

PUBLIC DISCLOSURE

March 30, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Union Savings Bank
Certificate Number: 29121

223 W Stephenson Street
Freeport, Illinois 61032

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

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

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 area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The average loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans and other lending related activities are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the prior evaluation; therefore, this criterion did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

Union Savings Bank (USB, the bank) is a \$180.6 million financial institution headquartered in Freeport, Illinois. The bank is a wholly owned subsidiary of Union Bancshares, MHC, Freeport, IL, a one-bank mutual holding company. USB was established in 1883 and is one of the oldest financial institutions serving Northern Illinois. USB operates four full-service branch locations, two in Freeport and one each in Mount Morris and Belvidere, IL. Since the previous evaluation, the bank closed a branch located in a middle-income census tract in Rockford, IL in September 2023. The FDIC assigned an Outstanding rating at the prior CRA evaluation dated July 20, 2020, using the Interagency Small Institution Examination Procedures.

The institution is predominantly a residential real estate lender offering in-house conventional fixed rate residential mortgage loans, in-house adjustable-rate mortgage loans, long-term fixed rate residential loans through the secondary market, and residential mortgage loans through government entities such as the Federal Housing Administration (FHA), the Veterans Administration (VA), and the United States Department of Agriculture (USDA) Rural Development Guaranteed Loan Program. Additionally, USB has a referral relationship with a different financial institution to also offer USDA and VA home mortgage loans. Other loan products offered by USB include commercial real estate loans, business lines of credit and equipment loans, home equity loans, overdraft lines of credit, and automobile loans.

USB also offers Federal Home Loan Bank (FHLB) down payment plus grants, up to \$6,000, to qualified first-time homebuyers, towards the purchase of their primary residence.

The bank offers traditional deposit products and services such as checking, money market, savings, certificates of deposit, health savings accounts, and retirement accounts. Additional services include safe deposit boxes, direct deposit, transfer services, night depository, online banking, overdraft protection, ATMs, and mobile banking.

As of December 31, 2025, Consolidated Report of Condition (Call Report), the bank reported approximately \$180.6 million in total assets, \$115.2 million in total loans, and \$48.2 million in total securities. Total assets increased approximately 4.2 percent since the prior evaluation, and total loans decreased 0.4 percent. Residential lending continues to represent the predominant lending segment. The following table provides detailed information about the loan portfolio.

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	766	0.7
Secured by Farmland	2,935	2.5
Secured by 1-4 Family Residential Properties	66,594	57.8
Secured by Multifamily (5 or more) Residential Properties	4,944	4.3
Secured by Nonfarm Nonresidential Properties	29,015	25.2
Total Real Estate Loans	104,254	90.5
Commercial and Industrial Loans	8,355	7.2
Agricultural Production and Other Loans to Farmers	1,248	1.1
Consumer Loans	1,354	1.2
Total Loans	115,211	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments inhibiting the bank's ability to meet assessment areas' credit needs during the review period.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires a financial institution to define one or more assessment areas within which its CRA performance will be evaluated. USB has designated two separate assessment areas within the state of Illinois: the Illinois Non-MSA assessment area, which consists of Stephenson County and eight contiguous census tracts in Ogle County, and the Rockford MSA assessment area, which consists of Boone and Winnebago Counties. The assessment areas are consistent with the requirements of the Act and do not arbitrarily exclude any low- or moderate-income (LMI) census tracts. While there have been no changes to the assessment areas, there was a census tract in Ogle County added due to census tract changes since the previous evaluation. Refer to the individual assessment areas below for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated July 20, 2020, to the current evaluation date of March 30, 2026. Examiners used the Interagency Small Institution Examination Procedures to evaluate the bank's CRA performance. Examiners conducted full-scope reviews of the bank's two assessment areas. The lending performance in the Illinois Non-MSA assessment area is weighted more heavily as the main office, two branches, and 83.4 percent of the bank's deposit base are located in this assessment area. By comparison, one branch and 16.6 percent of the bank's deposit base is located in the Rockford MSA assessment area.

Activities Reviewed

Examiners determined that USB's major product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. The loan portfolio is predominantly composed of residential home mortgage loans (57.8 percent) and commercial loans (32.4 percent). No other loan types represent a major product line; therefore, they provided no material support for conclusions or ratings and are not presented in this evaluation. The bank's record of originating home mortgage loans will be weighted more heavily than small business loans due to the volume of originations.

Examiners considered the universe of home mortgage loans reported on the bank's 2024 and 2025 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. The bank originated or purchased 65 HMDA loans totaling \$9.3 million in 2024 and 115 HMDA loans totaling \$25.2 million in 2025. The aggregate performance of all lenders required to report HMDA data within the respective assessment areas and the 2020 U.S. Census data provided a standard of comparison for USB's home mortgage loans.

The bank originated or renewed 20 small business loans in 2024 totaling \$2.3 million. Examiners analyzed the universe of small business loans originated in 2024. In 2025, the bank originated or renewed 53 small business loans totaling \$9.0 million. Examiners used a sample of 38 small business loans totaling \$5.9 million. The most recent available D&B data from 2024 and 2025 provided a standard of comparison for the bank's small business lending performance.

As previously mentioned, the institution participates in USDA Rural Development Guaranteed Loan Program. Since the previous evaluation, 245 one-to-four family mortgage loans totaling \$22.0 million were originated by USB to LMI borrowers, as defined by the program. Additionally, since the previous evaluation, \$8,000 in grant funds were used by first time homebuyers through the FHLB's Down Payment Plus Program.

Examiners reviewed the number and dollar volume of home mortgage and small business loans. While number and dollar volume of loans are presented, examiners emphasized performance by number of loans extended. The number of loans is generally a better indicator of the number of individuals and small businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

USB demonstrated reasonable performance under the Lending Test. The reasonable LTD Ratio, Assessment Area Concentration, reasonable Geographic Distribution, and excellent Borrower Profile primarily support this conclusion. Please refer to the separate analyses within each assessment area for more detail of USB's performance.

Loan-to-Deposit Ratio

USB's LTD ratio is reasonable given the institution's size, financial condition, and assessment areas' credit needs. Based on Call Report data, the average LTD over the prior 22 quarters was 66.6 percent. The average LTD ranged from a high of 78.5 percent as of September 30, 2020, to a low of 61.5 percent as of December 31, 2021.

The following table reflects the bank's average net LTD ratio is higher than one similarly situated institution (SSI), and lower than three SSIs. Examiners selected these institutions based on similar asset size, geographic location, and lending focus.

LTD Ratio Comparison		
Bank	Total Assets as of 12/31/2025 (\$000s)	Average LTD Ratio (%)
Union Savings Bank	180,555	66.6
SSI #1	360,089	67.8
SSI #2	311,595	83.8
SSI #3	298,738	94.4
SSI #4	69,434	49.8
Source: Reports of Condition and Income 09/30/2020 – 12/31/2025		

Assessment Area Concentration

Overall, a majority of home mortgage and small business loans by number are inside the institution's assessment areas. The table below details the percentages by number and dollar volume within and outside the assessment areas for each loan product reviewed.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2024	61	93.8	4	6.2	65	8,541	91.4	808	8.6	9,349
2025	98	85.2	17	14.8	115	21,643	85.8	3,594	14.2	25,237
Subtotal	159	88.3	21	11.7	180	30,184	87.3	4,402	12.7	34,586
Small Business										
2024	16	80.0	4	20.0	20	1,716	75.1	569	24.9	2,285
2025	34	89.5	4	10.5	38	5,035	84.7	910	15.3	5,945
Subtotal	50	86.2	8	13.8	58	6,751	82.0	1,479	18.0	8,230
Source: Imported Bank Data. Due to rounding, totals may not equal 100.0%.										

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the assessment areas. Only loans originated in the assessment areas were considered in the analysis. USB's reasonable performance within home mortgage and small business lending supports this conclusion. Examiners focused on the percentage by number of loans in LMI census tracts. Please refer to each assessment area for a detailed discussion of the institution's performance.

Borrower Profile

The distribution of home mortgage and small business loans reflects excellent penetration among borrowers of different income levels and businesses of different sizes within the assessment areas. The bank's excellent record of home mortgage and small business lending, in the Illinois Non-MSA assessment area primarily supports this conclusion. Examiners focused on the percentage by number of home mortgage loans to LMI borrowers, and the percentage by number of small business loans to businesses with gross annual revenues of \$1 million or less. Only loans originated in the assessment areas were considered in the analysis. Please refer to the separate conclusions under each assessment area for more information.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

ILLINOIS NON-MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ILLINOIS NON-MSA ASSESSMENT AREA

The bank’s Illinois Non-MSA assessment area consists of Stephenson County and eight contiguous census tracts in Ogle County, in rural northern Illinois. USB’s main office in Freeport, two full-service branches located in Freeport and Mount Morris (Ogle County) and 83.4 percent of the deposit base are in this assessment area. No material changes have been made to the assessment area since the previous evaluation. Nor has the bank opened or closed any branches in this assessment area. Additional information regarding the branch and ATM distribution within this assessment area is shown in the following table.

Branch and ATM Distribution by Geography Income Level								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	2	9.5	4,608	6.1	1	33.3	2	40.0
Moderate	3	14.3	10,598	14.1	1	33.3	2	40.0
Middle	11	52.4	41,371	54.9	1	33.3	1	20.0
Upper	5	23.8	18,718	24.9	0	0.0	0	0.0
Total	21	100.0	75,295	100.0	3	100.0	5	100.0
<i>Source: 2020 U.S. Census Data and Institution Records, SOD data (as of 6/30/2025)</i>								

Economic and Demographic Data

Based on 2020 U.S. Census data, the assessment area includes 21 census tracts, consisting of two low-income, three moderate-income, eleven middle-income, and five upper-income. Compared to the 2015 American Community Survey (ACS) data used at the last evaluation, the assessment area has one additional low-income census tract. Additionally, in 2024, four census tracts in Ogle County were considered distressed nonmetropolitan middle-income geographies due to high unemployment rates. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Illinois Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	21	9.5	14.3	52.4	23.8	0.0
Population by Geography	75,295	6.1	14.1	55.0	24.9	0.0
Housing Units by Geography	35,984	7.6	14.4	55.3	22.7	0.0
Owner-Occupied Units by Geography	23,466	4.5	11.6	59.7	24.2	0.0
Occupied Rental Units by Geography	9,186	13.8	21.6	45.7	18.9	0.0
Vacant Units by Geography	3,332	12.3	14.3	50.5	22.9	0.0
Businesses by Geography	5,805	11.2	13.1	53.4	22.3	0.0
Farms by Geography	544	1.3	1.1	82.9	14.7	0.0
Family Distribution by Income Level	21,050	18.7	17.2	22.3	41.9	0.0
Household Distribution by Income Level	32,652	23.0	14.5	18.7	43.8	0.0
Illinois Non-MSA Median Family Income		\$67,835	Median Housing Value			\$ 120,919
			Median Gross Rent			\$667
			Families Below Poverty Level			9.6%
Source: 2020 Census and 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

Housing units in the assessment area consist of 65.2 percent owner-occupied, 25.5 percent occupied rental units, and 9.3 percent vacant units. The bank's performance under the Geographic Distribution criterion compares home mortgage loans to the percentage of owner-occupied units within geographies by income level.

LMI families account for 18.7 percent and 17.2 percent of the families in the AA, respectively, or 35.9 percent combined, with 9.6 percent of families below the poverty level. The Federal Financial Institutions Examination Council (FFIEC)-updated median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The following table contains information on the median family income by category.

Median Family Income Ranges- Illinois Non-MSA Assessment Area				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Illinois Non-MSA Median Family Income				
2025 (\$86,600)	<\$43,300	\$43,300 To <\$69,280	\$69,280 To <\$103,920	≥\$103,920
2024 (\$82,800)	<\$41,400	\$41,400 To <\$66,240	\$66,240 To <\$99,360	≥\$99,360
<i>Source: FFIEC</i>				

According to 2025 D&B data, 6,349 businesses (5,805 non-farm and 544 farm) operate in the assessment area. 85.9 percent of businesses reported gross annual revenues of \$1 million or less. The percentage of businesses with gross annual revenues of less than \$1 million in the assessment area indicates that opportunities exist to extend loans to small businesses.

Among all farm and non-farm businesses, non-classifiable establishments are the largest part of businesses (11.9 percent), followed by other services, (11.2 percent), and farming (8.6 percent). In addition, 70.9 percent of businesses in the assessment area have four or fewer employees, and 89.6 percent operate from a single location. The analysis of small business loans under the Geographic Distribution criterion compares the loans to the percentage of businesses within geographies by income level, while the analysis under the Borrower Profile criterion compares the loans to the distribution of businesses by gross annual revenues. The most recent D&B data for 2024 and 2025 provides a standard of comparison when measuring small business lending performance.

The unemployment rates in the assessment area since the last evaluation have been relatively stable and are higher than the national average. The following table outlines the average annual (not seasonally adjusted) unemployment rates in the bank’s assessment area during the review period.

Unemployment Rates				
Area	2022	2023	2024	2025
	%	%	%	%
Ogle County	4.8	5.2	5.0	4.5
Stephenson County	4.6	5.0	4.8	4.4
State	4.6	4.5	5.0	4.6
National Average	3.6	3.6	4.0	4.2
<i>Source: Bureau of Labor Statistics</i>				

Competition

The assessment area is moderately competitive in the financial services market. According to the FDIC Deposit Market Share report, as of June 30, 2025, 18 financial institutions operated 37 offices within Ogle and Stephenson counties. Of these institutions, USB ranked tenth with 4.7 percent deposit market share.

Home mortgage lending is competitive in the assessment area among banks, credit unions, and non-depositor mortgage lenders. The most recent HMDA data from 2024 reflects 162 lenders reported 1,257 home mortgage originations and purchases. USB ranked seventh, capturing 3.3 percent of the market share. The top five lenders captured 29.9 percent of the market share by number of loans. This performance context factor is a measure of demand and indicates a competitive market for originating or purchasing home mortgage loans in the assessment area.

USB is not required to collect or report CRA small business data pursuant to the reporting requirement of the CRA. The most recent aggregate CRA data from 2024 reflects 52 lenders reported a total of 1,032 originated or purchased small business loans totaling \$28.1 million within the bank’s assessment area. The top three lenders accounted for 53.0 percent of all reported small business loans by number. This performance context factor is a measure of demand and indicates a competitive market for originating or purchasing small business loans in the assessment area.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment areas to help in identifying the credit needs. This information provides additional insight into the opportunities available and aids in deciding whether institutions are responsive to the credit needs of the assessment areas. Examiners conducted a community contact with an individual from an economic development organization. The contact noted a need for affordable housing, particularly first-time homebuyer programs. Contact also identified a need for small business SBA programs. Examiners also reviewed a recent community contact with an individual from a housing organization. The contact also stated there is a need for affordable housing in the area, financial literacy, budgeting, and managing the health and wellness of families.

Credit Needs

Considering information from the community contacts and demographic and economic data, examiners determined that home mortgage loans, particularly those financing affordable housing, and small business loans are the primary needs of the assessment area. Affordability issues noted from the community contacts support the need for affordable housing lending. Small business lending opportunities and demand are also significant throughout the area, as 85.9 percent of businesses have gross annual revenues of \$1 million or less.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ILLINOIS NON-MSA ASSESSMENT AREA

LENDING TEST

USB demonstrated reasonable performance under the Lending Test in the Illinois Non-MSA assessment area. The bank's reasonable geographic distribution and excellent borrower profile performance for home mortgage and small business lending supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's performance in both home mortgage and small business lending supports this conclusion. USB's main office and the full-service branch in Freeport are located in LMI census tracts, and are near the five LMI census tracts in Stephenson County. There are no LMI census tracts in Ogle County, the location of USB's Mount Morris branch.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout this assessment area. The following table reflects the distribution of home mortgage loans by census tract income level.

Geographic Distribution of Home Mortgage Loans Illinois Non-MSA						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2024	4.5	2.6	0	0.0	0	0.0
2025	4.5	--	3	6.1	181	2.5
Moderate						
2024	11.6	13.8	9	22.0	535	10.6
2025	11.6	--	3	6.1	140	2.0
Middle						
2024	59.7	56.0	25	61.0	3,353	66.2
2025	59.7	--	36	73.5	5,599	77.9
Upper						
2024	24.2	27.7	7	17.1	1,174	23.2
2025	24.2	--	7	14.3	1,267	17.6
Total						
2024	100.0	100.0	41	100.0	5,062	100.0
2025	100.0	--	49	100.0	7,187	100.0
Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data 2025 HMDA Aggregate Data is not available. Due to rounding, totals may not equal 100.0%.						

The bank did not originate loans in low-income census tracts in 2024. The percentage of owner-occupied units indicates limited lending opportunities in these census tracts. Aggregate lending in 2024 reflects that 2.6 percent of owner-occupied mortgage loans were in low-income census tracts, further supporting limited lending opportunities. In 2025, the bank originated three loans and exceeded the demographic figure.

The bank's lending in moderate-income census tracts in 2024 exceeded both the demographic and aggregate figures. While lending decreased in 2025 in moderate-income census tracts, overall performance is reasonable.

Small Business Loans

The geographic distribution of small business loans represents reasonable dispersion throughout the assessment area. Performance is compared to the location of businesses by census tract income level (demographic). The following table reflects the distribution of small business loans by census tract income level.

Geographic Distribution of Small Business Loans Illinois Non-MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2024	11.2	1	11.1	67	14.2
2025	11.2	1	5.6	11	0.9
Moderate					
2024	13.0	0	0.0	0	0.0
2025	13.1	3	16.7	182	14.6
Middle					
2024	53.1	8	88.9	404	85.8
2025	53.4	14	77.8	1,053	84.5
Upper					
2024	22.7	0	0.0	0	0.0
2025	22.3	0	0.0	0	0.0
Total					
2024	100.0	9	100.0	471	100.0
2025	100.0	18	100.0	1,246	100.0
Source: 2025, 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.					

The bank's performance in low-income census tracts was in line with demographic figures in 2024, while trailing the demographic in 2025. The bank did not originate any loans in moderate income census tracts in 2024 but exceeded demographic figures in 2025. Taken together, the bank's performance is reasonable overall.

Borrower Profile

The distribution of borrowers reflects excellent penetration among individuals of different income levels and businesses of different sizes, given the demographics of the assessment area. Only loans originated in the assessment area were considered in the analysis.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including LMI borrowers is excellent. The following table reflects the distribution of home mortgage loans by borrowers' income level.

Distribution of Home Mortgage Loans by Borrower Income Level Illinois Non-MSA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2024	18.7	10.6	6	14.6	446	8.8
2025	18.7	--	7	14.3	316	4.4
Moderate						
2024	17.2	22.8	12	29.3	1,145	22.6
2025	17.2	--	11	22.5	1,151	16.0
Middle						
2024	22.3	22.0	12	29.3	1,506	29.8
2025	22.3	--	10	20.4	2,089	29.1
Upper						
2024	41.9	29.8	11	26.8	1,965	38.8
2025	41.9	--	21	42.9	3,631	50.5
NA						
2024	0.0	14.8	0	0.0	0	0.0
2025	0.0	--	0	0.0	0	0.0
Total						
2024	100.0	100.0	41	100.0	5,062	100.0
2025	100.0	--	49	100.0	7,187	100.0
Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data 2025 HMDA Aggregate Data is not available. Due to rounding, totals may not equal 100.0%.						

USB's overall performance to low-income borrowers exceeded aggregate lending as reflected in the above table. Although in 2024 the bank's lending performance to low-income borrowers trailed demographic data, 9.6 percent of low-income families have incomes below the poverty level. These families often face significant challenges in qualifying for home mortgages. Also, the fact that aggregate lending trails demographic data for low-income families supports the assessment that lenders face certain challenges when serving this demographic in this market. While aggregate data was not available for 2025, the bank's performance to low-income borrowers was similar in 2025 as well.

As previously mentioned, through government programs, the bank offers USDA loans that are conducive to low-income borrowers. While not included above, during the review period, the bank also originated 193 mortgage loans totaling \$16.8 million to LMI borrowers, as defined by the USDA Rural Development Program, in this assessment area.

USB's performance to moderate-income borrowers exceeded demographic and aggregate figures in 2024 and exceeded the demographic in 2025. Given the aforementioned factors, overall performance is excellent.

Small Business Loans

The distribution of loans to businesses of different sizes is excellent. USB originated 88.9 percent of its loans to businesses with gross annual revenues of \$1 million or less in both 2024 and 2025, exceeding the demographic of 85.4 percent and 85.9 percent, respectively.

Demographics are not necessarily reflective of the opportunities for lending in each revenue category as they include businesses that exist but are not necessarily seeking or may not qualify for financing. In addition, very small businesses typically seek financing through non-traditional sources, such as credit cards.

As a measure of demand, aggregate small business lending was considered but not directly compared to the bank's performance. Aggregate small business lending for 2024 reflects that 59.6 percent of small business loans originated in the assessment area by reporting banks were to businesses with gross annual revenues of \$1 million or less. USB's lending performance significantly exceeded aggregate performance. Aggregate small business loan data for 2025 is not yet available.

Examiners also compared USB's small business lending performance to a similarly situated financial institution in the assessment area. The institution's percentage of small business loans to businesses with GARs of \$1 million or less in 2024 was 86.7 percent, which was considered as excellent performance. USB's performance in 2024 and 2025 exceeds the performance of this similarly situated institution.

Distribution of Small Business Loans by Gross Annual Revenue Category Illinois Non-MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2024	85.4	8	88.9	404	85.8
2025	85.9	16	88.9	1,075	86.3
> \$1,000,000					
2024	3.5	1	11.1	67	14.2
2025	3.2	2	11.1	171	13.7
Revenue Not Available					
2024	11.1	0	0.0	0	0.0
2025	10.9	0	0.0	0	0.0
Total					
2024	100.0	9	100.0	471	100.0
2025	100.0	18	100.0	1,246	100.0
<i>Source: 2025, 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

ROCKFORD MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ROCKFORD MSA

The Rockford MSA assessment area includes all census tracts in Boone and Winnebago counties, in far northern Illinois. The assessment area includes whole geographies and does not arbitrarily exclude LMI census tracts. There have not been any changes in the assessment area since the previous evaluation. The bank operates one full-service branch in Belvidere, IL. USB closed its branch in Rockford, IL in September 2023. Additional information regarding the branch and ATM distribution within the Rockford MSA is shown below.

Branch and ATM Distribution by Geography Income Level								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	8	8.9	19,390	5.7	0	0.0	0	0.0
Moderate	27	30.0	88,519	26.1	1	100.0	1	100.0
Middle	26	28.9	113,230	33.4	0	0.0	0	0.0
Upper	26	28.9	113,804	33.6	0	0.0	0	0.0
NA	3	3.3	3,855	1.1	0	0.0	0	0.0
Total	90	100.0	338,798	100.0	1	100.0	1	100.0
<i>Source: 2020 U.S. Census Data and Institution Records, SOD data (as of 6/30/2024)</i>								

Economic and Demographic Data

Based on 2020 U.S. Census data, the assessment area includes 90 census tracts, consisting of eight low-income, 27 moderate-income, 26 middle-income, 26 upper-income, and three census tracts with no income designation. Compared to the 2015 ACS data used at the last evaluation, the assessment area has six additional census tracts, five fewer low-income census tracts, eight additional moderate-income census tracts, one less middle- and upper-income census tracts, and one less census tract with no income designation. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area Rockford MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	90	8.9	30.0	28.9	28.9	3.3
Population by Geography	338,798	5.7	26.1	33.4	33.6	1.1
Housing Units by Geography	145,782	6.8	27.3	32.7	31.8	1.4
Owner-Occupied Units by Geography	91,376	3.1	21.3	34.5	40.9	0.3
Occupied Rental Units by Geography	43,191	12.7	37.8	30.9	15.2	3.4
Vacant Units by Geography	11,215	14.3	36.2	24.5	21.5	3.6
Businesses by Geography	27,232	4.9	25.0	30.4	37.1	2.7
Farms by Geography	490	2.5	8.0	13.7	75.3	0.6
Family Distribution by Income Level	87,825	21.8	17.2	19.5	41.5	0.0
Household Distribution by Income Level	134,567	24.1	16.3	17.7	42.0	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$69,881	Median Housing Value			\$ 121,421
			Median Gross Rent			\$828
			Families Below Poverty Level			10.8%
Source: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

Housing units in the assessment area consist of 62.7 percent owner-occupied, 29.6 percent occupied rental units, and 7.7 percent vacant units. The bank's performance under the Geographic Distribution criterion compares home mortgage loans to the percentage of owner-occupied units within geographies by income level.

LMI families account for 21.8 percent and 17.2 percent of the families in the AA, or 39.0 percent combined, with 10.8 percent of families below the poverty level. The bank's performance under the Borrower Profile criterion compares home mortgage loans to the percentage of families by income level. The FFIEC-updated median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The following table contains information on the median family income by category.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
Rockford, IL MSA Median Family Income (40420)				
2025 (\$86,400)	<\$43,200	\$43,200 To <\$69,120	\$69,120 To <\$103,680	≥\$103,680
2024 (\$89,000)	<\$44,500	\$44,500 To <\$71,200	\$71,200 To <\$106,800	≥\$106,800
<i>Source: FFIEC</i>				

According to 2025 D&B data, 27,722 businesses (27,232 non-farm and 490 farm) operate in the assessment area. 86.2 percent of businesses reported gross annual revenues of \$1 million or less. The percentage of businesses with gross annual revenues of less than \$1 million in the assessment area indicates that opportunities exist to extend loans to small businesses.

Among all farm and non-farm businesses, non-classifiable establishments are the largest part of businesses (14.6 percent), followed by other services, (11.2 percent), and construction (8.9 percent). In addition, 68.4 percent of businesses in the assessment area have four or fewer employees, and 89.7 percent operate from a single location. The analysis of small business loans under the Geographic Distribution criterion compares the loans to the percentage of businesses within geographies by income level, while the analysis under the Borrower Profile criterion compares the loans to the distribution of businesses by gross annual revenues level. The most recent D&B data for 2024 and 2025 provides a standard of comparison when measuring small business lending performance.

The unemployment rates in the assessment area since the last evaluation have been relatively stable and are higher than the state and national average. The following table outlines the average annual (not seasonally adjusted) unemployment rates in the bank's assessment area during the review period.

Unemployment Rates				
Area	2022	2023	2024	2025
	%	%	%	%
Boone County	6.2	6.6	5.8	5.2
Winnebago County	6.0	6.1	5.6	5.1
State	4.6	4.5	5.0	4.6
National Average	3.6	3.6	4.0	4.2
<i>Source: Bureau of Labor Statistics</i>				

Competition

The assessment area is moderately competitive in the financial services market. According to the FDIC Deposit Market Share report, as of June 30, 2025, 21 financial institutions operated 71 offices within Boone and Winnebago counties. Of these institutions, USB ranked 19th with 0.3 percent deposit market share.

Home mortgage lending is competitive in the assessment area among banks, credit unions, and non-depositor mortgage lenders. The most recent HMDA data from 2024 reflects 326 lenders reported 7,708 home mortgage originations and purchases. USB ranked 56th, capturing less than 0.3 percent of the market share. The top five lenders captured 30.2 percent of the market share by number of loans. This performance context factor is a measure of demand and indicates a highly competitive market for originating or purchasing home mortgage loans in the assessment area.

USB is not required to collect or report CRA small business data pursuant to the reporting requirement of the CRA. The most recent aggregate CRA data from 2024 reflects 73 lenders reported a total of 5,067 originated or purchased small business loans totaling \$209.5 million within the bank's assessment area. The top three lenders accounted for 51.1 percent of all reported small business loans by number. This performance context factor is a measure of demand and indicates a competitive market for originating or purchasing small business loans in the assessment area.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to help in identifying the credit needs. This information provides additional insight into the opportunities available and aids in deciding whether institutions are responsive to the credit needs of the assessment areas. Examiners conducted a community contact with an individual from a housing organization, who noted a need for affordable housing, particularly rental housing, for low-income families.

Credit Needs

Considering information from the community contacts and demographic and economic data, examiners determined that home mortgage loans, particularly those financing affordable housing, and small business loans are the primary needs of the assessment area. Affordability issues noted by the community contact support the need for affordable housing lending. Small business lending opportunities and demand are also significant throughout the area, as 86.2 percent of businesses have gross annual revenues of \$1 million or less.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ROCKFORD MSA ASSESSMENT AREA

LENDING TEST

USB lending performance reflects reasonable performance to the credit needs in the Rockford MSA assessment area. The Geographic Distribution and Borrower Profile performance for home mortgage and small business lending supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's performance in both home mortgage and small business lending supports this conclusion. Only loans originated inside this assessment area are included in the analyses.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout this assessment area. The following table reflects the distribution of home mortgage loans by census tract income level.

Geographic Distribution of Home Mortgage Loans Rockford MSA						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2024	3.1	3.4	0	0.0	0	0.0
2025	3.1	--	5	10.2	1,668	11.5
Moderate						
2024	21.3	24.2	5	25.0	622	17.9
2025	21.3	--	21	42.9	4,576	31.7
Middle						
2024	34.5	34.3	9	45.0	1,181	34.0
2025	34.5	--	9	18.4	3,584	24.8
Upper						
2024	40.9	37.9	6	30.0	1,676	48.2
2025	40.9	--	14	28.6	4,628	32.0
NA						
2024	0.3	0.2	0	0.0	0	0.0
2025	0.3	--	0	0.0	0	0.0
Total						
2024	100.0	100.0	20	100.0	3,479	100.0
2025	100.0	--	49	100.0	14,456	100.0
Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data 2025 HMDA Aggregate Data is not available. Due to rounding, totals may not equal 100.0%.						

USB did not originate any home mortgage loans in low-income census tracts in 2024. The bank originated 10.2 percent of its loans in low-income census tracts in 2025, exceeding the demographic figure. The bank's sole location in this assessment area is located approximately 13 miles away from the nearest cluster of low-income census tracts. Additionally, the cluster of low-income census tracts is located in Rockford, IL, a major metropolitan city, which represents significant competition for the bank.

The bank lending within moderate-income tracts exceeded the demographic and aggregate data in 2024 and significantly exceeded demographic data in 2025. Considering the distance from low-income census tracts and strong lending in moderate-income census tracts, overall performance is reasonable.

Small Business Loans

The geographic distribution of small business loans represents reasonable dispersion throughout the assessment area. Performance is compared to the location of businesses by census tract income level (demographic). The following table reflects the distribution of small business loans by census tract income level.

Geographic Distribution of Small Business Loans Rockford MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2024	4.9	0	0.0	0	0.0
2025	4.9	0	0.0	0	0.0
Moderate					
2024	24.9	2	28.6	150	12.1
2025	25.0	6	37.5	1,523	40.2
Middle					
2024	30.5	1	14.3	496	39.8
2025	30.4	1	6.3	780	20.6
Upper					
2024	36.9	4	57.1	599	48.1
2025	37.1	9	56.3	1,486	39.2
NA					
2024	2.8	0	0.0	0	0.0
2025	2.7	0	0.0	0	0.0
Total					
2024	100.0	7	100.0	1,245	100.0
2025	100.0	16	100.0	3,789	100.0

Source: 2025, 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.

The bank did not originate any small business loans in low-income census tracts in 2024 and 2025. As previously mentioned, the bank's sole location in this assessment area is approximately 13 miles from the largest cluster of low-income census tracts located in Rockford, IL. Many of the assessment area's major industries are located in Rockford, IL and given the distance from the bank's sole location, competition is heavy.

USB's lending performance in 2024 in moderate-income census tracts exceeded demographic and aggregate figures. The bank's performance also exceeded demographic in 2025. While the bank did not originate loans in low-income census tracts during the review period, the bank's strong performance in moderate-income tracts supports overall reasonable performance.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, given the demographics of the assessment area. The bank's reasonable performance of home mortgage and small business lending supports this conclusion. Only loans originated in the assessment area were considered in the analysis.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including LMI borrowers, is reasonable. The following table reflects the distribution of home mortgage loans by borrowers' income level.

Distribution of Home Mortgage Loans by Borrower Income Level Rockford MSA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2024	21.8	10.9	1	5.0	115	3.3
2025	21.8	--	0	0.0	0	0.0
Moderate						
2024	17.2	23.5	5	25.0	546	15.7
2025	17.2	--	6	12.2	763	5.3
Middle						
2024	19.5	23.3	5	25.0	833	23.9
2025	19.5	--	7	14.3	1,041	7.2
Upper						
2024	41.5	26.7	8	40.0	1,768	50.8
2025	41.5	--	14	28.6	5,618	38.9
NA						
2024	0.0	15.7	1	5.0	217	6.2
2025	0.0	--	22	44.9	7,034	48.7
Total						
2024	100.0	100.0	20	100.0	3,479	100.0
2025	100.0	--	49	100.0	14,456	100.0
Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data 2025 HMDA Aggregate Data is not available. Due to rounding, totals may not equal 100.0%.						

USB originated one loan to a low-income borrower in the review period, trailing aggregate and demographic. Although the bank trailed demographic in 2024, 10.8 percent of families have incomes below the poverty level. These families face significant challenges in qualifying for home mortgages. Also, the fact that aggregate lending trailed demographic data for low-income families supports the assessment that lenders face certain challenges when serving this market. As previously mentioned, through government programs, the bank offers USDA loans that are conducive to low-income borrowers. During the review period, the bank originated 52 mortgage loans totaling \$5.2 million to LMI borrowers, as defined by the USDA Rural Development Program, in this AA.

USB's performance to moderate-income borrowers exceeded demographic and aggregate figures in 2024 and trailed the demographic data in 2025. Given the challenges in serving low-income borrowers

and the bank's reasonable performance to moderate-income borrowers, overall performance is reasonable.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. USB's small business loans were evaluated based on lending concentration to businesses with gross annual revenues of \$1 million or less (demographic) in the assessment area. The following table reflects the distribution of small business loans by revenue level.

Distribution of Small Business Loans by Gross Annual Revenue Category Rockford MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2024	85.5	6	85.7	1,170	94.0
2025	86.2	11	68.8	1,308	34.5
> \$1,000,000					
2024	4.4	1	14.3	75	6.0
2025	3.9	5	31.3	2,481	65.5
Revenue Not Available					
2024	10.1	0	0.0	0	0.0
2025	9.9	0	0.0	0	0.0
Total					
2024	100.0	7	100.0	1,245	100.0
2025	100.0	16	100.0	3,789	100.0
<i>Source: 2025, 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

The distribution of loans to businesses of different sizes is reasonable. USB's performance met the demographic figure in 2024 but lending decreased in 2025 and trailed the demographic.

Demographics are not necessarily reflective of the opportunities for lending in each revenue category as they include businesses that exist but are not necessarily seeking or may not qualify for financing. In addition, very small businesses typically seek financing through non-traditional sources, such as credit cards.

As a measure of demand, aggregate small business lending was considered but not directly compared to the bank's performance. Aggregate small business lending for 2024 reflects that 51.8 percent of small business loans originated in the assessment area by reporting banks were to businesses with gross annual revenues of \$1 million or less. USB's lending performance significantly exceeded aggregate performance. Given the bank's strong performance in 2024 and overall low volume of lending, overall performance is reasonable.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

- 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 institution's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

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