



Community Reinvestment Act

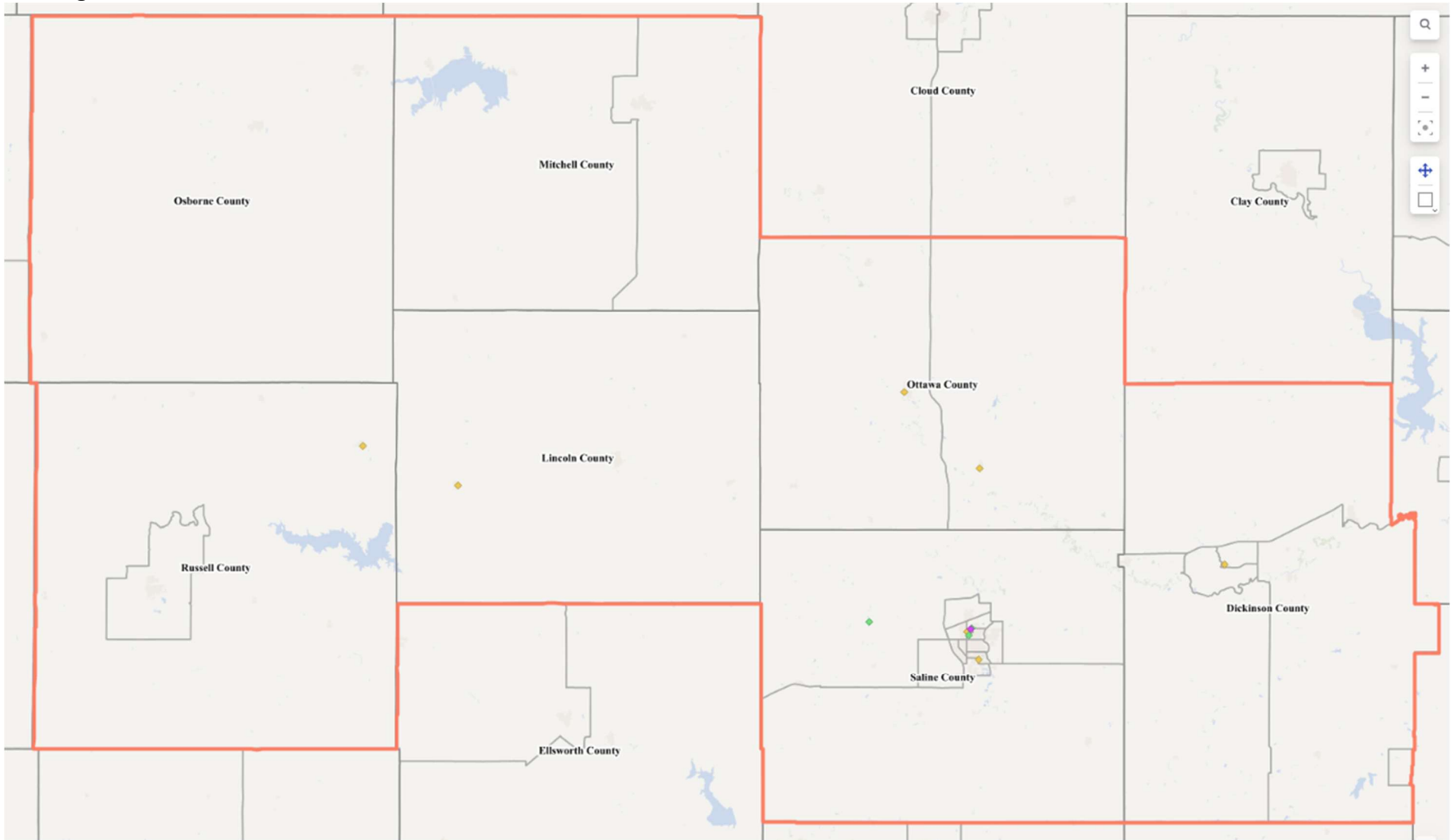
CRA PUBLIC FILE

**BENNINGTON
STATE  BANK**

Member
FDIC

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

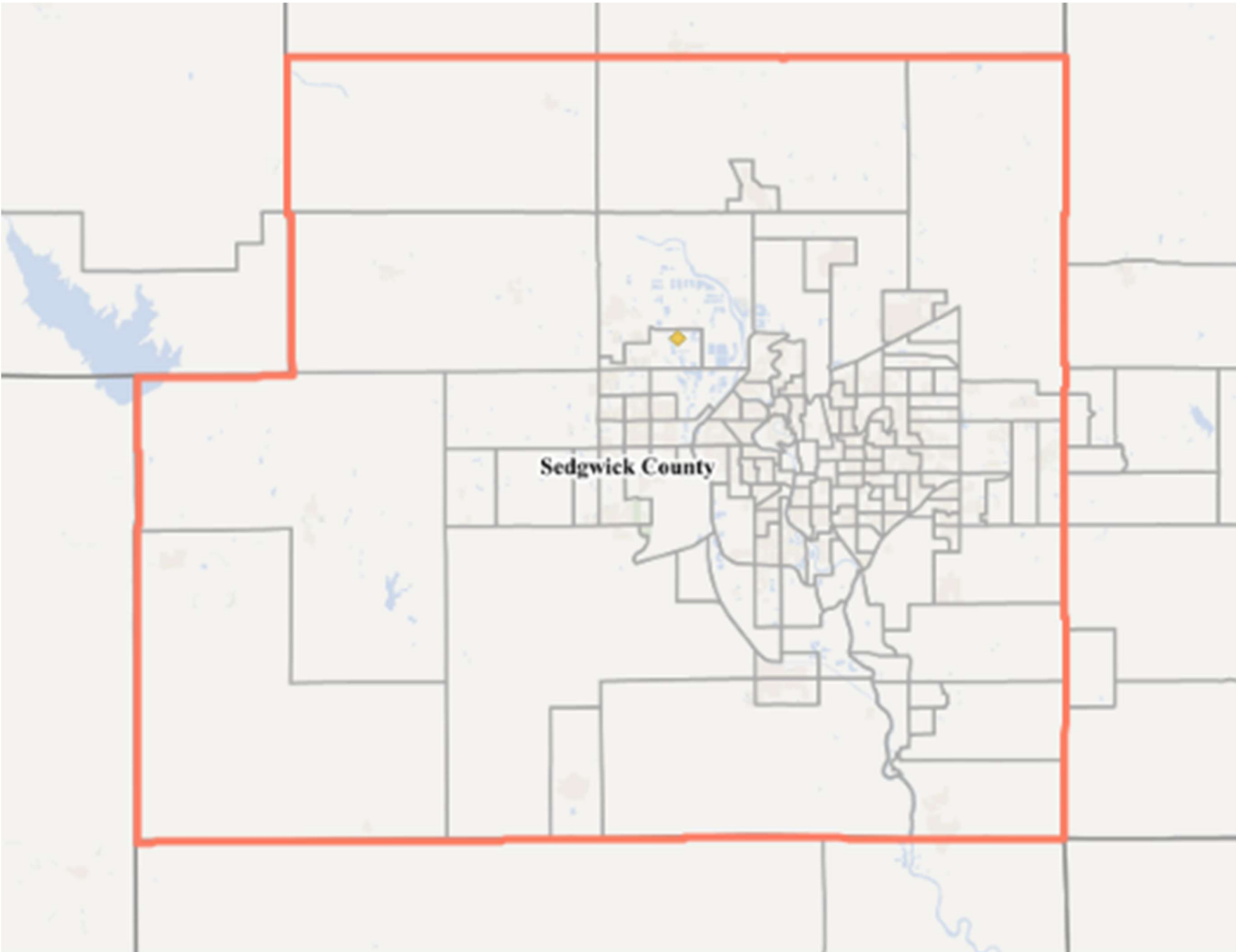
Bennington State Bank – Wamego/Topeka Assessment Area – Pottawatomie Co., Shawnee Co., Wabaunsee Co., Osage Co., Lyon Co., Coffey Co.



County	Census Tract	Tract Income
Coffey KS	9661.00	Middle
Coffey KS	9662.00	Upper
Coffey KS	9663.00	Middle
Lyon KS	0001.01	Mod
Lyon KS	0001.02	N/A
Lyon KS	0001.03	Upper
Lyon KS	0002.01	Middle
Lyon KS	0002.02	Upper
Lyon KS	0002.03	Middle
Lyon KS	0003.00	Middle
Lyon KS	0004.00	Middle
Lyon KS	0005.00	Middle
Lyon KS	0006.00	Upper
Lyon KS	0007.00	Upper
Lyon KS	0008.00	Upper
Osage KS	0101.00	Middle
Osage KS	0102.00	Middle
Osage KS	0103.00	Middle
Osage KS	0104.00	Mod
Osage KS	0105.00	Middle
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

County	Census Tract	Tract Income
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
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
Wabaunsee KS	4831.00	Middle
Wabaunsee KS	4832.00	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

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

Public Comments



No public comments have been made during the current period.

Loan to Deposit Ratios



2025

March 31 st	79.74%
June 30 th	82.53%
September 30 th	80.34%
December 31 st	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 6th 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

April 2026

Eskridge, Kansas

103 ½ North Main
Eskridge, KS 66423
Census Tract: 4832.00
Lobby Hours:
M-Th 8:30-4:00
F 8:30-5:00
Drive-Up Hours:
M-F 8:00-5:00
Sat 9:00-12:00
Phone No. 785-449-2266
Fax No. 785-449-2371

Eskridge, Kansas

Flint Hills Insurance Agency
103 ½ North Main
Eskridge, KS 66423
Census Tract: 4832.00
Phone No. 785-449-2430
Fax No. 785-449-2371

Osage City, Kansas

913 Market Street
Osage City, KS 66523
Census Tract: 0104.00
Lobby Hours:
M-F 8:30-4:00
Drive-Up Hours:
M-F 7:30-6:00
Sat 7:30-12:00
Phone No. 785-528-5040
Fax No. 785-528-3125

Hartford, Kansas

208 Commercial
Hartford, KS 66854
Census Tract: 0008.00
Lobby Hours:
M-Th 8:00-4:00
F 8:00-5:00
Sat 8:00-11:00
Drive-Up Hours:
M-Th 8:00-4:00
F 8:00-5:00
Sat 8:00-11:00
Phone No. 620-392-5541
Fax No. 620-392-5801

Burlingame, Kansas

115 South Topeka Ave
Burlingame, KS 66413
Census Tract: 0102.00
Lobby Hours:
M-F 8:30-4:00
Drive-Up Hours:
M-F 8:00-5:00
Sat 8:30-11:30
Phone No. 785-654-2421
Fax No. 785-654-3567

Branches Closed:

None

Products & Services Branch Listing



Bennington State Bank's products & services and branch listing are outlined following this page.

Personal Banking

Checking accounts

We offer three great checking accounts.

Start your journey  

	Do you maintain a minimum daily balance of \$500 in your account?	Do you have a cell phone or look for deals?	Do you want a basic account?
	Gold Checking	Silver Checking	Bronze Checking
 Online and Mobile Banking Online banking, mobile banking, bill pay, debit card and eStatement.	✓	✓	✓
 ID Theft Aid^{1,2} Includes payment card fraud resolution, \$2,500 in personal identity theft benefit and identity restoration.	✓	✓	
 Roadside Assistance Available 24/7 and free to use, up to \$80 in covered service charges.	✓	✓	
 Health Savings Card Save money on prescriptions, eye exams, frames, lenses and hearing services.	✓	✓	
 Cell Phone Protection^{1,2} Receive up to \$200 per claim (\$400 per year) if your cell phone is broken or stolen.	✓	✓	
 Shop Local, Save Local with BaZing Savings Local discounts and national retailer deals to save you money on shopping, dining, travel & more.	✓	✓	
 \$10,000 Travel Accidental Death Coverage² Peace of mind for the unexpected.	✓	✓	
 Receive Interest on Your Checking Balance Our best personal checking rate.	✓		
 powered by BaZing *Minimum Daily Balance is the lowest balance on any given day. Other fees and charges may apply. Please see a bank representative for a complete listing of all account terms and conditions. ¹ Subject to the terms and conditions detailed in the Guide to Benefits. ² Insurance products are: NOT A DEPOSIT. NOT FDIC-INSURED. NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY. NOT GUARANTEED BY THE BANK. Participating merchants on BaZing are not sponsors of the program, are subject to change without notice, may not be available in all regions and may choose to limit deals.	\$8 Monthly Fee if Minimum Daily Balance* Requirement Not Met	\$6 Monthly Fee	No Monthly Fee

WE ARE YOUR TRUSTED HOMETOWN BANK!

-  **Local Friendly Service**
-  **Community Focused**
-  **Knowledgeable Staff**
-  **Committed to You**



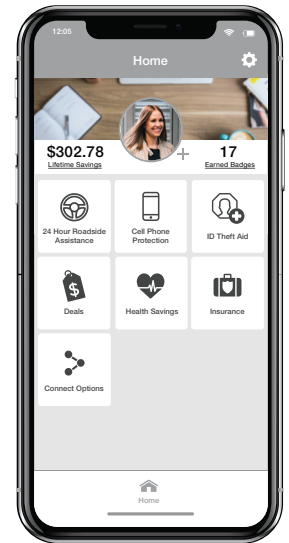
Save money on the things you're already paying for.

Benefits are right in the BaZing app, right where you are!

- ROADSIDE ASSISTANCE WHEN YOU NEED IT
- MORE THAN 400,000 RETAIL OFFERS ACROSS THE U.S.
- DEALS FROM NATIONAL RETAILERS & LOCAL BUSINESSES
- HEALTH SAVINGS CARD TO SAVE AT THE PHARMACY



Get started by downloading the BaZing app



VISA® Debit Card

Better Than Cash

Included with every transaction account

Our debit cards are easy and safe to use, giving you access to your funds without worrying about carrying cash. Convenient, safe and simple, pay with confidence using our chip enabled debit card.

Simple, Safe, and Convenient

- Transactions are deducted directly from your checking account
- Chip enabled and contactless for fast, secure transactions
- Most merchants do not require you to enter your PIN, simply select credit and sign
- Easily view transactions anytime with Online and Mobile Banking
- Works with digital wallets like Apple Pay and Google Pay
- Stay informed about transactions with eAlerts



Card Activation

To activate your Debit VISA, call this number from the phone your card is associated with:
1-800-717-4923

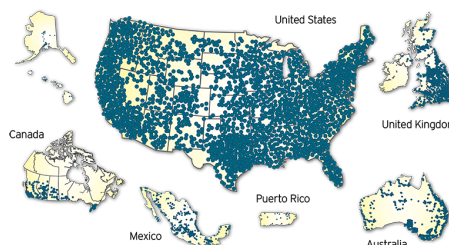


FREE ATM Network

Over 55,000 Free ATMS Worldwide!

- All BSB Customers have access to over 55,000 surcharge-free ATMs worldwide through Allpoint
- Allpoint ATM's are at many retailers such as Target, Walgreens, CVS, Kroger, Kwik Shop, and more
- Find an ATM location near you on our website

bsbks.com/atms



Online & Mobile Banking

Bank on your own time with Online & Mobile Banking!

Online & Mobile Banking Features



Monitor Transactions & Check Balances

Stay up to date and securely access your BSB accounts from anywhere you have internet access.



Mobile App

Take the features of online banking with you on your mobile device or tablet. Conveniently view your account and manage your money with our mobile app.



Transfer Funds

Transfer funds instantly between your Bennington State Bank accounts.



Bill Pay

Never miss a payment again with the ability to manage your bills digitally. Save time and money by setting up and scheduling your bills to be paid online.



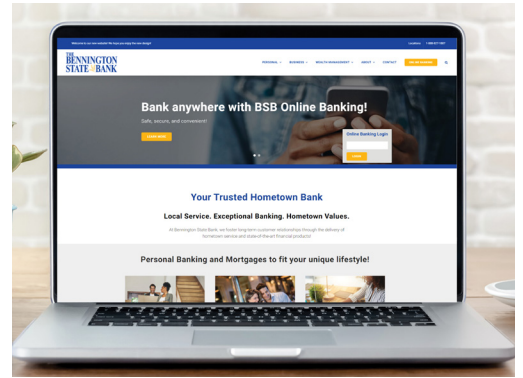
Mobile Deposit

Deposit checks anywhere from your smartphone. Simply open the BSB Mobile App and take a photo of the front and back of your check and submit.



Secure Login

Log in with fingerprint and Face ID for secure access.



Card Control

Easily and securely control your Bennington State Bank debit cards. Turn cards on or off, set transaction limits, and manage access.



Account Alerts

Set up custom alerts to help prevent fraud by being informed about your account activity.



Paperless Statements

Conveniently access paperless eStatements, notices, tax documents, and more.

How to Set Up Online Banking:

1. Visit our website, bsbks.com, using a web browser such as Google Chrome or Safari.
2. Click the yellow "LOGIN" button on the bsbks.com home page
3. Click "Online Enrollment"
4. Fill out the personal information required in the online banking form, bold items are required
5. Select which account you want to view on your online banking account, you can add multiple by clicking "Add Another Account"
6. Click "Save"
7. Check box to indicate you have read the Terms & Conditions
8. Choose your User ID

- *You will receive an email within one business day that includes a temporary password*
- Once you login to your online banking account, you will be asked to select these security features to verify your identity:
- Challenge questions (use the pull down to choose 3 different questions)
- Image that will be used to verify your identity and protect your account information (choose from several categories)
- Enter a new password of your own choosing



Debit Card Controls

Manage your card instantly to protect against fraud

Take charge of your debit card security and spending with Card Control in Online and Mobile Banking. Use Card Control for the following circumstances:

- You have misplaced your card
- You notice suspicious activity
- You want extra peace of mind

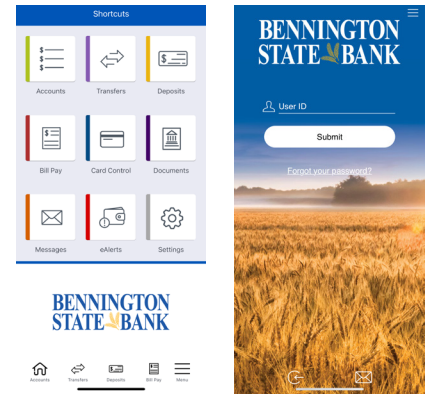
How to set Card Controls:

1. Login to Online Banking or Mobile App
2. In Online Banking, click "User Settings" and then "Card Control"
3. In the Mobile App, click on the menu button in the bottom right corner and select "Card Control"

How to Set Up Mobile Banking:

Download the BSB Mobile App on your iPhone or Android

1. Once Online enrollment is complete, use the same login information to log into the Mobile Banking App
2. Go to your settings to set up biometric or pin to login to the app faster
3. Go to the menu in the bottom right corner to:
 - Monitor Accounts
 - Transfer Funds
 - Deposit checks
 - Pay Bills
 - Control your Debit Card
 - Set up Account Alerts
 - View eStatements



Mobile Deposit Instructions*:

Skip the trip to the bank and deposit checks anytime with the BSB Mobile App

1. Login to the app
2. Click on the menu button in the bottom right corner
3. Select the "Deposits" Button
4. Enter check information
5. Endorse the back of your check and check the mobile deposit box if there is one.
6. Take a photo of the front and back of your check
7. Click "Submit" Button

* Limits apply



Bill Pay Instructions:

Save time and money by setting up and scheduling your bills to be paid online

To enroll in Bill Pay:

1. You must first be enrolled in Online Banking
2. Login to Online Banking on a personal computer
3. Click on "Transfers" then "Bill Pay"
4. Complete the required information and submit
5. You will receive an email from BSB to confirm enrollment
6. Once bill pay is set up in online banking, you are able to pay bills from your mobile banking app



How to pay bills using Bill Pay through Online Banking:

1. Login to Online Banking
2. Click on "Transfers" then "Bill Pay"
3. Fill in the information for the bill you want to pay and submit

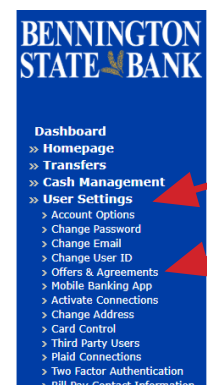
How to use Bill Pay on BSB Mobile App:

1. Login to BSB Mobile Banking App
2. Go to the menu in the bottom right corner
3. Click on "Bill Pay"
4. Fill in the information for the bill you want to pay and submit

How to Sign up for eStatements:

Reduce paper and keep your information more secure with eStatements

1. Login to your online banking account using a browser*
 2. You may get an "eStatements" prompt
 3. If not, you can click on "User Settings" and then "Offers & Agreements"
 4. Click View PDF and enter code
 5. Validate your email
 6. Choose the account(s) you want. If you click the top blue box, it will choose all accounts
 7. Click on "Accept the eStatements Terms & Conditions"
- Receiving your statements digitally is a faster and more secure option than receiving paper statements.
 - You will receive an e-alert when your eStatement is ready.
- *You may also use the BSB App



Savings Accounts

We're here to help you save money in a way that works for you

Regular Savings

Our savings account is a flexible and simple way to put money aside while maintaining access to your funds and earning interest

- **Competitive interest rate**
- **Online and Mobile Banking**
- **\$50 minimum deposit to open**
- **Maintain a \$50 average daily balance, and we'll waive the \$6 monthly fee**



Money Market

Our Money Market account is a great way to make your savings grow at a higher interest rate, while keeping your assets available.

- **Tiered interest rates that provide higher returns the more you save**
- **Online and Mobile Banking**
- **\$2500 minimum deposit to open**
- **Maintain a \$2500 average daily balance, and we'll waive the \$10 monthly fee**

Tandem Savings

Enjoy liquidity and high yield! Open a CD, term of 5 months or longer and a minimum balance of \$1,000, and you are eligible to open a Tandem Savings account.

- **Earns a competitive interest rate**
- **Tandem Savings requires a deposit that is equal to or less than the CD amount***
- **We offer certificates of deposit with annual percentage yields that depend on the maturity you choose**
- **Minimum balance to open is \$1,000****



Round It Up Savings

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

- **Earning a competitive interest rate**
- **Shop anywhere using your Bennington State Bank Debit Card and watch your savings grow automatically!**
- **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.***

*No additional deposits can be made in these accounts



Savings Accounts

Individual Retirement Accounts (IRA)*

Boost your savings goals with an Individual Retirement Account

- **Traditional or Roth IRAs**
- **Available as a CD (Certificate of Deposit)**
- **Anyone who has earned income is eligible**
- **Contribution rates are based on current government dictated restrictions**

CDs*

CDs are an excellent way to grow your savings with minimum risk

- **Competitive rates and terms**
- **Interest can be credited to the CD or to a BSB Checking or Savings Account**
- **Online and Mobile Banking**

Health Savings Account

Health Savings Account (HSA) are like a personal savings account designed specifically for health care expenses. Receive tax advantages when you pay for qualified medical expenses

- **Competitive interest rate**
- **Online and Mobile Banking**
- **Contact us to learn about current contribution limits**
- **Use your BSB HSA Debit Card to pay for qualified medical expenses**



* Individual Retirement Accounts and Certificates of Deposit are subject to penalty for early withdrawal. Interest payments on CDs may be automatically credited to another account. Interest payments on IRAs will be compounded. Interest rates vary according to product, term and dollar amount. Withdrawal of interest prior to maturity will reduce earnings. Renewal grace period for fixed term products is ten calendar days.

Mortgages

- ✔ Our knowledgeable loan officers provide exceptional service and customized loans to fit your individual needs
- ✔ Local servicing available on select products- make payments directly to BSB, not a third party servicer

Mortgage Lending Products

- » **Conventional**
Find the loan that works best for your homebuying situation. Various term options, fixed or adjustable rate mortgage.
- » **Construction Loan**
Build your dream home with a construction loan that offers flexible terms tailored to your project.
- » **First Time Homebuyer**
Excellent terms, rates, and down payment options for your first home.
- » **Rural Development**
Helps eligible borrowers purchase a home in rural areas with no money down options. BSB is **Champion of Rural Housing** award winner!
- » **VA Loans**
Helps veterans & active-duty service members with flexible terms and down payment options.
- » **FHA Loans**
Eligible borrowers can get into a home easier and with less money.



Mortgage Options Available

- » **Fixed Rate Mortgage**
Lock in a predictable monthly payment with a fixed rate for the life of the loan.
- » **Adjustable Rate Mortgage (ARM)**
Benefit from an interest rate that adjusts over time, offering more flexibility.

Homebuying Process

FROM PRE-QUALIFICATION TO CLOSING, BSB IS WITH YOU EVERY STEP OF THE WAY

Our loan officers can guide you through the home buying process.



LOCAL SERVICE YOU CAN COUNT ON

- ✔ A dedicated BSB loan officer will guide you through the homebuying process
- ✔ Local service means quicker communication and decisions that make sense for your unique situation
- ✔ Fast closing process
- ✔ Competitive interest rates



BENNINGTON STATE BANK

bsbks.com/loan-officers/



Home Equity

Your Home Equity is Buying Power!

Home equity is the difference between your home's market value and the amount you owe on your mortgage. With a Home Equity Loan or Home Equity Line of Credit- (HELOC)- You can borrow from your home equity for home improvements and more!



Home Equity Loan

Put the equity you've built in your home to good use!

- **Allows you to borrow money using the equity in your home as collateral**
- **Payments calculated on an amortized payment**
- **Regular monthly payment with variable interest rate**
- **Accomplish your goals using the equity in your home!**

HELOC

A Home Equity Line of Credit is a flexible funding option that taps into your home's equity.

- **HELOC can be useful if you are planning a major project with multiple expenses**
- **Flexible borrowing- access the money as you need it**
- **Variable rate**
- **Revolving line of credit**

Refinancing

Refinancing your home loan could lower your interest rate and reduce your monthly payments to help you pay off your mortgage faster. We have solutions to address your needs!

Personal Loan and Credit

We can help, no matter how big or small

Whether you are making a large purchase, consolidating bills, planning a wedding, thinking about a family vacation or remodeling your home, a personal loan from Bennington State Bank can help you out. Our knowledgeable lenders can help you get the funds you need, with a loan customized for your situation.

- **Flexible funds for your needs**
- **No minimum loan amount**
- **Variety of loan terms to help keep within your budget**
- **Competitive rates- helping you accomplish your goals**
- **Variety of collateral accepted, making it easier to get the loan you need**
- **Simple and streamlined application process**



Auto & Vehicle Loans

Competitive rates on the vehicle loan you need

Whether you are buying new or used, we will help you with a loan that will fit your budget. Get pre-qualified so when you find that perfect vehicle, you can act fast!

Auto Loans

RV, Camper, Boat, and Trailer

Loans for what you love

- **Quick approvals and pre-approvals**
- **Fast closings**
- **Financing available for new or used**
- **Competitive rates and terms**
- **Local decision making and processing**
- **Friendly service that you expect from your hometown bank**



VISA Credit Card

Personal Credit Cards

Hometown, local service & great benefits

A Credit Card where you work directly with your local BSB staff, along with receiving many rewards and benefits*.



BSB Visa® Platinum Card

Stay Connected and Earn Rewards with Visa® Platinum

- Manage your card online- make payments, set alerts, view balances, download transaction history, and more
- Earn rewards for every dollar you spend- redeem for travel, merchandise, gifts, and more
- No annual fee



BSB Visa® Classic Credit Card

Competitive Rates with no annual fee

If you're just getting started with credit, trying to reestablish credit, or just want to keep things simple, the Visa Classic card is the perfect choice for you!

- Convenience- Manage your card online or with the mobile app. Control your card, make payments, set alerts, view your balance, and more!
- Low Rates- Enjoy low rates competitive in today's market!
- No annual fee

Business Credit Cards

Get more from your business card

Choose a card that earns unlimited reward points* on everyday purchases from the bank you trust.



BSB Visa® Business Credit Card

Card Management Tools and Unlimited Reward Points

- Master Account Structure- individual cards with company and employee name
- Assign credit limits for each cards
- Choice of statement options to best fit your business needs
- Tap to Pay contactless card



BSB Visa® Purchasing Card

Automatic Cash Back and Card Management Tools

- Control Spending- Manage your company's cash flow efficiently by setting spending limits for each cardholder and tracking purchases with itemized monthly statements and reports
- Reduce time and administrative costs- Issue cards to employees to make purchases within restrictive limits without the need for traditional purchase orders and labor intensive processes
- eZBusiness Tool-Our online tool allows company admins to make payments, manage credit lines, and better manage your credit cards

*Subject to credit approval. Applicant must meet established qualifications. Terms and conditions apply.

Additional Services

Optional services available. Fees may apply.

Safe Deposit Box

Secure important documents and possessions with a safe deposit box. Availability, size, and pricing vary by location. Contents are not insured by the bank or FDIC.

Deluxe Check Reorder

You can reorder your checks quickly and securely through Deluxe. Place orders online, by phone, or at your local branch. Personalized designs and security features available.

Cashier Check

A secure, bank-issued check guaranteed by BSB for situations where guaranteed funds are required.

Wire Transfer Services

Send or receive money quickly and safely, both domestically and internationally, through our reliable wire transfer services.

Gift Cards

A convenient prepaid card option that makes gifting simple, flexible and secure for any occasion.

Foreign Currency Exchange

Order foreign currency through the bank for your upcoming international travel needs.

Money Order

A secure prepaid payment option ideal for sending guaranteed funds without using cash or a personal check.



Business Banking

Business & Commercial Banking

From checking account solutions to treasury management services, we offer a full array of business banking products designed to keep your business running smoothly.

Business Checking

Bennington State Bank offers a full suite of business banking products designed to help you manage your business and make informed financial decisions.

All Accounts Include:

- **Online & Mobile Banking**- Conveniently manage your accounts anytime with Online & Mobile Banking
- **Fraud Tools**

Small Business Checking

Specifically designed for businesses with low to moderate transaction activity

- **No monthly maintenance fee with average current balance of \$750 and eStatements**
- **100 free paper items per month**
- **\$100 minimum deposit to open**

Regular Business Checking

Perfect for high volume businesses

- **Earnings credit to help offset transaction fees and monthly maintenance fee**
- **Offers a variety of time-saving services to take your business to the next level**
- **\$100 minimum deposit to open**



Business Savings

Get the most from your hard earned money with our savings solutions. Earn interest on your funds while retaining access to your balances.

Regular Savings Account

Ideal for businesses with low minimum balance requirement

- **Competitive interest rate**
- **Online & Mobile Banking**
- **No monthly maintenance fee with \$50 average daily balance**

Money Market Account

Grow your savings at a higher rate, while keeping your assets available

- **Competitive tiered interest rate with higher returns**
- **Online & Mobile Banking**
- **No monthly maintenance fee with \$2500 average daily balance**

*Other options may be available.

Sweep Accounts

Improve cash flow by automatically transferring excess funds between your accounts

- **Optimize Cash Management with sweep accounts**
- **Automated, systematic transfer options available for a fee**



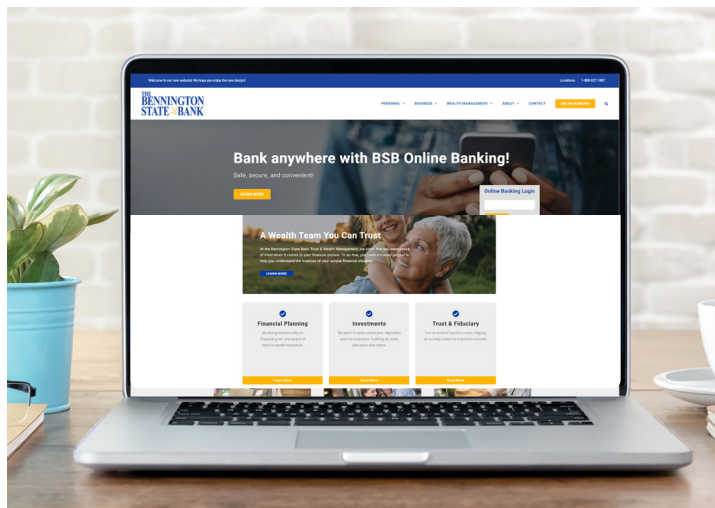
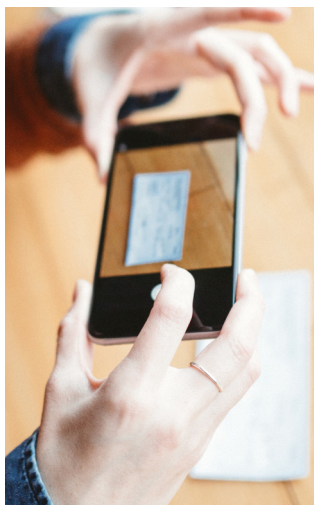
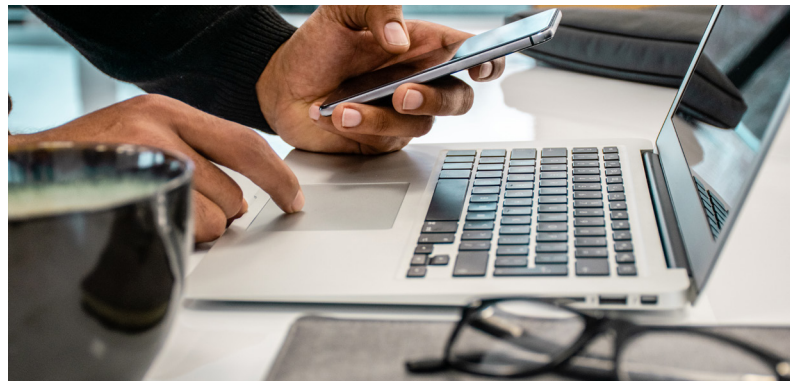
Business Banking

Online & Mobile Banking

Included with every Business Account

Manage your business accounts anywhere with BSB Online Banking and Mobile App

- View and manage account transactions
- Deposit checks with Mobile Deposit
- Set custom eAlerts
- View eStatements
- Transfer funds between accounts
- Enhanced security features
- Manage and schedule payments



Business Debit Card

Conveniently manage your everyday banking needs with a Bennington State Bank Mastercard® Business Debit Card. Our business debit card is available with every business checking account.

- **Easy and safe way to access your funds**
- **No service or transaction fees**
- **Easily view your transactions on the go with Mobile Banking**



To assist you in opening your business account, we will prefer to have the following:

Sole Proprietor/ DBA	Limited Liability Company (LLC)**	Partnership**	Non-Profit Organization	Corporation**
SSN of Owner	TIN of LLC	TIN of Partnership	TIN of Organization	TIN of Corporation
	Articles of Organization	Partnership Agreement	If Incorporated, see Corporation	Articles of Incorporation
	Operating Agreement			Bylaws
	LLC Resolution	Partnership Resolution		Corporate Resolution

Treasury Management

Our suite of Treasury Management Services can help you manage your money with less time spent banking and more time spent running your business.

ACH

Safely manage funds electronically by sending and receiving money faster, safer, and more cost-effective than paper-based transactions.

- **ACH Payroll- Efficiently pay employees**
- **ACH Receipts and ACH Payments- Improves cash flow and saves time and effort**
- **Gain greater control over your payments**
- **Offers convenience to customers**

Remote Deposit

Remote Deposit Capture can save you time and money by conveniently depositing checks from the office. *It's quick, easy, and secure!*

- **Streamlines deposit processing by sending deposits electronically**
- **Scan checks directly into your bank account using a check scanner.**
- **Increase efficiency and reduce expenses by eliminating trips to the bank**
- **File of check images available for reporting**



Wire Transfers

Wire transfers are a fast, secure, and efficient way to transfer funds. Our services make one-time and recurring payments simple and efficient.

- **Fast and efficient way to send funds**
- **Offers multiple layers of security**
- **Domestic and International transfers available**
- **Notification of payment sent or received for accurate reporting**
- **Reduces administrative time and errors**



Fraud Prevention

Positive Pay

Positive Pay reduces the risk of check fraud by alerting you of potentially fraudulent items and allows you to decide whether to pay or return.

- **Real time fraud prevention**
- **Systematically compares check number, amount and account number against an electronic file**
- **Checks that don't match are presented to you for review**

Tokens

If 2FA does not work for your business, we offer hardware security tokens to our business customers. Fees may apply.

2FA

Go beyond just a password by enabling Two Factor Authentication (2FA) to increase security on your BSB Business accounts.

- **2FA is simple, fast, flexible, and secure**
- **Extra layer of security to BSB Online and Mobile Banking**
- **Available to BSB Business Customers at no charge**

eAlerts

Set up eAlerts and stay informed of your account activity. eAlerts can be customized to notify you of selected types of account activity. Notifications are sent via email or text messages which prompts you to review your account for authenticity, putting you in control of your finances.

Treasury Management

Lockbox

Let us collect, process, and deposit payments for you! Lockbox banking streamlines the accounts receivable process and improves your cash flow.

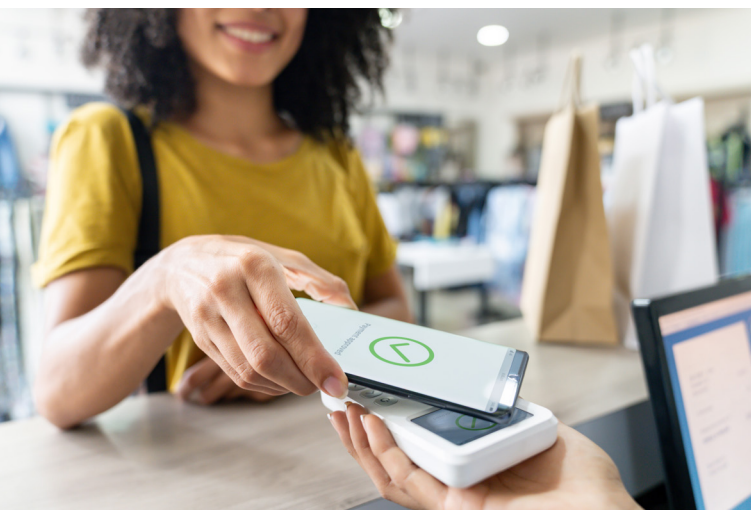
- No need to prepare deposit slips or drive to the bank
- Improve customer service and response times
- Customized for your needs
- Enhanced storage and data retention
- Same day deposits



Merchant Services

Whether your customers shop in-store, online, or over the phone, we offer a full range of advanced payment acceptance and business intelligence technologies

- Faster payment processing
- Mobile & Tablet Payments
- Point of Sale Solutions
- Contactless Payments
- Online Payment Acceptance
- eCommerce Development
- Gift & Loyalty Programs



Evolv Partnership

Bennington State Bank, in partnership with Evolv, provides a comprehensive suite of payment solutions to help you accept payments easier, faster, safer, and meet the diverse needs of your business.

Reduce Fees with Buyer's Choice

Buyer's Choice allows you to offer a dual price at checkout by automatically configuring a cash price and a card price with payment fees built in.

Example of Buyer's Choice:

If a customer was purchasing a \$100 item, when the customer is ready to purchase, two prices are offered at checkout:

1. \$100 cash price or
2. \$104 card price that has processing costs included

FDIC Insurance Sensitivity

These services are reserved for business or personal accounts sensitive to FDIC limit exposures

- ICS/CDARS: Access multi-million dollar FDIC insurance
- Repurchase Agreements



FDIC Calculator



Commercial Loans

Turn business opportunity into reality

At Bennington State Bank, it's our goal to help your business thrive. As a locally owned community bank, we are committed to funding businesses in our communities through our commercial loans and lines of credit. We realize that financing is extremely important for your business to grow, and we are here for you. Our commercial loan solutions can help you achieve your goals.

We offer commercial loans for:

- Expansion or Growth
- Acquisition opportunities
- Equipment purchases
- Operating line of credit
- Real Estate
- Working capital needs



Small Business Loans

We care about small business growth

At BSB, we realize that small businesses are the foundation of our communities as well as the backbone of the American economy. We realize that financing is extremely important for small businesses to grow and thrive, and we are here to help!

Backed by the Small Business Administration, SBA loans and lines of credit offer more flexible borrowing amounts and repayment options, which usually means lower monthly payments for you.

As a preferred SBA lender, BSB's team of experienced lenders will help you select the best loan program for your business. We can guide you through the documentation and approval process and help you get the funding you need to achieve your goals.

SBA Loan Uses:

- Working Capital
- Operating Expenses
- Equipment
- Real Estate
- Expanding business activities

SBA 7(a) Loans:

- Fund expansion, working capital, equipment
- The 7(a) loan program is the SBA's primary program for providing financial assistance to small businesses.



We can help you achieve your business goals!

Competitive Interest Rates

We offer competitive interest rates to help your business grow

Capital Availability

Our experienced commercial lenders will help get access to the funding you need

Flexible Repayment Terms

We will help you be confident that the terms of your loan are a fit for your business's cash flow

Industry Expertise

We have more than 100 years of commercial lending experience on our BSB Team!



Agriculture Loans

Ag Banking with Local Service and Support

BSB Agriculture Loans are backed by local service from lenders and bankers who understand the financial needs of farmers and agricultural businesses in our communities.

Ag Lines of Credit

- Easily draw funds directly for crop input, livestock, inventory and operating costs
- Interest is charged only on the amount you use
- Offers a variety of time-saving services to take your business to the next level

Ag Real Estate Loans

- Attractive loan rates and flexible financing or refinancing terms for farmland

Ag Equipment Loans

- Run your operation more efficiently by easily purchasing or refinancing equipment

FSA Loans

- We partner with FSA to provide attractive rates and terms for all types of operations
- We are able to offer many opportunities to family sized farmers and ranchers

Complete Banking Solutions for Farmers & Ranchers

As one of the largest agricultural lenders in Central Kansas, BSB can find the best Ag Loan for your situation.



- We partner with farmers, ranchers, and agricultural businesses to provide financial solutions for the unique needs of Agri-Businesses
- With attractive rates and flexible repayment terms, we can find the best solution for you
- Local, friendly, expert service that you expect from your hometown bank
- We offer business accounts and treasury management services to help you operate more efficiently

No matter what type of farming or livestock operation, we have the products to help you grow your business.

- Livestock Purchasing
- Farm Real Estate Loans
- Ag Lines of Credit
- Equipment Loans
- Building Improvements
- FSA Loans

LOCAL EXPERTISE AND PERSONAL SERVICE



We are here for you!

- ✓ Local lenders who understand the current agriculture economy
- ✓ Personal relationships with lenders who take the time to know your operation and goals
- ✓ Timely responses and fast closing process
- ✓ Competitive interest rates



Visit bsbks.com to contact a lender

Wealth Management

YOUR TRUSTED PARTNER IN WEALTH MANAGEMENT

At Bennington State Bank Wealth Management, we know that you want peace of mind when it comes to your financial picture. To do that, you need a trusted advisor to help you understand all of the nuances of your unique financial situation.

Our team of experienced professionals is here to help you navigate the complex world of finance and make informed decisions for your financial future.



We help our clients with: Investment Services

Bringing purpose to meeting your financial goal

- **Investment Management**

Through our portfolio construction, we build strategies for your money that match your goals. We monitor risk and performance to maximize return and minimize risk

- **Individual Retirement Account (IRA)**

Savings tool that offers tax advantages and investment opportunities to build a nest egg for retirement

- **Employer-Sponsored Retirement Plans**

We work with employers to determine the most suitable retirement plan option for their business

- **Self-Directed Investing**

For those clients that are more "DIY," we offer account options that allow for individuals to manage their investment portfolios directly, making their own decisions regarding buying and selling without the assistance of an investment manager

- **Foundations & Endowments**

Foundations and endowments play crucial roles in philanthropy and supporting various initiatives that benefit our communities

Planning

Are you on track for retirement? Your plan isn't one size fits all. We bring intentionality to financial goals and peace of mind to wealth transition.

Financial Planning

Our financial planning process evaluates your financial situation, sets achievable goals, and develops effective financial management strategies

- **Tax, retirement planning, and estate planning**
- **Income planning prior to retirement**
- **Cash flow planning during retirement**

Estate Planning

Our expert estate planning advisors ensure your assets and wealth are managed and distributed according to your wishes in the event of your death or incapacitation. Protect your families future and gain peace of mind with our personalized estate planning services.

We work with your legal counsel to:

- **Coordinate all legal, financial, and personal decisions related to your estate**
- **Minimize estate taxes for efficient asset distribution**
- **Review your existing plans and provide recommendations based on your goals**

Investment Products: Not FDIC Insured • Not a Bank Deposit • No Bank Guarantee • May Lose Value



Wealth Management

Trust & Fiduciary

You've worked hard to create a legacy, let us help make the transition smooth. We bring clarity and consistency in carrying out grantor's intentions benefiting trust beneficiaries.

- **Revocable Trust**

We work directly with the grantor on assets they choose to have us manage or hold within the trust.

- **Irrevocable Trust**

As trustees, we are legally responsible for administering the trust according to the terms and instructions outlined in the trust document and state law.

- **Testamentary Trusts**

A trust created upon the death of the individual. When created we are named trustee, and we ensure assets are managed and distributed according to the individual's wishes.

- **Estates**

A process of handling the management, protection, and distribution of assets according to the deceased individuals' wishes and legal requirements.

- **Conservatorships**

A court appointment of us as conservator to manage the financial affairs of an individual who is deemed unable to manage their affairs due to incapacity, disability, or other reasons.

- **Special Needs Trusts**

We are responsible for using the assets to supplement, not replace, government benefits by paying for goods and services that enhance the beneficiary's quality of life.

Investment Products: Not FDIC Insured • Not a Bank Deposit • No Bank Guarantee • May Lose Value

Getting Started is Easy

1

Schedule a consultation

We'll assess your financial picture and your goals to determine the best path forward.

2

Build a strategy

You'll receive a customized strategy to move forward with confidence.

3

Enjoy the life you've worked so hard to achieve

You won't have a reason to worry now that we've got your back.



A Wealth Team You Can Trust

bsbks.com

Locations & Hours

Phone: 1-888-827-1887 Fax: 785-827-7577

ABILENE

418 NW 3rd St, Abilene, KS 67410
Census Tract: 0844.00

785-571-9226

LOBBY HOURS: Mon-Fri: 9:00 AM - 3:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM

BENNINGTON

104 W Washington St, Bennington, KS 67422
Census Tract: 0856.00

785-488-3344

LOBBY HOURS: Mon-Fri: 9:00 AM - 3:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
ATM Available

MINNEAPOLIS

320 W 2nd St, Minneapolis, KS 67467
Census Tract: 0857.00

785-392-2136

LOBBY HOURS: Mon-Fri: 9:00 AM - 3:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
ATM Available

SALINA

2130 S Ohio St, Salina, KS 67401
Census Tract: 0007.00

785-827-5522

LOBBY HOURS: Mon-Fri: 9:00 AM - 4:30 PM
DRIVE-THRU: Mon-Fri: 7:30 AM - 5:30 PM
Sat: 8:30 AM - 12:30 PM

ATM Available

200 S 9th St, Salina, KS 67401

Census Tract: 0003.00

785-827-1264

LOBBY HOURS: Mon-Fri: 9:00 AM - 4:30 PM
DRIVE-THRU: Mon-Fri: 7:30 AM - 5:30 PM
Sat: 8:30 AM - 12:30 PM

ATM Available

201 E Iron Ave, Salina, KS 67401

Census Tract: 0001.02

785-827-5522

Administrative Office: No Deposits Accepted
LOBBY HOURS: Mon-Fri: 9:00 AM - 4:30 PM

ESKRIDGE

103 ½ N Main, Eskridge, KS 66423

Census Tract: 4832.00

785-449-2266

LOBBY HOURS: Mon-Thu: 8:30 AM - 4:00 PM
Fri: 8:30 AM - 5:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
Sat: 9:00 AM - 12:00 PM

ATM Available

FLINT HILLS INSURANCE

103 ½ N Main, Eskridge, KS 66423

OSAGE CITY

913 Market Street, Osage City, KS 66523

Census Tract: 0104.00

785-528-5040

LOBBY HOURS: Mon-Fri: 8:30 AM - 4:00 PM
DRIVE-THRU: Mon-Fri: 7:30 AM - 6:00 PM
Sat: 7:30 AM - 12:00 PM

ATM Available

LUCAS

132 S Main St, Lucas, KS 67648

Census Tract: 9739.00

785-525-6445

LOBBY HOURS: Mon-Fri: 9:00 AM - 3:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
ATM Available

SYLVAN GROVE

102 N Main St, Sylvan Grove, KS 67481

Census Tract: 0861.0

785-526-7155

LOBBY HOURS: Mon-Fri: 9:00 AM - 3:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
ATM Available

TOPEKA

3001 SW Wanamaker Rd, Topeka, KS 66614

Census Tract: 0036.05

785-271-1800

LOBBY HOURS: Mon-Fri: 9:00 AM - 4:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:30 PM
Sat: 9:00 AM - 12:00 PM

ATM Available

2620 SW 6th Ave, Ste A, Topeka, KS 66606

Census Tract: 0041.00

785-228-8346

LOBBY HOURS: Open by Appointment,
Mon-Fri: 9:00 AM - 4:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM

ATM Available

WAMEGO

1210 Commerce Dr, Wamego, KS 66547

Census Tract: 0002.00

785-456-1806

LOBBY HOURS: Mon-Fri: 9:00 AM - 3:00 PM
DRIVE-THRU: Mon-Fri: 7:30 AM - 5:30 PM
Sat: 8:00 AM - 12:00 PM

ATM Available

WICHITA

3954 N Ridge Rd, Wichita, KS 67205

Census Tract: 0103.01

316-867-4711

LOBBY HOURS: Mon-Fri: 8:00 AM - 4:30 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
ATM Available

HARTFORD

208 Commercial, Hartford, KS 66854

Census Tract: 0008.00

620-392-5541

LOBBY HOURS: Mon-Thu: 8:00 AM - 4:00 PM
Fri: 8:00 AM - 5:00 PM
Sat: 8:00 AM - 11:00 AM
DRIVE-THRU: Mon-Thu: 8:00 AM - 4:00 PM
Fri: 8:00 AM - 5:00 PM
Sat: 8:00 AM - 11:00 AM

ATM Available

BURLINGAME

115 S Topeka Avenue, Burlingame, KS 66413

Census Tract: 0102.00

785-654-2421

LOBBY HOURS: Mon-Fri: 8:30 AM - 4:00 PM
DRIVE-THRU: Mon-Fri: 8:00 AM - 5:00 PM
Sat: 8:30 AM - 11:30 AM

ATM Available

BENNINGTON STATE BANK

Off Premise ATMs

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

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

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

White's Foodliner
880 Lakin Street Osage City, KS
Census Tract: 0104.00

Miscellaneous Fees

Services	Bennington State Bank
Internet Reset Password	\$5.00
Outgoing Domestic Wire	\$20.00
Incoming Domestic Wire	\$10.00
International Outgoing Wire	\$55.00
International Incoming Wire	\$25.00
Special Statements	\$2.00
Statement Reprint	\$2.00
Account History	\$1.00
Statement Reconciliation (per hour)	\$20.00
Research Fee (per hour)	\$20.00
Bond Purchases for Customer	\$25.00 + Correspondent fee
Cashier's Check	\$5.00
Money Order	\$3.00
Indemnity Bond for Cashier's Check	\$25.00
Gift Card Activation	\$3.50
Copies	\$.20/page
Incoming Fax	\$1.00
Outgoing Fax	\$5.00 first page, \$1.00/additional page
ACH File Origination	\$25.00/month; Additional \$10/ month to add same day ACH services.
Safety Deposit Box	Inquire at the branch for fees and sizes available.
Garnishment Fee	\$10.00
Internet Bill Pay Fee	\$0.00

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.

Loan Portfolio Distribution as of 6/30/2023		
Loan Category	\$(000s)	%
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
Total Real Estate Loans	563,654	83.4
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
Total Loans	676,314	100.0
<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 (%)
The Bennington State Bank, Salina, Kansas	987,146	77.2
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
Subtotal	802	69.1	359	30.9	1,161	156,298	64.5	85,939	35.5	242,238
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.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
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
Total	7	4,103	0	0	871	41,581	63	38,396	941	84,080

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
Total	7	4,103	0	0	871	41,581	63	38,396	941	84,080
<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
Total	0	0	36	102	7	72	16	3,441	59	3,615
<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
Subtotal	0	0	0	0	0	0	12	3,338	12	3,338
Qualified Grants & Donations	0	0	36	102	7	72	4	103	47	277
Total	0	0	36	102	7	72	16	3,441	59	3,615

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
Total	17	30	0	1	48

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
Total	17	30	0	1	48

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&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 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.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
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
Totals	100.0	140	100.0	28,227	100.0
<i>Source: 2022 D&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.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
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
Totals	100.0	100.0	160	100.0	28,746	100.0
<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.

Geographic Distribution of Small Farm Loans					
Tract Income Level	% of Farms	#	%	\$(000s)	%
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
Totals	100.0	216	100.0	20,743	100.0
<i>Source: 2022 D&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.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$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
Total	100.0	47	100.0	7,869	100.0
<i>Source: 2022 D&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.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
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
Total	100.0	100.0	160	100.0	28,746	100.0
<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.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$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
Total	100.0	55	100.0	5,570	100.0
<i>Source: 2022 D&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.

Demographic Information of the Assessment Area					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
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&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.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
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
Total	100.0	17	100.0	1,444	100.0
<i>Source: 2022 D&B Data, Bank Data</i>					
<i>Due to rounding, totals may not equal 100.0%</i>					

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
Totals	100.0	100.0	13	100.0	2,534	100.0
<i>Source: 2020 U.S. Census, Bank Data, 2022 HMDA Aggregate Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						

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.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
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&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.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
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 35th, 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 53rd 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.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
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
Totals	100.0	17	100.0	7,303	100.0
<i>Source: 2022 D&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.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
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
Totals	100.0	100.0	78	100.0	21,469	100.0
<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.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$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
Total	100.0	17	100.0	7,303	100.0
<i>Source: 2022 D&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.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
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
Totals	100.0	100.0	78	100.0	21,469	100.0
<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.

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