <li>• Secondary Market <ul style="list-style-type: none"> <li>▪ Conventional</li> <li>▪ FHA</li> <li>▪ Veteran Affairs</li> <li>▪ Rural Development</li> </ul> </li> </ul>	<p><b><u>Agricultural Loans</u></b></p> <ul style="list-style-type: none"> <li>• Crop</li> <li>• Livestock</li> <li>• Machinery &amp; Equipment</li> <li>• Operating</li> </ul>
<p><b><u>Additional Loan Programs Offered</u></b></p> <ul style="list-style-type: none"> <li>• Farm Service Agency (FSA)</li> <li>• Small Business Administration (SBA)</li> <li>• FHLB Affordable Housing Program</li> <li>• FHLB Rural First Time Home Buyer Program</li> <li>• Other FHLB Grants</li> <li>• BSB Affordable Housing</li> </ul>	

## BSB Trust & Wealth Management

- **NOT FDIC INSURED, NOT DEPOSITS OF THE BANK, NOT GUARANTEED, are subject to investment risks, including the possible loss of principal invested.**
- Personalized investment and management plans to fit each customer's specific needs and goals including:

<ul style="list-style-type: none"> <li>▪ Investment Management</li> <li>▪ Employee Benefit Plans</li> <li>▪ Individual Retirement Accounts (IRA)</li> <li>▪ Custodial Accounts</li> </ul>	<ul style="list-style-type: none"> <li>▪ Trust Administration</li> <li>▪ Estate Planning &amp; Settlement</li> <li>▪ Retirement Planning</li> </ul>
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# CRA Performance Evaluation



The Public Disclosure from Bennington State Bank's August 7, 2023 CRA Performance Evaluation is attached following this page.

# **PUBLIC DISCLOSURE**

August 7, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Bennington State Bank  
Certificate Number: 16402

2130 South Ohio Street  
Salina, Kansas 67401

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

1100 Walnut Street, Suite 2100  
Kansas City, Missouri 64106

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

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## INSTITUTION RATING

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

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

The Bennington State Bank's Community Reinvestment Act (CRA) performance under the Lending Test and Community Development Test supports the rating. The following points summarize the bank's Lending Test and Community Development Test performance.

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and the credit needs of the assessment areas.
- A majority of the small business, home mortgage, and small farm loans are inside the bank's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects reasonable penetration among businesses and farms of different revenue sizes and individuals of different income levels.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

**The Community Development Test is rated Satisfactory.**

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

## DESCRIPTION OF INSTITUTION

The Bennington State Bank is a full-service community bank headquartered in Salina, Kansas, and it is wholly-owned by Berco, Inc., in Salina, Kansas. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation dated August 3, 2020, based on Interagency Intermediate Small Institution Examination Procedures.

The Bennington State Bank operates nine full-service branches in central Kansas. Since the previous evaluation, the bank opened one branch in Abilene, Kansas, and another branch in

Wichita, Kansas. Neither branch is located in a low- or moderate-income census tract. The institution offers traditional loan products, including commercial, agricultural, home mortgage, and consumer loans. Commercial loans are the bank’s primary focus, although notable levels of home mortgage and agricultural loans are originated as well. This is a change from the prior evaluation, where agricultural loans were the bank’s primary focus.

The bank was also an active originator of loans under the Small Business Administration’s Paycheck Protection Program (PPP), which was established in 2020 to provide relief to small businesses during the Coronavirus Disease 2019 pandemic. The bank originated 694 PPP loans totaling \$21.3 million during the evaluation period.

The Bennington State Bank provides a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposit. Alternative banking services include internet and mobile banking, electronic bill pay, and eight cash dispensing bank-owned ATMs. In addition, the bank is a member of a third-party network that provides customers with access to thousands of surcharge-free ATMs across the county.

According to the June 30, 2023 Reports of Condition and Income, the institution reported total assets of \$987 million, total loans of \$676 million, and total deposits of \$840 million. The following table shows the distribution for each loan category by dollar volume. The largest component of the loan portfolio is commercial loans at 36.6 percent. This is followed by home mortgage loans at 32.9 percent, and agricultural loans at 20.8 percent.

<b>Loan Portfolio Distribution as of 6/30/2023</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	56,763	8.4
Secured by Farmland	124,498	18.4
Secured by 1-4 Family Residential Properties	176,923	26.2
Secured by Multifamily (5 or more) Residential Properties	45,198	6.7
Secured by Nonfarm Nonresidential Properties	160,272	23.7
<b>Total Real Estate Loans</b>	<b>563,654</b>	<b>83.4</b>
Commercial and Industrial Loans	87,510	12.9
Agricultural Production and Other Loans to Farmers	15,911	2.4
Consumer Loans	6,275	0.9
Obligations of State and Political Subdivisions in the U.S.	839	0.1
Other Loans	278	0.0
Lease Financing Receivable (net of unearned income)	1,847	0.3
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>676,314</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet the credit needs of the assessment areas.

## DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The Bennington State Bank designated the following three assessment areas in central Kansas: the Salina Assessment Area, the Wamego Assessment Area, and the Wichita Assessment Area. Since the prior evaluation, the bank expanded the Salina Assessment Area to include Dickinson County after the opening of the Abilene branch. Additionally, the bank added the Wichita Assessment Area after the opening of the Wichita branch.

## SCOPE OF EVALUATION

### **General Information**

This evaluation covers the period from the prior evaluation dated August 3, 2020, to the current evaluation dated August 7, 2023. Examiners used Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's CRA performance. These procedures include the Lending Test and the Community Development Test, which are described in the Appendix. Banks must achieve at least a Satisfactory rating under each Test to obtain an overall Satisfactory rating.

The Salina Assessment Area received a full-scope review and carried the most weight in the analysis as it represents the majority of the bank's lending, deposits, and branches. The Wamego Assessment Area received a limited-scope review since the bank has one branch in this area, and the bank's operations represent a much smaller portion of the overall lending and deposit activity. Finally, although the Wichita Assessment Area is similar to the Wamego Assessment Area in both lending and branch activity, it received a full-scope review since it is new since the prior evaluation.

### **Activities Reviewed**

Examiners determined the bank's major product lines include commercial, home mortgage, and agricultural loans. This conclusion considered the bank's business strategy, and the number and dollar volume of loans originated during the evaluation period. Given the bank's business strategy and the greater proportion of small business lending compared to other loan categories, small business lending received more weight when deriving conclusions. Small farm lending is not a product focus for the Wamego and Wichita Assessment Areas given the credit needs of those areas. Therefore, examiners did not evaluate small farm lending for the Wamego and Wichita Assessment Areas.

For small business and small farm loans, examiners reviewed all loans originated in 2022 since management indicated the bank's lending patterns for that year were reasonably representative of the bank's overall lending patterns since the previous evaluation. In 2022, the bank's lending consisted of 217 small business loans totaling \$47.3 million, and 273 small farm loans totaling \$26.9 million.

For home mortgage loans, examiners reviewed all loans reported on the bank's 2020, 2021, and 2022 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. This consisted of 391 home mortgage loans totaling \$67.5 million in 2020, 414 home mortgage loans totaling \$96.6 million in 2021, and 356 home mortgage loans totaling \$78.1 million in 2022. The results for all

three years are presented under the Assessment Area Concentration analysis. Examiners analyzed the home mortgage loans located within the assessment areas to evaluate the Geographic Distribution and Borrower Profile criteria. The review did not reveal any differences among the three years analyzed that would affect the overall conclusions. Therefore, examiners only presented the home mortgage analysis for 2022 since it is the most recent year in which aggregate data (the primary standard for comparison) is available. Nonetheless, examiners discussed any noteworthy variances between years in the corresponding narrative.

For the Lending Test, examiners reviewed all of the above noted loans for the Assessment Area Concentration analysis. For the Geographic Distribution analysis, examiners reviewed all loans inside of the assessment areas for all three loan categories. For the Borrower Profile analysis, examiners reviewed all home mortgage loans and random samples of small business and small farm loans inside of the assessment areas. These samples consisted of 81 small business loans totaling \$16.6 million, and 55 small farm loans totaling \$5.6 million.

For the Geographic Distribution and the Borrower Profile analyses, examiners used prescribed comparative data as the standard for comparison for determining performance. The 2022 D&B data provided a standard of comparison for the bank's small business and small farm lending performance. The 2022 HMDA aggregate data and 2020 U.S. Census data provided a standard of comparison for the bank's home mortgage lending performance. Although both the number and dollar volume of loans were analyzed, examiners emphasized performance by number of loans, because it is a better indicator of the number of businesses, farms, and individuals served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation up to the date of the current evaluation.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

The Bennington State Bank's satisfactory rating under the Lending Test is driven by its overall reasonable performance in all evaluated criteria.

#### **Loan-to-Deposit Ratio**

The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment areas' credit needs. The bank's performance was evaluated based on the average net loan-to-deposit ratios since the previous evaluation (12 quarters). The bank's average net loan-to-deposit ratio of 77.2 percent compares reasonably to similarly situated banks. Examiners selected the similarly situated banks based on their asset size, geographic location, and product mix. See the following table for details.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2023 (\$000s)	Average Net Loan-to-Deposit Ratio (%)
<b>The Bennington State Bank, Salina, Kansas</b>	<b>987,146</b>	<b>77.2</b>
Bank of the Flint Hills, Wamego, Kansas	437,280	87.4
Legacy Bank, Colwich, Kansas	655,092	74.2
First Bank Kansas, Salina, Kansas	548,128	54.0
<i>Source: Reports of Condition and Income 9/30/2020 – 6/30/2023</i>		

### **Assessment Area Concentration**

The bank made a majority of its small business, home mortgage, and small farm loans within the assessment areas, as illustrated in the following table.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	263	67.3	128	32.7	391	38,727	57.4	28,796	42.6	67,524
2021	288	69.6	126	30.4	414	64,822	67.1	31,814	32.9	96,636
2022	251	70.5	105	29.5	356	52,749	67.6	25,329	32.4	78,078
<b>Subtotal</b>	<b>802</b>	<b>69.1</b>	<b>359</b>	<b>30.9</b>	<b>1,161</b>	<b>156,298</b>	<b>64.5</b>	<b>85,939</b>	<b>35.5</b>	<b>242,238</b>
Small Business	174	80.2	43	19.8	217	36,974	78.1	10,343	21.9	47,317
Small Farm	218	79.9	55	20.1	273	20,883	77.6	6,036	22.4	26,919
<i>Source: Bank Data; Due to rounding, totals may not equal 100.0%</i>										

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. This overall conclusion is based on the performance in the Salina and Wichita Assessment Areas. The Wamego Assessment Area does not contain any low- or moderate-income census tracts; therefore, geographic distribution was not evaluated. Examiners focused on the bank’s record of lending in low- and moderate-income census tracts. A complete discussion of the bank’s performance in each assessment area can be found in the corresponding sections of this evaluation.

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels. Performance in all three assessment areas is consistent with this conclusion. For small business and small farm loans, examiners focused on the bank’s lending to businesses and farms with gross annual revenues of \$1 million or less. For home mortgage loans, examiners focused on the bank’s lending to low- and moderate-income individuals. A complete discussion of the bank’s performance in each assessment area can be found in the corresponding sections of this evaluation.

**Response to Complaints**

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

**COMMUNITY DEVELOPMENT TEST**

The Bennington State Bank demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities in the assessment areas. Because the bank was responsive to the community development needs of its assessment areas, community development activities benefitting the broader statewide or regional areas received consideration.

As part of determining performance, examiners compared the bank’s performance to four other similarly situated banks in Kansas. The Bennington State Bank’s community development activities are adequately responsive to the needs of the assessment areas.

**Community Development Loans**

The Bennington State Bank originated or renewed 941 community development loans totaling \$84.1 million during the evaluation period. Of the 941 qualified community development loans, 694 were PPP loans totaling \$21.3 million.

As of June 30, 2023, the community development lending by dollar volume represents 8.5 percent of total assets, and 12.7 percent of net loans. This level of lending exceeds the bank’s performance at the prior evaluation when community development loans were 5.7 percent of total assets, and 9.0 percent of net loans. The Bennington State Bank’s level of community development loans to net loans lags similarly situated banks with ratios ranging from 15.1 to 20.0 percent. By comparison, The Bennington State Bank’s level of community development loans to total assets is within the range of similarly situated banks with ratios ranging from 8.1 to 13.3 percent. The following tables show the breakdown of community development loans by assessment area, qualifying category, and year.

<b>Community Development Lending by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Salina	7	4,103	0	0	666	28,354	54	28,054	727	60,511
Wamego	0	0	0	0	59	4,831	0	0	59	4,831
Wichita	0	0	0	0	1	59	7	7,462	8	7,521
Broader Statewide/Regional Activities	0	0	0	0	145	8,337	2	2,880	147	11,217
<b>Total</b>	<b>7</b>	<b>4,103</b>	<b>0</b>	<b>0</b>	<b>871</b>	<b>41,581</b>	<b>63</b>	<b>38,396</b>	<b>941</b>	<b>84,080</b>

*Source: Bank Data*

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (Partial)	0	0	0	0	7	3,528	13	10,776	20	14,304
2021	7	4,103	0	0	844	33,803	10	10,316	861	48,222
2022	0	0	0	0	11	878	24	11,284	35	12,162
YTD 2023	0	0	0	0	9	3,372	16	6,020	25	9,392
<b>Total</b>	<b>7</b>	<b>4,103</b>	<b>0</b>	<b>0</b>	<b>871</b>	<b>41,581</b>	<b>63</b>	<b>38,396</b>	<b>941</b>	<b>84,080</b>
<i>Source: Bank Data</i>										

### **Qualified Investments**

The Bennington State Bank had \$3.6 million in qualified investment activity for the evaluation period. As of June 30, 2023, the bank's total dollar volume of qualified investments equates to 0.4 percent of total assets, and 1.5 percent of total securities. This level of activity is less than the performance at the prior evaluation when the total dollar volume of qualified investments was 0.8 percent of total assets, and 3.5 percent of total securities. The bank's level of qualified investments is at the lower end of the range among similarly situated banks with qualified investments ranging from 0.4 to 1.2 percent of total assets, and 1.0 to 11.6 percent of total securities. The following tables detail the bank's qualified investments by assessment area, qualifying category, and year.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Salina	0	0	35	101	7	72	14	2,658	56	2,831
Wamego	0	0	0	0	0	0	0	0	0	0
Wichita	0	0	1	1	0	0	2	783	3	784
<b>Total</b>	<b>0</b>	<b>0</b>	<b>36</b>	<b>102</b>	<b>7</b>	<b>72</b>	<b>16</b>	<b>3,441</b>	<b>59</b>	<b>3,615</b>
<i>Source: Bank Data</i>										

Qualified Investments by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	2	803	2	803
2020 (Partial)	0	0	0	0	0	0	1	370	1	370
2021	0	0	0	0	0	0	7	1,110	7	1,110
2022	0	0	0	0	0	0	1	55	1	55
YTD 2023	0	0	0	0	0	0	1	1,000	1	1,000
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>12</b>	<b>3,338</b>	<b>12</b>	<b>3,338</b>
Qualified Grants & Donations	0	0	36	102	7	72	4	103	47	277
<b>Total</b>	<b>0</b>	<b>0</b>	<b>36</b>	<b>102</b>	<b>7</b>	<b>72</b>	<b>16</b>	<b>3,441</b>	<b>59</b>	<b>3,615</b>

Source: Bank Data

### **Community Development Services**

The Bennington State Bank had 48 qualifying community development services for this evaluation period. This level of services is more than the performance at the prior evaluation when the bank performed 21 community development services. This level of community development services is within the range of similarly situated banks, which ranged from 39 to 59 services. The following tables illustrate the bank's community development services by assessment area, qualifying category, and year.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Salina	17	30	0	1	48
Wamego	0	0	0	0	0
Wichita	0	0	0	0	0
<b>Total</b>	<b>17</b>	<b>30</b>	<b>0</b>	<b>1</b>	<b>48</b>

Source: Bank Data

Community Development Services by Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020 (Partial)	0	0	0	0	0
2021	0	5	0	1	6
2022	17	19	0	0	36
YTD 2023	0	6	0	0	6
<b>Total</b>	<b>17</b>	<b>30</b>	<b>0</b>	<b>1</b>	<b>48</b>

Source: Bank Data

One of the more notable community development services is that The Bennington State Bank is active in helping low- or moderate-income individuals and families obtain grants through a first-time homebuyer program with Federal Home Loan Bank. The bank's efforts through this program have resulted in more than 80 such grants to qualifying borrowers during the evaluation period. This is particularly noteworthy since it demonstrates the bank's efforts to increase the availability of financial services to low- or moderate-income individuals and families who otherwise may not have had access to such funding.

The bank also offers basic low-cost checking and savings accounts, which helps increase access to financial services for low- or moderate-income individuals. In addition, the bank has a branch location in a moderate-income census tract in Salina, Kansas.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

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

### **SALINA ASSESSMENT AREA – Full-Scope Review**

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SALINA ASSESSMENT AREA**

The Salina Assessment Area consists of Dickinson, Lincoln, Mitchell, Osborne, Ottawa, Russell, and Saline counties. The bank added Dickinson County to its Salina Assessment Area after the opening of the branch in Abilene in 2021. The assessment area is located in the nonmetropolitan area of Kansas, and consists largely of rural countryside and farmland. The largest town in the assessment area is Salina (population 46,889 according to 2020 U.S. Census data), where 2 of the bank's 9 offices are located. The following shows demographic and economic information from the 2020 U.S. Census and 2022 D&B data for this assessment area.

#### **Economic and Demographic Data**

The assessment area consists of 27 census tracts, which includes 5 moderate-income, 17 middle-income, and 5 upper-income tracts. 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 #
Geographies (Census Tracts)	27	0.0	18.5	63.0	18.5
Population by Geography	97,366	0.0	15.7	63.6	20.7
Housing Units by Geography	47,570	0.0	16.4	65.3	18.3
Owner-Occupied Units by Geography	28,753	0.0	9.9	66.8	23.3
Occupied Rental Units by Geography	12,454	0.0	30.7	58.3	11.0
Vacant Units by Geography	6,363	0.0	18.2	72.2	9.6
Businesses by Geography	7,827	0.0	20.4	62.1	17.5
Farms by Geography	934	0.0	4.8	76.4	18.7
Family Distribution by Income Level	25,191	16.9	17.4	23.6	42.1
Household Distribution by Income Level	41,207	21.8	17.9	19.2	41.0
Median Family Income Nonmetropolitan Kansas	\$65,467	Median Housing Value			\$121,360
Families Below Poverty Level	7.1%	Median Gross Rent			\$724
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>					

The Federal Financial Institutions Examination Council (FFIEC) updates median family income figures annually. The median family income figures for the Salina Assessment Area were used to analyze home mortgage lending for the Borrower Profile performance, and determine certain qualifying community development activities for this assessment area. These figures along with the corresponding low-, moderate-, middle, and upper-income thresholds are presented in the following table.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2020 (\$64,200)	<\$32,100	\$32,100 to <\$51,360	\$51,360 to <\$77,040	≥\$77,040
2021 (\$64,800)	<\$32,400	\$32,400 to <\$51,840	\$51,840 to <\$77,760	≥\$77,760
2022 (\$73,400)	<\$36,700	\$36,700 to <\$58,720	\$58,720 to <\$88,080	≥\$88,080
<i>Source: FFIEC</i>				

The 2022 D&B data indicates the primary industries in the assessment area include the service industries, which comprise 33.0 percent of all area businesses (non-farm and farm), followed by non-classifiable establishments at 13.7 percent, and retail trade at 12.0 percent. This data also indicates that a notable number of area businesses are relatively small, with 89.2 percent having 9 or fewer employees, and 85.2 percent operating from a single location.

### **Competition**

The competition for financial services in the assessment area is notable. According to June 30, 2022 FDIC Deposit Market Share data, there are 26 institutions operating 63 offices in the assessment area. The Bennington State Bank ranked first holding 18.9 percent of the deposit market share. Additionally, the 2022 HMDA aggregate data shows significant competition, with

144 lenders originating 1,342 home mortgage loans. The Bennington State Bank ranked first with 11.9 percent of the lending market share.

**Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business, small farm, and home mortgage loans represent the primary credit needs in this assessment area. Opportunities exist for originating such loans, as indicated by aggregate data, along with area demographics on the number of small businesses, and the number of housing units in the assessment area. Community development needs include affordable housing, community services, economic development, and revitalization/stabilization, as evidenced by the number of small businesses, and the number of low- and moderate-income families.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SALINA ASSESSMENT AREA**

**LENDING TEST**

The Bennington State Bank demonstrates reasonable performance under the Lending Test in the Salina Assessment Area. This is supported by the bank’s reasonable performance under the Geographic Distribution and Borrower Profile criteria.

**Geographic Distribution**

The Bennington State Bank’s geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Examiners focused on the bank’s performance in the moderate-income census tracts as the assessment area does not include any low-income census tracts. The bank’s reasonable small business, home mortgage, and small farm lending performance supports this conclusion.

***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank’s level of lending in the moderate-income census tracts is comparable to demographic data.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	20.4	30	21.4	9,560	33.9
Middle	62.1	76	54.3	11,841	41.9
Upper	17.5	34	24.3	6,826	24.2
<b>Totals</b>	<b>100.0</b>	<b>140</b>	<b>100.0</b>	<b>28,227</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank’s level of lending in the moderate-income census tracts is comparable to both demographic and aggregate data.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	9.9	15.1	22	13.8	10,408	36.2
Middle	66.8	64.2	93	58.1	11,464	39.9
Upper	23.3	20.6	45	28.1	6,874	23.9
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>28,746</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census, Bank Data, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

### ***Small Farm Loans***

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank’s level of lending in the moderate-income census tracts lags comparable demographic data. However, this performance is reasonable considering there is limited opportunity to lend in the area (only 45 farms), and the majority of the moderate-income census tracts are located within the Salina city limits.

<b>Geographic Distribution of Small Farm Loans</b>					
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	4.8	0	0.0	0	0.0
Middle	76.4	142	65.7	13,028	62.8
Upper	18.7	74	34.3	7,715	37.2
<b>Totals</b>	<b>100.0</b>	<b>216</b>	<b>100.0</b>	<b>20,743</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among businesses and farms of different sizes and individuals of different income levels. The bank’s reasonable small business, home mortgage, and small farm lending performance supports this conclusion.

### ***Small Business Loans***

The Bennington State Bank’s record of extending small business loans to businesses of different sizes is reasonable. As shown in the following table, the bank’s level of lending to businesses with revenues of \$1 million or less is proportionate to demographic data in this revenue category.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	78.2	32	68.1	4,184	53.2
>\$1,000,000	5.4	15	31.9	3,685	46.8
Revenue Not Available	16.4	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>47</b>	<b>100.0</b>	<b>7,869</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data, Bank Data</i>					
<i>Due to rounding, totals may not equal 100.0%</i>					

### **Home Mortgage Loans**

The Bennington State Bank's record of extending home mortgage loans to borrowers of different income levels is reasonable. As shown in the following table, the bank's level of lending to both low- and moderate-income borrowers is comparable to aggregate and demographic data.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	16.9	9.1	20	12.5	1,139	4.0
Moderate	17.4	21.0	24	15.0	1,819	6.3
Middle	23.6	19.6	28	17.5	2,167	7.5
Upper	42.1	28.8	66	41.3	12,815	44.6
Not Available	0.0	21.5	22	13.8	10,806	37.6
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>160</b>	<b>100.0</b>	<b>28,746</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census, Bank Data, 2022 HMDA Aggregate Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						

### **Small Farm Loans**

The distribution of loans to farms of different sizes is reasonable. As shown in the following table, the bank's level of lending to farms with revenues of \$1 million or less is proportionate to demographic data in this revenue category.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	98.2	52	94.5	4,712	84.6
>\$1,000,000	1.1	3	5.5	858	15.4
Revenue Not Available	0.7	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>5,570</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data, Bank Data</i>					
<i>Due to rounding, totals may not equal 100.0%</i>					

## **COMMUNITY DEVELOPMENT TEST**

The Bennington State Bank's community development performance demonstrates adequate responsiveness to community development needs in the Salina Assessment Area.

### **Community Development Loans**

The bank originated 727 community development loans totaling \$60.5 million in this assessment area. Of the 727 loans, 653 were PPP loans totaling \$20.8 million. The following are notable examples of community development loans.

- The bank originated a \$4.3 million loan that helped with the stabilization of a moderate-income census tract by providing financing for the expansion of a business located in that tract.
- The bank originated a loan totaling approximately \$2.0 million to help retain affordable housing in a moderate-income census tract.

### **Qualified Investments**

The bank made 46 qualified investments totaling \$2.7 million in the Salina Assessment Area. The following are notable examples of community development investments.

- The bank purchased a \$750,000 share of a bond in which the proceeds are helping to improve a designated district located in a moderate-income census tract.
- The bank purchased a \$390,000 share of a bond in which the proceeds are designated to various infrastructure improvements throughout moderate-income census tracts in the area.

### **Community Development Services**

The bank provided 48 community development services within the Salina Assessment Area. These services primarily consisted of bank employees providing financial expertise to borrowers applying to the Kansas Housing Assistance Fund offered by the Kansas Housing Resources Corporation. This fund assists homeowners in Kansas who are struggling to make mortgage, utility, and tax payments.

## **WAMEGO ASSESSMENT AREA – Limited-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WAMEGO ASSESSMENT AREA**

The Wamego Assessment Area consists of Pottawatomie County, which is one of the three counties located in the Manhattan, Kansas Metropolitan Statistical Area (MSA). The largest city in this assessment area is Wamego (population 4,860 according to 2020 U.S. Census data), where the bank's branch is located. The following shows demographic and economic information from the 2020 U.S. Census data and 2022 D&B data for this assessment area.

## **Economic and Demographic Data**

This assessment area includes five census tracts, of which three are middle-income census tracts, and two are upper-income census tracts. The following table illustrates select demographic characteristics of the Wamego Assessment Area.

<b>Demographic Information of the Assessment Area</b>					
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>
Geographies (Census Tracts)	5	0.0	0.0	60.0	40.0
Population by Geography	25,348	0.0	0.0	44.9	55.1
Housing Units by Geography	9,824	0.0	0.0	46.6	53.4
Owner-Occupied Units by Geography	6,789	0.0	0.0	47.1	52.9
Occupied Rental Units by Geography	2,094	0.0	0.0	44.7	55.3
Vacant Units by Geography	941	0.0	0.0	46.7	53.3
Businesses by Geography	2,102	0.0	0.0	38.4	61.6
Farms by Geography	208	0.0	0.0	73.6	26.4
Family Distribution by Income Level	6,421	13.8	14.2	22.6	49.3
Household Distribution by Income Level	8,883	17.0	12.5	16.2	54.3
Median Family Income MSA - Manhattan, Kansas MSA		\$70,357	Median Housing Value		\$180,274
Families Below Poverty Level		7.1%	Median Gross Rent		\$954
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data</i>					
<i>Due to rounding, totals may not equal 100.0%</i>					
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>					

The annually updated FFIEC median family income figures for the Manhattan, Kansas MSA were used to analyze home mortgage lending for the Borrower Profile performance, and determine certain qualifying community development activities for this assessment area. These figures along with corresponding low-, moderate-, middle, and upper-income thresholds are presented in the following table.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2020 (\$68,000)	<\$34,000	\$34,000 to <\$54,400	\$54,400 to <\$81,600	≥\$81,600
2021 (\$69,500)	<\$34,750	\$34,750 to <\$55,600	\$55,600 to <\$83,400	≥\$83,400
2022 (\$80,000)	<\$40,000	\$40,000 to <\$64,000	\$64,000 to <\$96,000	≥\$96,000
<i>Source: FFIEC</i>				

The 2022 D&B data indicates the primary industries in the assessment area include the service industries, which comprise 33.5 percent of all area businesses, followed by non-classifiable establishments at 13.1 percent, and retail trade at 12.2 percent. This data also indicates that a notable number of area businesses are relatively small, with 89.4 percent having 9 or fewer employees, and 86.8 percent operating from a single location.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WAMEGO ASSESSMENT AREA

### LENDING TEST

The lending performance in the Wamego Assessment Area is consistent with the institution's lending performance overall. Examiners drew conclusions regarding the bank's lending performance from reviewing facts and data, including performance figures, aggregate lending data comparisons, and demographic information. Below are the Borrower Profile criterion tables by loan type. There are no Geographic Distribution tables because the Wamego Assessment Area does not contain any low- or moderate-income census tracts.

#### *Small Business Loans*

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	80.9	12	70.6	932	64.5
>\$1,000,000	6.0	5	29.4	512	35.5
Revenue Not Available	13.1	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>1,444</b>	<b>100.0</b>
<small>Source: 2022 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</small>					

#### *Home Mortgage Loans*

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	13.8	4.9	0	0.0	0	0.0
Moderate	14.2	14.6	1	7.7	101	4.0
Middle	22.6	22.3	5	38.5	574	22.6
Upper	49.3	40.7	7	53.8	1,859	73.4
Not Available	0.0	17.4	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>2,534</b>	<b>100.0</b>
<small>Source: 2020 U.S. Census, Bank Data, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</small>						

### COMMUNITY DEVELOPMENT TEST

The community development performance in the Wamego Assessment Area is consistent with the institution's community development performance overall. Examiners considered the institution's capacity, as well as the need and availability of community development opportunities. The bank meet these needs through community development lending.

The bank originated 59 community development loans totaling \$4.8 million in this assessment area. Of the 59 loans, 41 were PPP loans totaling \$482,000. All of the community development loans benefiting this area promoted economic development. The Bennington State Bank did not purchase any qualified investments, make any donations, or perform any community development services that benefited the Wamego Assessment Area during the evaluation period.

## WICHITA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WICHITA ASSESSMENT AREA

The Wichita Assessment Area includes all of Sedgwick County, which is one of the four counties currently in the Wichita, Kansas MSA. The largest city in this assessment area is Wichita (population 395,699 according to 2020 U.S. Census data), where the bank’s sole branch office is located. The following shows demographic and economic information from the 2020 U.S. Census data and 2022 D&B data for this assessment area.

#### **Economic and Demographic Data**

The assessment area consists of 135 census tracts, which includes 8 low-income tracts, 42 moderate-income tracts, 49 middle-income tracts, 34 upper-income tracts, and 2 tracts with no income designation. The following table illustrates select demographic characteristics of the Wichita Assessment Area.

<b>Demographic Information of the Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	135	5.9	31.1	36.3	25.2	1.5
Population by Geography	523,824	3.8	27.7	36.2	31.6	0.7
Housing Units by Geography	220,638	4.7	30.9	36.0	27.3	1.1
Owner-Occupied Units by Geography	124,213	2.1	21.6	40.2	36.0	0.2
Occupied Rental Units by Geography	75,107	7.5	42.4	31.9	15.9	2.3
Vacant Units by Geography	21,318	10.0	44.4	26.0	17.1	2.4
Businesses by Geography	36,719	2.6	22.6	32.7	39.0	3.1
Farms by Geography	1,174	0.9	15.8	35.4	46.6	1.2
Family Distribution by Income Level	126,223	20.3	18.6	21.0	40.1	0.0
Household Distribution by Income Level	199,320	23.6	17.6	17.7	41.1	0.0
Median Family Income MSA - Wichita, Kansas MSA		\$74,120	Median Housing Value			\$142,797
Families Below Poverty Level		9.2%	Median Gross Rent			\$838
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data            Due to rounding, totals may not equal 100.0%            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The annually updated FFIEC median family income figures for the Wichita, Kansas MSA were used to analyze home mortgage lending for the Borrower Profile performance, and determine certain qualifying community development activities for this assessment area. These figures along with corresponding low-, moderate-, middle- and upper-income thresholds are presented in the following table.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2020 (\$71,800)	<\$35,900	\$35,900 to <\$57,440	\$57,440 to <\$86,160	≥\$86,160
2021 (\$73,200)	<\$36,600	\$36,600 to <\$58,560	\$58,560 to <\$87,840	≥\$87,840
2022 (\$85,700)	<\$42,850	\$42,850 to <\$68,560	\$68,560 to <\$102,840	≥\$102,840
<i>Source: FFIEC</i>				

The 2022 D&B data indicates the primary industries in the assessment area include service industries, which comprise 38.3 percent of all area businesses, followed by non-classifiable establishments at 16.5 percent, and retail trade at 12.4 percent. This data also indicates that a notable number of area businesses are relatively small, with 88.9 percent having 9 or fewer employees, and 88.1 percent operating from a single location.

### **Competition**

The competition for financial services in the assessment area is strong. According to June 30, 2022 FDIC Deposit Market Share data, there are 37 banks operating 157 offices in Sedgwick County. The Bennington State Bank ranked 35<sup>th</sup>, holding 0.1 percent of the deposit market share. Additionally, the 2022 HMDA aggregate data shows significant competition with 356 lenders originating 15,596 home mortgage loans. The Bennington State Bank ranked 53<sup>rd</sup> with 0.5 percent of the lending market share.

### **Community Contact**

Examiners may contact community members or other third parties in the assessment area to help gain insight into the area’s economy, demographic trends, and business environment. This information not only helps in identifying credit and community development needs and opportunities, but also assists in determining whether local financial institutions are responsive to those needs.

Examiners referenced a recent interview conducted with an individual knowledgeable of the area’s economic conditions and development efforts. The contact indicated that the primary challenges to the area are inflation and labor issues, with many businesses having difficulty getting and retaining quality employees. The contact indicated that competition for banking services in the area is strong, and was not aware of any additional credit-related projects or financing programs that banks should offer. The contact mentioned the primary need is education, specifically education on how to launch a business, how to successfully expand a business, and how to effectively sustain operations. The contact indicated that area financial institutions are actively involved in serving the needs of the area, and was not aware of any unmet credit or community development needs.

**Credit and Community Development Needs and Opportunities**

Considering demographic and economic data and information provided by the community contact, examiners determined that small business and home mortgage loans represent the primary credit needs in this assessment area. Opportunities exist for originating such loans, as indicated by aggregate data, along with area demographics on the number of small businesses and housing units in the assessment area. Community development needs include affordable housing, community services, economic development, and revitalization/stabilization, as evidenced by the number of small businesses, and low- and moderate-income families and census tracts in this assessment area.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WICHITA ASSESSMENT AREA**

**LENDING TEST**

The Bennington State Bank demonstrates reasonable performance under the Lending Test in the Wichita Assessment Area, which is supported by the bank’s Geographic Distribution and Borrower Profile performances.

**Geographic Distribution**

Overall, The Bennington State Bank’s geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Although the home mortgage lending performance was excellent, the bank’s reasonable small business lending performance is the driver for this conclusion.

***Small Business Loans***

The geographic distribution of small business lending reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank’s lending performance in the low-income census tracts lags demographic data; however, the bank’s performance in the moderate-income census tracts is comparable to demographic data. Additionally, the assessment area is new since the prior evaluation as the bank opened the branch in this area just under two years ago. Considering this information, the bank’s performance is reasonable.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	2.6	0	0.0	0	0.0
Moderate	22.6	3	17.6	2,024	27.7
Middle	32.7	5	29.4	1,272	17.4
Upper	39.0	9	52.9	4,007	54.9
Not Available	3.1	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>7,303</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

### ***Home Mortgage Loans***

The geographic distribution of home mortgage lending reflects excellent dispersion throughout the assessment area. As shown in the following table, the bank’s lending performance in the low- and moderate-income census tracts exceeds both demographic and aggregate data.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	2.1	1.5	3	3.8	93	0.4
Moderate	21.6	20.9	35	44.9	12,723	59.3
Middle	40.2	39.3	25	32.1	4,348	20.3
Upper	36.0	38.1	15	19.2	4,305	20.1
Not Available	0.2	0.2	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>21,469</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census, Bank Data, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration in the Wichita Assessment Area. This conclusion is supported by the bank’s reasonable small business and home mortgage lending performance.

### ***Small Business Loans***

The distribution of loans to businesses of different sizes is reasonable. As shown in the following table, the bank’s level of lending to businesses with revenues of \$1 million or less is comparable to demographic data in this revenue category.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	83.4	15	88.2	6,973	95.5
>\$1,000,000	5.6	2	11.8	330	4.5
Revenue Not Available	11.1	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>7,303</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

### ***Home Mortgage Loans***

The bank’s record of extending home mortgage loans to borrowers of different income levels is reasonable. As shown in the following table, the bank’s lending performance to low- and moderate-income borrowers notably lags aggregate data; however, there is a significant amount of non-owner occupied loans that do not have reported income. When the non-owner occupied loans are removed from the analysis, the bank’s performance in the low- and moderate-income census tracts is comparable to aggregate data. Considering this factor, the bank’s performance is reasonable. The

bank’s performance in 2020 and 2021 lags the performance in 2022, but it is still considered reasonable overall.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	20.3	9.7	1	1.3	379	1.8
Moderate	18.6	21.0	5	6.4	380	1.8
Middle	21.0	19.4	4	5.1	428	2.0
Upper	40.1	26.6	6	7.7	1,787	8.3
Not Available	0.0	23.2	62	79.5	18,495	86.1
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>21,469</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census, Bank Data, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

**COMMUNITY DEVELOPMENT TEST**

The community development performance demonstrates adequate responsiveness to community development needs in the Wichita Assessment Area, considering the institution’s capacity, as well as the need and availability of such community development opportunities.

**Community Development Loans**

The bank originated 8 community development loans totaling \$7.5 million in this assessment area. The majority of the lending helped to stabilize low- and moderate-income census tracts by providing necessary financing to businesses operating and providing employment opportunities in such tracts.

**Qualified Investments**

The Bennington State Bank made 3 qualified investments totaling \$783,701 in the Wichita Assessment Area. For 1 such investment, the bank participated in a bond in which the proceeds supported various infrastructure improvement projects in moderate-income census tracts throughout the area.

**Community Development Services**

The Bennington State Bank did not perform any community development services that benefited the Wichita Assessment Area during the evaluation period.

## 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.