

PUBLIC EVALUATION

June 18, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Oregon Pacific Bank
RSSD # 160360**

**1355 Highway 101
Florence, Oregon 97439**

**Federal Reserve Bank of San Francisco
101 Market Street
San Francisco, California 94105**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the 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 Community Reinvestment Act (CRA) Rating

Oregon Pacific Bank is rated "SATISFACTORY"

The major factors supporting the institution's rating include:

- A reasonable loan-to-deposit ratio;
- A substantial majority of loans originated within the bank's assessment areas;
- A reasonable geographic distribution of small business and home mortgage loans; and
- An excellent distribution of loans among borrowers of different income levels and businesses of different sizes

INSTITUTION

Description of Institution

Oregon Pacific Bank (OPB), with assets of 278.2 million as of March 31, 2018, is a wholly-owned subsidiary of Oregon Pacific Bancorp. OPB is a full service community bank that operates four offices within the state of Oregon located in Coos Bay, Eugene, Florence, and Roseburg. OPB also operates a stand-alone trust office in Medford, Oregon.

OPB offers a wide range of commercial loan products, including Small Business Administration (SBA) loans. The bank also offers residential mortgage loans and other consumer loan products, as well as deposit products including checking, money market, savings, certificates of deposit, and non-reloadable gift cards. Wealth management and brokerage services are offered to customers in California, Oregon and Washington.

As depicted in Exhibit 1 below, commercial loans represent the majority of the bank’s loan portfolio as of December 31, 2017. While OPB originates loans secured by 1-4 family residential real estate, these loans reflect a smaller portion of the portfolio as OPB acts as a broker for many mortgage originations.

EXHIBIT 1 LOANS AND LEASES AS OF DECEMBER 31, 2017		
Loan Type	\$ ('000s)	%
Commercial/Industrial & Non-Farm Non-Residential Real Estate	133,337	69.1
Secured by 1-4 Family Residential Real Estate	28,604	14.8
Construction & Land Development	13,526	7.0
All Other	10,490	5.4
Multi-Family Residential Real Estate	3,727	1.9
Farm Land & Agriculture	2,059	1.1
Consumer Loans & Credit Cards	1,194	0.6
Total (Gross)	192,937	100.0

As a result of the opening of the Eugene branch on July 6, 2015, OPB expanded its assessment area to include the city of Eugene and the eastern portions of Lane County. The bank now operates with the following assessment areas:

- Florence Assessment Area, which consists of six census tracts in Lane County, two census tracts in Douglas County, and one census tract in Lincoln County;
- Eugene Assessment Area, which consists of eighty census tracts in the eastern portions of Lane County;
- Coos Bay Assessment Area, which consists of Coos County in its entirety and is composed of 13 census tracts; and
- Roseburg Assessment Area, which consists of 19 census tracts in Douglas County.

OPB did not face any legal or financial impediments during the review period that would have prevented it from helping to meet the credit needs of its assessment areas consistent with its business strategy, size, financial capacity, and local economic conditions. The bank received a satisfactory rating at its previous CRA examination, which was conducted on April 7, 2014, by the Federal Reserve Bank of San Francisco using the *Interagency Small Institution CRA Examination Procedures*.

Scope of Examination

OPB's CRA performance was evaluated in accordance with the *Interagency Small Institution CRA Examination Procedures*. In accordance with these procedures, the bank's performance was evaluated using the lending test, which consists of the evaluation of the following performance criteria:

- Loan volume compared to deposits (Loan-to-Deposit Ratio);
- Lending inside versus outside the assessment area (Lending in Assessment Area);
- Dispersion of lending throughout the assessment area (Lending Distribution by Geography); and
- Lending to business of different sizes and borrowers of different income levels (Lending Distribution by Business Revenue and Borrower Income).

Responsiveness to consumer complaints was not evaluated as OPB did not receive any CRA-related complaints during the review period.

The majority of the bank's lending activities are concentrated in Florence and Eugene. As such, these assessment areas received full-scope reviews, whereas limited-scope reviews were performed for Coos Bay and Roseburg. The Florence assessment area received greater weight in the analysis given its broader range of lending activities and location of bank headquarters.

The lending test evaluation was based on a universe of 174 home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) originated from January 1, 2014 through December 31, 2017, and a sample of 51 of 69 small business loans originated from July 1, 2017 through December 31, 2017. Given the annual volume of small business loans relative to home mortgage loans, small business loan were weighted more heavily in this analysis.

The Florence assessment area review included small business lending, home purchase lending, and home refinance lending. Home improvement and multifamily loans were considered in the analysis; however, there was insufficient volume to provide meaningful analysis.

Similarly, home mortgage lending levels in the Eugene assessment area were considered, but volumes were insufficient to provide meaningful analysis. As such, the review of the Eugene assessment area focused on small business lending.

Lending volumes in the limited-scope assessment areas were limited and did not impact the overall analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

OPB's overall lending performance is satisfactory. The bank's loan-to-deposit ratio is reasonable and OPB extended a substantial majority of its loans within its assessment areas. In addition, the geographic distribution of small business loans and home mortgage loans is reasonable. Finally, the distribution of lending to businesses of different revenue sizes is excellent and the distribution of home mortgage loans to borrowers of different income levels is reasonable.

Loan-to-Deposit Ratio

OPB's loan-to-deposit ratio is reasonable. As of March 31, 2018, the 17-quarter average of this ratio was 80.2 percent, which compared reasonably to the state average of 80.9 percent and the national peer average of 77.3 percent. OPB's loan-to-deposit ratio also compares reasonably to four similar institutions within the assessment area that have an average ratio of 74.2 percent.

Lending in Assessment Areas

A substantial majority of OPB's small business and home mortgage loans were originated within the bank's assessment areas as shown in Exhibit 2 below.

EXHIBIT 2 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS								
Loan Type	Inside				Outside			
	#	%	\$ ('000s)	%	#	%	\$ ('000s)	%
Small Business	45	88.2	9,835	74.0	6	11.8	3,450	26.0
Total Business Related	45	88.2	9,835	74.0	6	11.8	3,450	26.0
Home Purchase	71	95.9	10,343	92.6	3	4.1	831	7.4
Home Improvement	23	95.8	1,194	94.1	1	4.2	75	5.9
Home Refinance	65	95.6	14,476	95.7	3	4.4	650	4.3
Multifamily	7	87.5	4,250	95.8	1	12.5	185	4.2
Total Mortgage Related	166	95.4	30,263	94.6	8	4.6	1,741	5.4
Total Loans	211	93.8	40,098	88.5	14	6.2	5,191	11.5

Geographic and Borrower Distribution

Overall, the bank's geographic distribution of lending reflects reasonable penetration throughout geographies of different income levels in the bank's assessment areas. Loans were generally located in the areas where the bank's branch offices are located and there were no conspicuous gaps in lending patterns.

The borrower distribution is excellent. Small business loans demonstrated excellent penetration among businesses of different revenue sizes and a majority of loans were made in smaller dollar amounts. Home mortgage loans included in the analysis were also reasonably distributed to borrowers of different income levels.

These overall conclusions are based on a variety of performance context issues that affect the individual conclusions in the separate assessment areas. Therefore, individual conclusions for the different assessments areas vary, and the facts and data supporting those assessments are presented within the separate assessment area analyses.

Response to Complaints

OPB did not receive any CRA-related complaints during the review period. Accordingly, the bank's performance in responding to complaints was not considered in evaluating its overall CRA performance.

Fair Lending or Other Illegal Practices Review

Concurrent with this CRA evaluation, a review of OPB's compliance with applicable consumer protection laws and regulation was conducted. The review found no evidence of violation of the substantive provisions of anti-discrimination, fair lending, or credit practices rules, laws or regulations.

FULL-SCOPE ASSESSMENT AREA CONCLUSIONS

For each assessment area where a full-scope review was performed using the examination procedures.

Florence Assessment Area

DESCRIPTION OF OPERATIONS IN FLORENCE

The Florence assessment area includes nine census tracts, located primarily in the western portions of Lane County. Among these nine census tracts are two census tracts located in the northwestern portion of Douglas County and one census tract located in southwestern portion of Lincoln County. This assessment area is home to the city of Florence, which lies fifty one miles west of the major metropolitan center of Eugene. Much of the assessment area lies within the Siuslaw National Forest. As of July 2017, the three counties were home to approximately 500,000 people.¹

As of June 30, 2017, 16 Federal Deposit Insurance Corporation-insured commercial institutions operated 133 offices within this assessment area. OPB maintains a limited market share and ranked 12th among the 16 institutions with total deposits of \$195.4 million, representing 2.3 percent of the market.²

Exhibit 3 on the following page, presents key demographic and business information used to help develop a performance context for the assessment area.

¹ U.S. Census Bureau, 2017 Population Estimates, Douglas, Lane and Lincoln Counties; available from: <http://quickfacts.census.gov/qfd/index.html>.

² Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2017; available from: <https://www5.fdic.gov/sod/sodMarketRpt.asp?barItem=2>.

EXHIBIT 3 ASSESSMENT AREA DEMOGRAPHICS FLORENCE 2017 2010 U.S. CENSUS AND 2017 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,806	25.6
Moderate-income	3	33.3	2,506	35.6	349	13.9	1,591	22.6
Middle-income	6	66.7	4,539	64.4	545	12.0	1,463	20.8
Upper-income	0	0.0	0	0.0	0	0.0	2,185	31.0
Tract not reported	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	7,045	100.0	894	12.7	7,045	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract Income						
		Owner-Occupied			Renter-occupied		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,257	2,466	31.4	46.9	1,719	32.7	1,072	20.4
Middle-income	10,151	5,383	68.6	53.0	2,122	20.9	2,646	26.1
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Tract not reported	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	15,408	7,849	100.0	50.9	3,841	24.9	3,718	24.1
Income Categories	Total Businesses by Tract		Businesses by Tract Income & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	462	35.0	434	34.7	18	36.0	10	50.0
Middle-income	859	65.0	817	65.3	32	64.0	10	50.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Tract not reported	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,321	100.0	1,251	100.0	50	100.0	20	100.0
Percentage of Total Businesses			94.7		3.8		1.5	
2017 Median Family Income ³					2017 Median Home Price ⁴			
Douglas County			\$54,939		Douglas County		\$180,000	
Lane County			\$58,954		Lane County		\$256,925	
Lincoln County			\$53,682		Lincoln County		\$243,000	
2017 HUD Adjusted Median Family Income ⁵					2017 Unemployment Rate ⁶			
Douglas County			\$54,900		Douglas County		5.4%	
Lane County			\$59,000		Lane County		4.5%	
Lincoln County			\$53,700		Lincoln County		4.7%	

³ U.S. Department of Housing and Urban Development, Median Family Income; available from: <http://www.huduser.org/portal/datasets/il/il13/index.html>.

⁴ Trulia Real Estate, Oregon Home Prices, Median Sales Price; available from: www.trulia.com/blog/data-portal/data/.

⁵ U.S. Department of Housing and Urban Development, Adjusted Median Family Income; available from: <http://www.huduser.org/portal/datasets/il/il13/index.html>.

⁶ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <http://data.bls.gov/cgi-bin/dsrv?la>.

Economic Conditions

Douglas County's economy experienced economic growth during the review period and is mainly driven by education and health services, trade and transportation and manufacturing. With a federal veterans hospital in the county and a vital local government health care district in coastal Reedsport,⁷ education and health care provide for the largest source of employment and accounted for nearly 23 percent of the county's payroll employment in 2017.⁸ Trade, transportation, and utilities also make strong contributions to the county's economy and accounted for nearly 18 percent of employment.⁹ While manufacturing and construction were hard hit by the Great Recession and experienced substantial losses, the industry continued to regain lost ground and remains as the county's third largest industry in terms of employment.¹⁰

Similar to Douglas County, Lane County's economy also experienced economic growth and is largely driven by education and healthcare. PeaceHealth and the University of Oregon are the top two employers in the county, employing more than 10,000 employees.¹¹ Home to several educational institutions, multiple utility companies, and a federal courthouse, government employment continued to add stability to the county's economy. Another important industry that contributed to the county's economic growth was high-technology. Expansion of tech firms due to the low cost of doing business and a well-educated workforce allowed for huge population gains and robust income growth.¹²

As depicted in Exhibit 4 on the following page, a review of small business loan data reported by banks subject to the CRA shows that lending to small businesses improved during the review period consistent with the favorable economic trends. Nevertheless, levels remained well below pre-Great Recession levels for much of the review period suggesting that small businesses, which represent 94.7 percent of all businesses in the assessment area (see Exhibit 3), may face challenges in accessing credit.

⁷ State of Oregon Employment Department, Douglas County and Recent Business Trends, July 20, 2018; available from: www.qualityinfo.org/-/douglas-county-and-recent-business-trends.

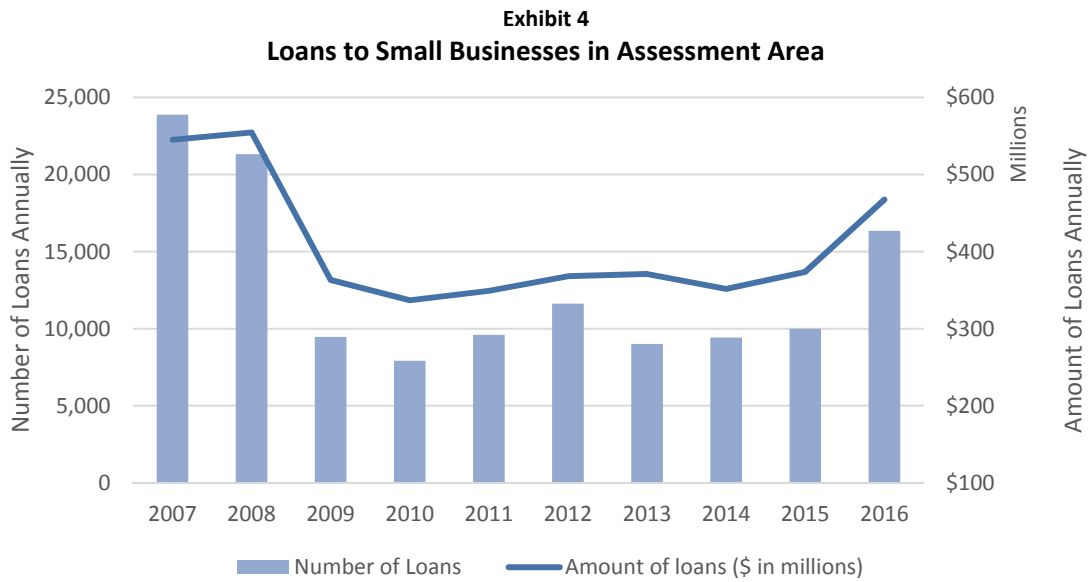
⁸ Ibid.

⁹ Ibid.

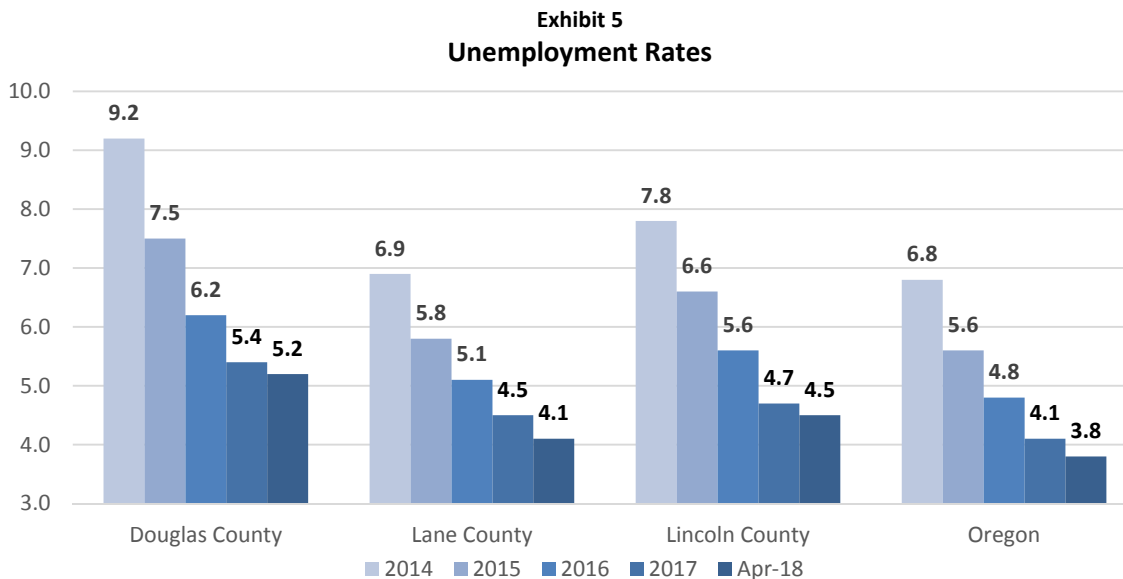
¹⁰ Ibid.

¹¹ Lane County Oregon, FY 17-18 Proposed Budget; available from: lanecounty.org/userfiles/servers/server_3585797/file/budget/fy%2017-18%proposed/overview.pdf.

¹² Moody's Precis Report, Eugene, August 2017.



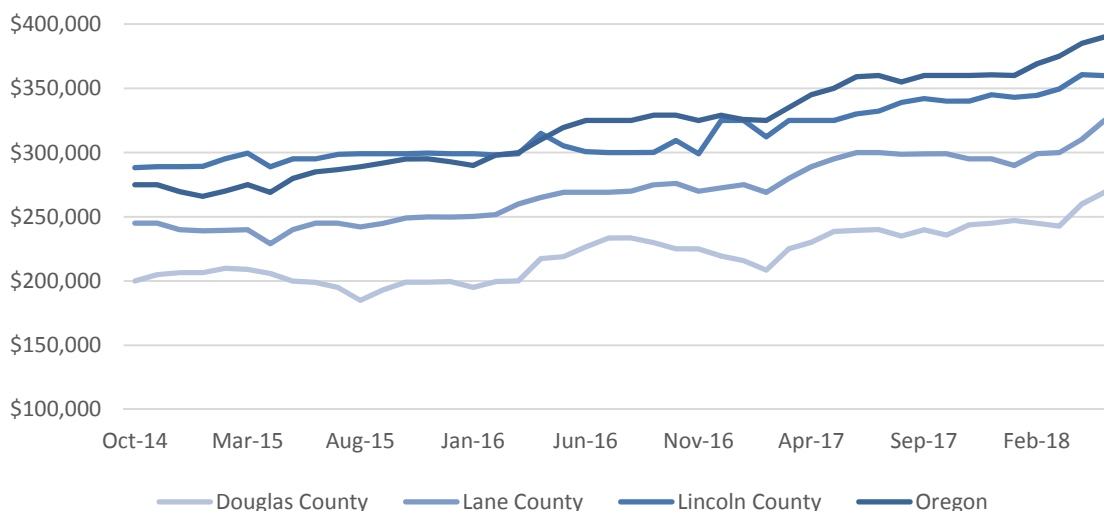
As depicted in Exhibit 5 below, the unemployment rates in all three counties in the assessment area decreased significantly during the review period, consistent with a recovering economy. However, all three counties have unemployment rates that are higher than the statewide average. In 2017, the annual unemployment rate was 4.1 percent in the state of Oregon.¹³



¹³ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County, available from <https://data.bls.gov/PDQWeb/la>.

As depicted in Exhibit 6 below, the prices of homes in the assessment area continually increased during the review period. As of December 2017, the median home price was \$245,000 in Douglas County, \$295,000 in Lane County, and \$345,000 in Lincoln County.¹⁴ Rising housing costs have decreased housing affordability and Douglas County and Lincoln County rank among the 10 percent least affordable rural counties in the country.¹⁵ Housing affordability is a challenge for renters as well. According to the National Low Income Housing Coalition, for every 100 renter households who need affordable housing, there are 25 affordable and available units at or below the extremely low income threshold in Oregon.¹⁶ In addition, 87 percent of extremely low-income renter households are cost-burdened meaning these households spend more than 30 percent of their income on housing costs and utilities.¹⁷

**Exhibit 6
 Median Home Prices**



Finally, as shown in Exhibit 7 on the following page, the poverty rate and food stamp usage rate for all three counties remain higher than the statewide average. Despite the recovering economy and low unemployment, all three counties continue to lag behind the rest of the state and struggle with high poverty and food stamp/SNAP enrollment.

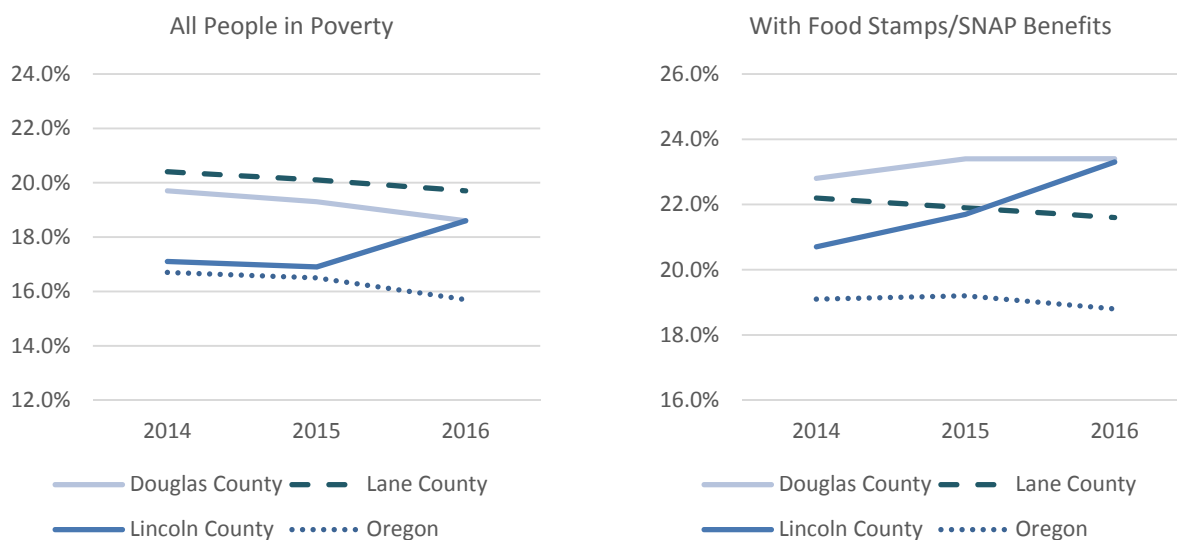
¹⁴ Trulia, Data Central, Median Listing Prices by Geography; available from: www.trulia.com/blog/data-portal/data.

¹⁵ Oregon Office of Economic Analysis, Rural Housing Affordability; available from: <https://oregoneconomicanalysis.com/2017/02/09/rural-housing-affordability>.

¹⁶ National Low Income Housing Coalition, Gap Report: Oregon; available from: <http://nlihc.org/gap/2016/or>.

¹⁷ Ibid.

**Exhibit 7
Poverty and Food Stamp Usage Rates**



Credit and Community Development Needs

The CRA small business lending levels previously discussed, surveys and community contacts suggest that small businesses in the assessment area face challenges in accessing credit and that some level of small business credit needs remain unmet by area banks. According to the 2017 Small Business Credit Survey (SBCS), 70 percent of smaller firms (annual revenues of \$100K or less) experienced financing shortfalls and obtained less than the amount of financing sought, more often than larger firms.¹⁸ The vast majority of businesses applied for a business loan or line of credit¹⁹ and in amounts less than \$100K for purposes of business expansion or to pursue a new opportunity.²⁰ Information from community contacts suggested similar trends within the assessment area.

Rising prices in homes and rents as well as declining affordability also suggest the need for affordable housing development and financing within the assessment area. As mentioned previously, many residents in the assessment area are cost-burdened by increasing costs of housing and lack of affordable housing. According to information obtained by community contacts in the area, there are many barriers to housing affordability, such as difficulty in constructing, rehabilitating and preserving property, and a need for affordable housing financing and mortgage lending.

The high levels of poverty and food stamp usage rates in the assessment area highlight the importance of community service organizations working to help address the needs of this vulnerable population within the bank’s communities. The ongoing demands on these organizations suggest that there may be opportunities for banks to support the wide range of community needs ranging from technical assistance for small businesses to housing assistance and financial education programs for first-time homebuyers.

¹⁸ 2017 Small Business Credit Survey, Report on Employer Firms, available from: <https://fedsmallbusiness.org/medialibrary/fedsmallbusiness/files/2018/sbcs-employer-firms-report.pdf>.

¹⁹ Ibid.

²⁰ Ibid.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN FLORENCE

Overall, OPB’s lending in the Florence assessment area is excellent. Stronger geographic and borrower distribution performance was noted in the bank’s small business lending when compared to home mortgage lending. However, the geographic and borrower distributions for home purchase and home refinance lending are reasonable.

Lending Distribution by Geography

The geographic distribution of lending in the Florence assessment area is excellent. Loans were distributed throughout the assessment area with no conspicuous gaps, and were generally concentrated in the communities near the bank’s office. The lack of lending in low-income census tracts is due to the absence of such tracts in the assessment area.

Small Business Lending

The geographic distribution of lending to small businesses is excellent. As shown in Exhibit 8 below, the bank’s level of lending compares favorably to aggregate lending and the concentration of businesses in moderate-income census tracts.

EXHIBIT 8 GEOGRAPHIC DISTRIBUTION OF SMALL BUSINESS LOANS								
Census Tract	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
FLORENCE Assessment Area 2017								
Bank Lending	0	0.0	5	62.5	3	37.5	0	0.0
Aggregate Lending	0	0.0	94	33.0	191	67.0	0	0.0
Business Concentration	0	0.0	462	35.0	859	65.0	0	0.0

Home Purchase Lending

The geographic distribution of home purchase loans is reasonable. Home purchase loans were reasonably distributed in moderate-income census tracts. As shown in Exhibit 9 on the following page, these lending patterns were generally consistent with aggregate lending and the percentage of owner-occupied housing in each census tract category.

EXHIBIT 9 GEOGRAPHIC DISTRIBUTION OF HOME PURCHASE LOANS								
Census Tract	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
FLORENCE Assessment Area 2014								
Bank Lending	0	0.0	3	30.0	7	70.0	0	0.0
Aggregate Lending	0	0.0	102	33.3	204	66.7	0	0.0
Owner Occupied Housing	0	0.0	2,906	35.4	5,308	64.6	0	0.0
FLORENCE Assessment Area 2015								
Bank Lending	0	0.0	9	50.0	9	50.0	0	0.0
Aggregate Lending	0	0.0	170	40.7	248	59.3	0	0.0
Owner Occupied Housing	0	0.0	2,906	35.4	5,308	64.6	0	0.0
FLORENCE Assessment Area 2016								
Bank Lending	0	0.0	3	27.3	8	72.7	0	0.0
Aggregate Lending	0	0.0	148	33.9	289	66.1	0	0.0
Owner Occupied Housing	0	0.0	2,906	35.4	5,308	64.6	0	0.0
FLORENCE Assessment Area 2017								
Bank Lending	0	0.0	4	36.4	7	63.6	0	0.0
Aggregate Lending	0	0.0	175	35.3	321	64.7	0	0.0
Owner Occupied Housing	0	0.0	2,466	31.4	5,383	68.6	0	0.0

Home Refinance Lending

The geographic distribution of home refinance lending was also reasonable. As shown in Exhibit 10 on the following page, the bank’s overall performance was generally consistent with aggregate lending and the levels of owner-occupied housing in the assessment area. While year-over-year performance was inconsistent, this performance can be explained through relatively low volumes of lending that can easily skew the analysis.

EXHIBIT 10 GEOGRAPHIC DISTRIBUTION OF HOME REFINANCE LOANS								
Census Tract	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
FLORENCE Assessment Area 2014								
Bank Lending	0	0.0	0	0.0	2	100.0	0	0.0
Aggregate Lending	0	0.0	81	41.1	116	58.9	0	0.0
Owner Occupied Housing	0	0.0	2,906	35.4	5,308	64.6	0	0.0
FLORENCE Assessment Area 2015								
Bank Lending	0	0.0	7	53.8	6	46.2	0	0.0
Aggregate Lending	0	0.0	106	37.7	175	62.3	0	0.0
Owner Occupied Housing	0	0.0	2,906	35.4	5,308	64.6	0	0.0
FLORENCE Assessment Area 2016								
Bank Lending	0	0.0	5	35.7	9	64.3	0	0.0
Aggregate Lending	0	0.0	144	40.8	209	59.2	0	0.0
Owner Occupied Housing	0	0.0	2,906	35.4	5,308	64.6	0	0.0
FLORENCE Assessment Area 2017								
Bank Lending	0	0.0	1	12.5	7	87.5	0	0.0
Aggregate Lending	0	0.0	79	29.2	192	70.8	0	0.0
Owner Occupied Housing	0	0.0	2,466	31.4	5,383	68.6	0	0.0

Lending Distribution by Borrower Income and Business Revenue

The borrower distribution of lending within the Florence assessment area is excellent. Similar to the geographic distribution, the bank's small business lending performance was stronger than the bank's home purchase and refinance lending. Nevertheless, the borrower distribution for the bank's home purchase and home refinance lending is reasonable.

Small Business Lending

The distribution of loans among businesses of different sizes is excellent. As shown in Exhibit 11 below, the bank provided a significant percentage of its small business loans to businesses with revenues of less than \$1 million. In addition, a substantial majority of the loans were originated in smaller dollar amounts, thereby helping address an articulated credit need in the community.

EXHIBIT 11 BUSINESS REVENUE DISTRIBUTION OF SMALL BUSINESS LOANS							
Year	Bank Lending #	Lending to Businesses with Revenue <=\$1 Million			Originations Regardless of Revenue Size by Loan Amount		
		Bank Lending (%)	Businesses <=\$1M in Revenue (%)	Aggregate Lending (%)	<=\$100K (%)	> \$100K & <=\$250K (%)	>250K & <=\$1M (%)
2017	8	75.0	94.7	58.9	62.5	25.0	12.5

Home Purchase Lending

The distribution of home purchase loans to borrowers of different income levels is reasonable. While lending varied across the review period as shown in Exhibit 12, overall performance in lending to moderate-income borrowers compared reasonably to the aggregate. OPB’s overall lending also outperformed the market in lending to low-income borrowers. This performance can be tied to the bank’s offering of non-conventional loans (e.g., Federal Housing Administration loans) and loans to purchase and refinance manufactured housing.

EXHIBIT 12 BORROWER DISTRIBUTION OF HOME PURCHASE LOANS								
Borrower Income	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
FLORENCE Assessment Area 2014								
Bank Lending	0	0.0	3	33.3	2	22.2	4	44.4
Aggregate Lending	16	5.8	54	19.6	78	28.4	127	46.2
Families	1,583	22.9	1,777	25.7	1,427	20.7	2,115	30.6
FLORENCE Assessment Area 2015								
Bank Lending	3	17.6	0	0.0	4	23.5	10	58.8
Aggregate Lending	15	4.1	70	19.0	116	31.4	168	45.5
Families	1,583	22.9	1,777	25.7	1,427	20.7	2,115	30.6
FLORENCE Assessment Area 2016								
Bank Lending	3	27.3	2	18.2	1	9.1	5	45.5
Aggregate Lending	29	7.2	92	22.9	91	22.6	190	47.3
Families	1,583	22.9	1,777	25.7	1,427	20.7	2,115	30.6
FLORENCE Assessment Area 2017								
Bank Lending	2	18.2	4	36.4	1	9.1	4	36.4
Aggregate Lending	21	4.6	80	17.5	121	26.5	234	51.3
Families	1,806	25.6	1,591	22.6	1,463	20.8	2,185	31.0

Home Refinance Lending

The borrower distribution of home refinance loans is reasonable. With the exception of performance in reaching low-income borrowers in 2014, OPB' performance in reaching low- and moderate-income borrowers was generally consistent with or exceeded the performance of aggregate lenders as can be seen in Exhibit 13 below. The gap in performance for low-income borrowers in 2014 can be attributed to limited loan volumes during this reporting year.

EXHIBIT 13 BORROWER DISTRIBUTION OF HOME REFINANCE LOANS								
Borrower Income	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
FLORENCE Assessment Area 2014								
Bank Lending	0	0.0	1	50.0	1	50.0	0	0.0
Aggregate Lending	11	6.8	40	24.7	39	24.1	72	44.4
Families	1,583	22.9	1,777	25.7	1,427	20.7	2,115	30.6
FLORENCE Assessment Area 2015								
Bank Lending	1	8.3	2	16.7	3	25.0	6	50.0
Aggregate Lending	11	5.3	34	16.3	48	23.0	116	55.5
Families	1,583	22.9	1,777	25.7	1,427	20.7	2,115	30.6
FLORENCE Assessment Area 2016								
Bank Lending	1	8.3	2	16.7	2	16.7	7	58.3
Aggregate Lending	14	5.6	40	16.0	67	26.8	129	51.6
Families	1,583	22.9	1,777	25.7	1,427	20.7	2,115	30.6
FLORENCE Assessment Area 2017								
Bank Lending	2	33.3	2	33.3	0	0.0	2	33.3
Aggregate Lending	21	9.5	47	21.2	61	27.5	93	41.9
Families	1,806	25.6	1,591	22.6	1,463	20.8	2,185	31.0

Eugene Assessment Area

DESCRIPTION OF OPERATIONS IN EUGENE

The Eugene assessment area includes eighty census tracts in the eastern portions of Lane County and is home to the major metropolitan center of Eugene. OPB's operations in this assessment area are limited to a single professional banking office which caters to a niche market and provides select professional banking services. As of July 2017, Lane County had a population of 374,748 making it the fourth-most populous county in the state.²¹

The majority of OPB's banking activity is conducted within Lane County, which is a competitive marketplace for financial services. As of June 30, 2017, OPB held \$165.8 million in deposits, representing 3.1 percent of the market share and ranking the bank 10th out of 14 Federal Deposit Insurance Corporation-insured financial institutions operating within Lane County.²²

Exhibit 14 on the following page, presents key demographic and business information used to help develop a performance context for the assessment area.

²¹ U.S. Census Bureau, 2017 Population Estimates, Lane County; available from: <http://quickfacts.census.gov/qfd/index.html>.

²² Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2017; available from: <https://www5.fdic.gov/sod/sodMarketRpt.asp?barItem=2>.

EXHIBIT 14 ASSESSMENT AREA DEMOGRAPHICS EUGENE 2017 2010 U.S. CENSUS AND 2017 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.8	1,268	1.6	455	35.9	17,205	21.1
Moderate-income	16	20.0	15,371	18.8	3,117	20.3	14,306	17.5
Middle-income	41	51.3	45,507	55.7	4,975	10.9	16,703	20.5
Upper-income	20	25.0	19,492	23.9	1,041	5.3	33,424	40.9
Tract not reported	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	80	100.0	81,638	100.0	9,588	11.7	81,638	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract Income						
		Owner-Occupied		Renter-occupied		Vacant		
		#	%	%	#	%	#	%
Low-income	7,244	729	0.9	10.1	5,775	79.7	740	10.2
Moderate-income	29,322	12,716	15.8	43.4	14,866	50.7	1,740	5.9
Middle-income	79,120	45,366	56.5	57.3	29,056	36.7	4,698	5.9
Upper-income	31,346	21,440	26.7	68.4	8,101	25.8	1,805	5.8
Tract not reported	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	147,032	80,251	100.0	54.6	57,798	39.3	8,983	6.1
Income Categories	Total Businesses by Tract	Businesses by Tract Income & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	967	5.8	847	5.5	113	9.1	7	6.4
Moderate-income	3,843	23.0	3,388	22.0	439	35.3	16	14.5
Middle-income	7,862	47.0	7,364	47.9	444	35.7	54	49.1
Upper-income	4,048	24.2	3,767	24.5	248	19.9	33	30.0
Tract not reported	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	16,720	100.0	15,366	100.0	1,244	100.0	110	100.0
Percentage of Total Businesses			91.9		7.4		0.7	
2017 Median Family Income ²³					2017 Median Home Price ²⁴			
Lane County			\$58,954		Lane County		\$256,925	
2017 HUD Adjusted Median Family Income ²⁵					2017 Unemployment Rate ²⁶			
Lane County			\$59,000		Lane County		4.5%	

²³ U.S. Department of Housing and Urban Development, Median Family Income; available from: <http://www.huduser.org/portal/datasets/il/il13/index.html>.

²⁴ Trulia Real Estate, Oregon Home Prices, Median Sales Price; available from: www.trulia.com/blog/data-portal/data/

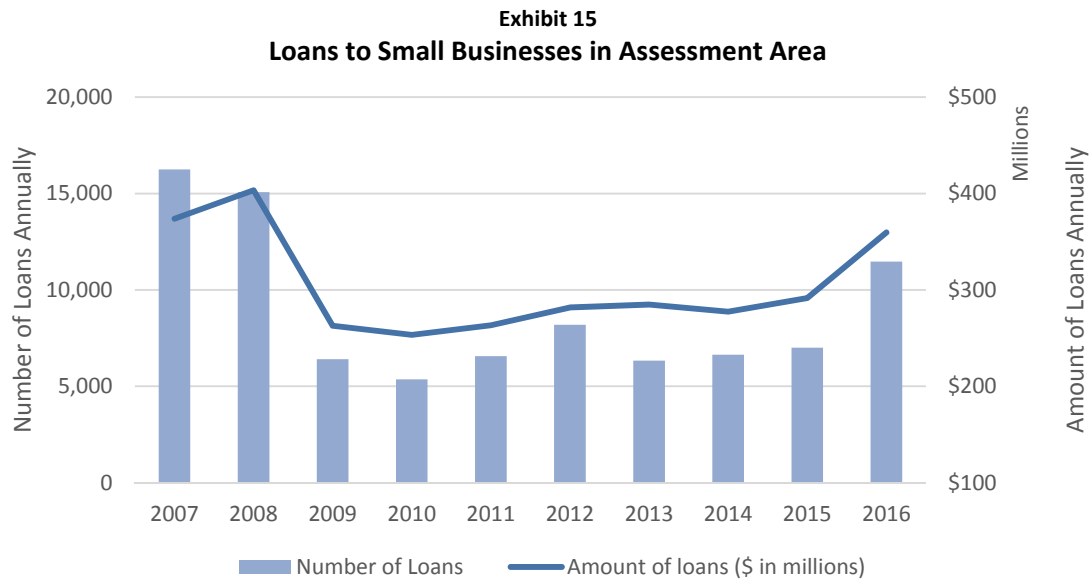
²⁵ U.S. Department of Housing and Urban Development, Adjusted Median Family Income; available from: <http://www.huduser.org/portal/datasets/il/il13/index.html>.

²⁶ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <http://data.bls.gov/cgi-bin/dsrv?la>.

Economic Conditions

As mentioned previously, Lane County’s economy experienced economic growth during the review period. Economic growth was largely influenced by the strong education and healthcare sector as well as the growing technology sector. Universities and research institutes in the area supported innovation and provided stability and a pool of highly skilled workers for the area. Job opportunities in high wage industries, especially professional/business services, as well as a lower cost of doing business, encouraged workers and firms to move to the area.²⁷

Similar to the Florence assessment area small business lending levels improved during the review period consistent with the improving economy, but remained depressed relative to pre-Great Recession levels over the review period. These levels suggest that small businesses, which represent the vast majority of all businesses in the assessment area as depicted in Exhibit 15, face challenges in accessing credit.

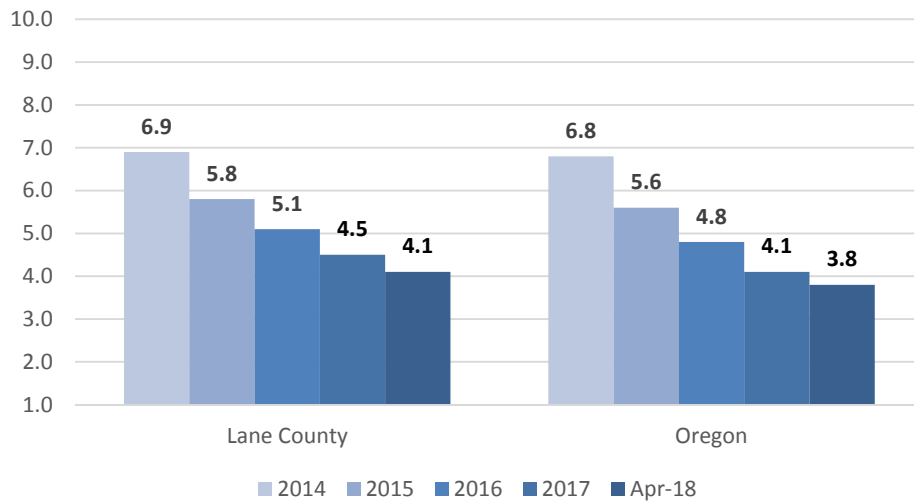


As depicted in Exhibit 16 on the following page, Lane County’s unemployment rate decreased significantly during the review period, indicating an improving economy. At the end of 2017, the annual unemployment rate was 4.5 percent in Lane County and 4.1 percent in Oregon.²⁸

²⁷ Moody’s Precis Report, Eugene April 2017.

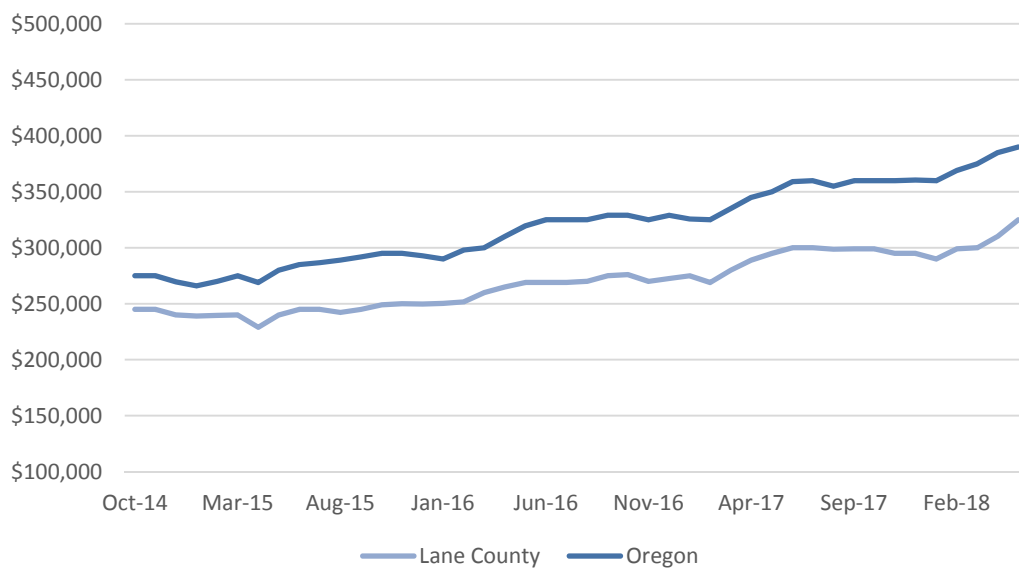
²⁸ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County, available from <https://data.bls.gov/PDQWeb/la>.

Exhibit 16
Unemployment Rates



As depicted in Exhibit 17 below, the prices of homes in Lane County increased during the review period. In May 2018, the median home value in Lane County was \$325,000 compared to \$390,000 in Oregon.²⁹ Overall, rising home prices in the entire state have made housing less affordable and accessible to households, especially those of low-income. According to the National Low Income Housing Coalition, there is a deficit of 135,693 affordable and available rental units in the state at or below 50% area median income (AMI).³⁰

Exhibit 17
Median Home Prices

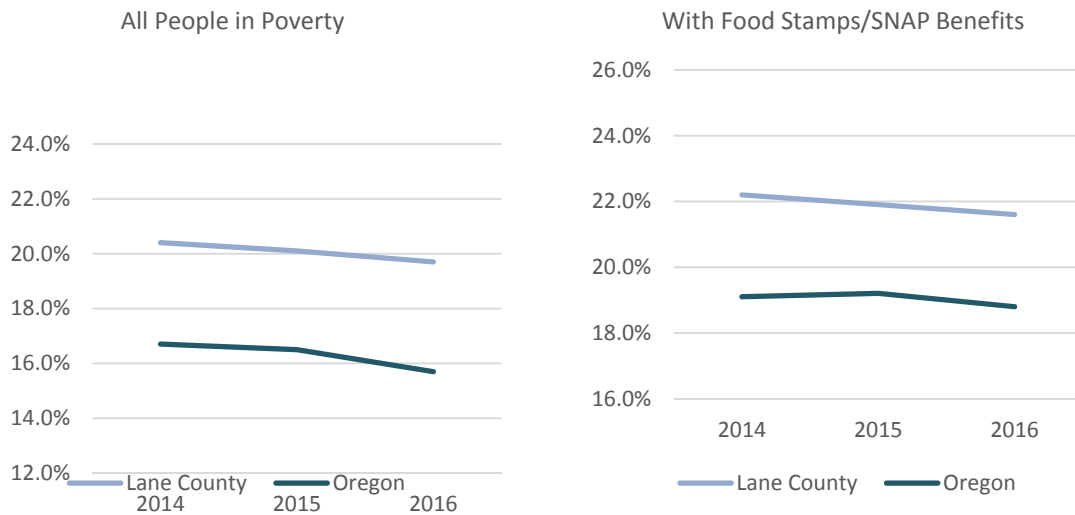


²⁹ Trulia, Data Central, Median Listing Prices by Geography; available from: www.trulia.com/blog/data-portal/data.

³⁰ National Low Income Housing Coalition, Gap Report: Oregon; available from: <http://nlihc.org/gap/2016/or>.

As depicted in Exhibit 18 below, the poverty rate and food stamp usage rate decreased in Lane County during the review period. However, both rates remain higher in Lane County than the statewide average. In addition, Lane County has a liquid asset poverty rate of 38.1 percent, which is higher than the nationwide rate of 36.8 percent.³¹ Liquid asset poverty measures the percentage of households without sufficient liquid assets to subsist at the poverty level for three months in the absence of income.

**Exhibit 18
 Poverty and Food Stamp Usage Rates**



Credit and Community Development Needs

Similar to the Florence assessment area, small businesses in Eugene face challenges in accessing credit and some level of small business credit needs remain unmet by local financial institutions. According to the 2016 SBCS 12th District Report, 66 percent of firms in the state of Oregon sought financing that amounted to less than \$100,000,³² highlighting the need for microloans in the area. In addition to financing for small business owners, there is a strong need for affordable housing financing as articulated by community contacts. Finally, there is an opportunity for banks to support the wide range of community development needs in the area by engaging in community development activities and/or partnering with organizations that address the aforementioned needs of those that are most vulnerable in the community.

³¹ Prosperity Now Scorecard, Local Outcome Report, Lane County, OR; available from: scorecard.prosperitynow.org/data-by-location#county/41039.

³² Federal Reserve Bank of San Francisco, Small Business Credit Survey, 12th District Report, 2016; available from: www.frbsf.org/community-development/data/2016-small-business-credit-survey-12th-district-report/files/small-business-credit-survey-12th-district-report.pdf.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN EUGENE

OPB's lending in the Eugene assessment area is reasonable. Loans were reasonably distributed throughout the assessment area with no conspicuous gaps in lending. In addition, OPB distribution of lending to businesses of different revenue sizes is excellent.

Distribution by Geography

Small Business Lending

The geographic distribution of small business loans is reasonable. As shown in Exhibit 19 below, the bank's performance in moderate-income census tracts was consistent with the performance of aggregate lenders. While no loans were originated in low-income census geographies, this is reasonable given the bank recently expanded into this assessment area during the review period with the opening of its branch in Eugene.

EXHIBIT 19 GEOGRAPHIC DISTRIBUTION OF SMALL BUSINESS LOANS								
Census Tract	Low		Moderate		Middle		Upper	
	#	%	#	%	#	%	#	%
EUGENE Assessment Area 2017								
Bank Lending	0	0.0	5	25.0	7	35.0	8	40.0
Aggregate Lending	368	6.3	1,369	23.5	2,680	46.0	1,407	24.2
Business Concentration	967	5.8	3,843	23.0	7,862	47.0	4,048	24.2

Lending Distribution by Business Revenue

Small Business Lending

The distribution of loans among businesses of different sizes is excellent. As shown in Exhibit 20 below, OPB originated a significant majority of its loans to businesses with gross annual revenues of less than \$1 million, exceeding the performance of aggregate lenders operating within the assessment area. In addition, a majority of loans were originated in amounts less than \$250,000, thereby meeting an articulated credit need.

EXHIBIT 20 BUSINESS REVENUE DISTRIBUTION OF SMALL BUSINESS LOANS							
Year	Bank Lending #	Lending to Businesses with Revenue <=\$1 Million			Originations Regardless of Revenue Size by Loan Amount		
		Bank Lending (%)	Businesses <=\$1M in Revenue (%)	Aggregate Lending (%)	<=\$100K (%)	> \$100K & <=\$250K (%)	>250K & <=\$1M (%)
2017	20	75.0	91.9	52.3	35.0	30.0	35.0

LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS

For each assessment area where a limited-scope review was performed using the examination procedures.

OPB's performance in the assessment areas receiving limited-scope reviews is generally consistent with the performance in the areas receiving full-scope reviews. Due to the bank's more limited presence in these markets and lower percentages of loans and deposits, the limited scope assessment areas received less weight than the full-scope assessment areas. Consequently, performance in these areas did not materially affect the bank's overall lending assessment. Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report.

EXHIBIT 21 LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS	
ASSESSMENT AREAS	LENDING TEST
Coos Bay	Consistent
Roseburg	Consistent

APPENDIX A

GLOSSARY OF TERMS

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.

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

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

Full-scope review: Performance under the lending and community development tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, responsiveness).

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance under the lending and community development tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

Rated area: A rated area is a state or 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.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

APPENDIX B

LIMITED-SCOPE ASSESSMENT AREA MARKET PROFILES

Coos Bay Assessment Area

The Coos Bay assessment area lies along the Oregon coast south of Florence and encompasses all of Coos County, which is composed of thirteen census tracts. As of 2017, Coos County housed a population of 63,888 people.³³ Although OPB maintains a full-service branch in Coos Bay which provides banking services to this region, overall loan volume is low.

In this assessment area, OPB operates one branch located in the city of Coos Bay. As of June 30, 2017, the bank's office held \$19.1 million deposits, representing 2.1 percent of the market share and ranking 7th out of seven FDIC-insured financial institutions operating in Coos County.³⁴

The following exhibits present key demographic and business information used to develop a performance context for the assessment area.

³³U.S. Census Bureau, 2017 Population Estimates, Coos County; available from:
<https://www.census.gov/quickfacts/fact/table/cooscountyoregon,US#viewtop>.

³⁴ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2017; available from:
<https://www5.fdic.gov/sod/sodMarketRpt.asp?barItem=2>.

EXHIBIT 22 ASSESSMENT AREA DEMOGRAPHICS COOS BAY ASSESSMENT AREA 2010 CENSUS AND 2017 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,153	20.1
Moderate-income	1	7.7	630	4.0	129	20.5	3,283	21.0
Middle-income	11	84.6	14,462	92.3	1,630	11.3	3,595	22.9
Upper-income	1	7.7	576	3.7	70	12.2	5,637	36.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	15,668	100.0	1,829	11.7	15,668	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,266	777	4.6	61.4	290	22.9	199	15.7
Middle-income	27,950	15,337	91.1	54.9	8,389	30.0	4,224	15.1
Upper-income	1,266	717	4.3	56.6	378	29.9	171	13.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	30,482	16,831	100.0	55.2	9,057	29.7	4,594	15.1
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	109	3.8	104	3.9	4	2.3	1	3.2
Middle-income	2,614	91.1	2,428	91.2	157	89.7	29	93.5
Upper-income	145	5.1	130	4.9	14	8.0	1	3.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,868	100.0	2,662	100.0	175	100.0	31	100.0
% of Total Businesses				92.8		6.1		1.1
2017 Median Family Income ³⁵			\$50,354	December 2017 Median Housing Value ³⁶			\$249,000	
2017 HUD Adjusted Median Family Income ³⁷			\$50,400	2017 Unemployment Rate ³⁸			5.2%	

³⁵ U.S. Census Bureau, American Community Survey 1 Yr Estimates, 2017; available from: <http://factfinder2.census.gov>.

³⁶ Trulia Real Estate, Oregon Home Prices, Median Sales Price; available from: www.trulia.com/blog/data-portal/data/.

³⁷ U.S. Department of Housing and Urban Development, Adjusted Median Family Income; available from: <http://www.huduser.org/portal/datasets/il/il13/index.html>.

³⁸ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <http://data.bls.gov/cgi-bin/dsrv?la>.

EXHIBIT 23 BUSINESS REVENUE DISTRIBUTION OF SMALL BUSINESS LOANS							
Year	Bank Lending #	Lending to Businesses with Revenue <=\$1 Million			Originations Regardless of Revenue Size by Loan Amount		
		Bank Lending (%)	Businesses <=\$1M in Revenue (%)	Aggregate Lending (%)	<=\$100K (%)	> \$100K & <=\$250K (%)	>250K & <=\$1M (%)
2017	5	60.0	92.8	55.6	40.0	60.0	0.0

EXHIBIT 24 GEOGRAPHIC DISTRIBUTION OF SMALL BUSINESS LOANS									
Census Tract	Low		Moderate		Middle		Upper		
	#	%	#	%	#	%	#	%	
Coos Bay Assessment Area 2017									
Bank Lending	0	0.0	0	0.0	5	100.0	0	0.0	
Aggregate Lending	0	0.0	34	4.1	766	91.8	34	4.1	
Business Concentration	0	0.0	109	3.8	2,614	91.1	145	5.1	

Roseburg Assessment Area

The Roseburg assessment area lies south of Eugene and is composed of nineteen census tracts, all located within Douglas County. Much of this assessment area lies within the Umpqua National Forest.

In this assessment area, OPB operates one branch located in the city of Roseburg, which is the largest city within the assessment area. As of June 30, 2017, the bank's office in Roseburg held \$29.7 million deposits, representing 1.2 percent of the market share and ranking 7th out of seven FDIC-insured financial institutions operating in the city of Roseburg.³⁹

The following exhibits present key demographic and business information used to help develop a performance context for the assessment area.

³⁹ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2017; available from; <https://www5.fdic.gov/sod/sodMarketRpt.asp?barItem=2>.

EXHIBIT 25 ASSESSMENT AREA DEMOGRAPHICS ROSEBURG ASSESSMENT AREA 2010 CENSUS AND 2017 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,914	22.1
Moderate-income	2	10.5	2,935	11.0	711	24.2	4,944	18.5
Middle-income	16	84.2	21,641	80.9	2,944	13.6	5,238	19.6
Upper-income	1	5.3	2,170	8.1	64	2.9	10,650	39.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19	100.0	26,746	100.0	3,719	13.9	26,746	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,108	2,821	10.5	55.2	1,648	32.3	639	12.5
Middle-income	35,595	22,027	81.8	61.9	10,279	28.9	3,289	9.2
Upper-income	3,723	2,064	7.7	55.4	1,211	32.5	448	12.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	44,426	26,912	100.0	60.6	13,138	29.6	4,376	9.9
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	404	8.6	382	8.8	18	6.3	4	7.5
Middle-income	3,769	80.3	3,489	80.1	232	81.7	48	90.6
Upper-income	519	11.1	484	11.1	34	12.0	1	1.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,692	100.0	4,355	100.0	284	100.0	53	100.0
% of Total Businesses				92.8		6.1		1.1
2017 Median Family Income ⁴⁰			\$54,939	December 2017 Median Housing Value ⁴¹			\$180,000	
2017 HUD Adjusted Median Family Income ⁴²			\$54,900	2017 Unemployment Rate ⁴³			5.4%	

⁴⁰ U.S. Census Bureau, American Community Survey 1 Yr Estimates, 2017; available from: <http://factfinder2.census.gov>.

⁴¹ Trulia Real Estate, Oregon Home Prices, Median Sales Price; available from: www.trulia.com/blog/data-portal/data/.

⁴² U.S. Department of Housing and Urban Development, Adjusted Median Family Income; available from: <http://www.huduser.org/portal/datasets/il/il13/index.html>.

⁴³ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <http://data.bls.gov/cgi-bin/dsrv?la>.

EXHIBIT 26 BUSINESS REVENUE DISTRIBUTION OF SMALL BUSINESS LOANS							
Year	Bank Lending #	Lending to Businesses with Revenue <=\$1 Million			Originations Regardless of Revenue Size by Loan Amount		
		Bank Lending (%)	Businesses <=\$1M in Revenue (%)	Aggregate Lending (%)	<=\$100K (%)	> \$100K & <=\$250K (%)	>250K & <=\$1M (%)
2017	12	50.0	92.8	52.6	16.7	33.3	50.0

EXHIBIT 27 GEOGRAPHIC DISTRIBUTION OF SMALL BUSINESS LOANS									
Census Tract	Low		Moderate		Middle		Upper		
	#	%	#	%	#	%	#	%	
ROSEBURG Assessment Area 2017									
Bank Lending	0	0.0	3	25.0	9	75.0	0	0.0	
Aggregate Lending	0	0.0	133	9.7	1,087	79.5	148	10.8	
Business Concentration	0	0.0	404	8.6	3,769	80.3	519	11.1	



COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board (Board) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the Federal Reserve Bank of San Francisco; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from the Officer in Charge of Supervision, Federal Reserve Bank of San Francisco, 101 Market Street, San Francisco, California 94105. You may send written comments about our performance in helping to meet community credit needs to Catherine Green, Compliance & CRA Officer, Oregon Pacific Bank, 1365 Highway 101, Florence, Oregon 97439 and to the Officer in Charge of Supervision, Federal Reserve Bank of San Francisco, 101 Market Street, San Francisco, California 94105. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank.



Branch Offices and ATM's

OPB Branch Locations	Date Established	Hours of Operation	County, Census Tract and MSA of Branch Location
Florence Branch	December 1979	Lobby Hours	Lane County
1355 Highway 101		9am – 5pm M-Th	Census Tract
Florence Oregon 97439		9am – 6pm Fr	00007.05
		Drive-up Hours	MSA 21660
		8:30am – 5pm M-Th	
		8:30am – 6pm Fr	
Coos Bay Branch	June 2002	Lobby Hours	Coos County
915 South First St		10am – 5pm M-Fr	Census Tract
Coos Bay, Oregon 97420		Drive-up Hours	0007.01
		8:30am - 5pm M-Fr	
Roseburg Branch	January 2002	Lobby Hours	Douglas County
2555 NW Edenbower		10am – 5pm M-Fr	Census Tract
Roseburg, Oregon 97471		Drive-up Hours	800.02
		8:30am – 5pm M-Fr	
Eugene Branch	July 2016	Lobby Hours	Lane County
59 E 11 th Ave		9:00am – 5pm M-Fr	Census Tract
Eugene, Oregon 97401		Drive-up Hours	39.00
		8:30am – 5pm M-Fr	MSA 21660
Medford Branch	March 2020	Lobby Hours	Jackson County
3250 Hillcrest Park Dr., Suite 100		9am – 5pm M-Fr	Census Tract
Medford, Oregon 97504			6.03
			MSA 32780
Portland Metro Branch	November 2023	Lobby Hours	Washington County
16101 SW 72 nd Ave Suite 140		10am – 5pm M-Fr	Census Tract
Tigard, Oregon 97224			0320.05
			MSA 38900
ATM Locations			
Florence Main*	1996	24 hours	Lane County
Drive-up			
Coos Bay Branch*	December 2003	24 hours	Coos County
Drive-up			
Roseburg Branch*	January 2004	24 hours	Douglas County
Drive-up			
Eugene Branch*	January 2019	24 hours	Lane County
Drive-up			

* ATM address same as branch

**Oregon Pacific Bank customers also have access to the MoneyPass® ATM Network, a surcharge-free ATM network, which allows our customers to transact at thousands of additional ATMs across the country.



Community Reinvestment Act
 Assessment Area – Census Tracts –
 County Served

OPB Branch	Census Tract Served	Tract Income Level	County Served
Florence Branch	0005.00	Moderate	Lane
	0007.02	Middle	Lane
	0007.05	Moderate	Lane
	0007.06	Middle	Lane
	0007.07	Middle	Lane
	0007.08	Middle	Lane
	0100.00	Middle	Douglas
	0200.00	Middle	Douglas
Roseburg Branch	0300.00	Middle	Douglas
	0400.00	Middle	Douglas
	0500.01	Middle	Douglas
	0500.03	Middle	Douglas
	0500.04	Middle	Douglas
	0600.00	Upper	Douglas
	0700.00	Middle	Douglas
	0800.01	Middle	Douglas
	0800.02	Middle	Douglas
	0900.01	Middle	Douglas
	0900.02	Upper	Douglas
	1000.00	Middle	Douglas
	1100.00	Middle	Douglas
	1200.01	Middle	Douglas
	1200.02	Moderate	Douglas
	1300.01	Moderate	Douglas
	1300.02	Middle	Douglas
	1400.00	Middle	Douglas
	1500.01	Middle	Douglas
	1500.02	Middle	Douglas
1600.01	Middle	Douglas	
1600.02	Moderate	Douglas	
1700.00	Middle	Douglas	
1800.00	Middle	Douglas	
1900.00	Middle	Douglas	
2000.00	Moderate	Douglas	
2100.00	Moderate	Douglas	
Coos Bay Branch	0001.01	Middle	Coos
	0001.02	Middle	Coos
	0001.03	Upper	Coos
	0002.00	Upper	Coos
	0003.00	Middle	Coos
	0004.01	Upper	Coos
	0004.02	Upper	Coos
	0005.02	Middle	Coos
	0005.03	Middle	Coos
	0005.05	Middle	Coos
	0005.06	Moderate	Coos
	0006.00	Upper	Coos
	0007.01	Middle	Coos
0007.02	Middle	Coos	
0008.00	Upper	Coos	
0009.01	Middle	Coos	

	0009.02	Moderate	Coos
	0010.01	Middle	Coos
	0010.02	Moderate	Coos
	0011.01	Moderate	Coos
	0011.02	Middle	Coos
Medford Branch	1.00	Low	Jackson
	2.01	Moderate	Jackson
	2.02	Moderate	Jackson
	2.03	Moderate	Jackson
	3.00	Moderate	Jackson
	4.03	Upper	Jackson
	4.04	Middle	Jackson
	4.05	Middle	Jackson
	4.06	Middle	Jackson
	5.01	Middle	Jackson
	5.02	Moderate	Jackson
	6.03	Upper	Jackson
	6.04	Middle	Jackson
	6.05	Middle	Jackson
	6.06	Upper	Jackson
	7.01	Middle	Jackson
	7.02	Middle	Jackson
	8.00	Middle	Jackson
	9.01	Upper	Jackson
	9.02	Middle	Jackson
	10.01	Middle	Jackson
	10.02	Middle	Jackson
	11.00	Middle	Jackson
	12.00	Moderate	Jackson
	13.01	Middle	Jackson
	13.03	Moderate	Jackson
	13.04	Upper	Jackson
	14.01	Middle	Jackson
	14.02	Upper	Jackson
	14.03	Middle	Jackson
	15.00	Upper	Jackson
	16.01	Moderate	Jackson
	16.02	Middle	Jackson
	17.01	Middle	Jackson
	17.02	Middle	Jackson
	18.01	Middle	Jackson
	18.02	Middle	Jackson
	19.00	Middle	Jackson
	20.00	Upper	Jackson
	21.00	Upper	Jackson
	22.00	Upper	Jackson
	23.00	Middle	Jackson
	24.00	Middle	Jackson
	25.00	Upper	Jackson
	26.00	Middle	Jackson
	27.01	Middle	Jackson
	27.02	Moderate	Jackson
	28.00	Middle	Jackson
	29.01	Moderate	Jackson
	29.02	Middle	Jackson
	30.01	Middle	Jackson
	30.02	Upper	Jackson
Eugene Branch	1.00	Middle	Lane
	2.00	Upper	Lane
	3.00	Middle	Lane
	4.02	Upper	Lane

	4.03	Middle	Lane
	4.04	Middle	Lane
	8.00	Upper	Lane
	9.02	Middle	Lane
	9.03	Moderate	Lane
	9.04	Middle	Lane
	10.01	Middle	Lane
	10.02	Middle	Lane
	11.01	Middle	Lane
	11.02	Middle	Lane
	12.01	Middle	Lane
	12.02	Moderate	Lane
	13.01	Moderate	Lane
	13.02	Middle	Lane
	14.00	Middle	Lane
	15.00	Moderate	Lane
	16.00	Middle	Lane
	17.00	Upper	Lane
	18.01	Middle	Lane
	18.03	Middle	Lane
	18.04	Upper	Lane
	19.02	Moderate	Lane
	19.03	Middle	Lane
	19.04	Middle	Lane
	20.01	Upper	Lane
	20.02	Middle	Lane
	21.01	Middle	Lane
	21.03	Moderate	Lane
	21.04	Moderate	Lane
	22.01	Upper	Lane
	22.03	Upper	Lane
	22.04	Upper	Lane
	23.01	Middle	Lane
	23.02	Middle	Lane
	24.01	Upper	Lane
	24.03	Middle	Lane
	24.04	Middle	Lane
	25.01	Middle	Lane
	25.04	Moderate	Lane
	25.05	Middle	Lane
	25.06	Upper	Lane
	26.00	Moderate	Lane
	27.00	Middle	Lane
	28.00	Middle	Lane
	29.02	Middle	Lane
	29.03	Upper	Lane
	29.04	Upper	Lane
	30.00	Middle	Lane
	31.01	Upper	Lane
	31.03	Upper	Lane
	31.04	Moderate	Lane
	32.01	Moderate	Lane
	32.02	Middle	Lane
	33.01	Moderate	Lane
	33.02	Moderate	Lane
	34.00	Moderate	Lane
	35.00	Middle	Lane
Eugene Office (Continued)	36.00	Upper	Lane
	37.00	Middle	Lane
	38.01	Unknown	Lane
	38.02	Upper	Lane

	39.00	Moderate	Lane
	40.00	Moderate	Lane
	41.00	Middle	Lane
	42.00	Moderate	Lane
	43.00	Middle	Lane
	44.03	Moderate	Lane
	44.04	Middle	Lane
	44.05	Upper	Lane
	44.06	Middle	Lane
	44.07	Moderate	Lane
	45.01	Middle	Lane
	45.02	Unknown	Lane
	46.00	Middle	Lane
	47.00	Upper	Lane
	48.00	Moderate	Lane
	49.00	Upper	Lane
	50.00	Upper	Lane
	51.00	Moderate	Lane
	52.00	Upper	Lane
	53.00	Upper	Lane
	54.00	Upper	Lane
Portland Metro Branch	0301.03	Middle	Washington
	0301.04	Upper	Washington
	0301.05	Middle	Washington
	0301.06	Upper	Washington
	0302.00	Upper	Washington
	0303.00	Upper	Washington
	0304.01	Middle	Washington
	0304.02	Upper	Washington
	0305.01	Middle	Washington
	0305.02	Upper	Washington
	0306.00	Middle	Washington
	0307.00	Moderate	Washington
	0308.01	Middle	Washington
	0308.03	Middle	Washington
	0308.05	Middle	Washington
	0308.06	Upper	Washington
	0309.00	Moderate	Washington
	0310.05	Moderate	Washington
	0310.07	Upper	Washington
	0310.08	Middle	Washington
	0310.09	Upper	Washington
	0310.10	Upper	Washington
	0310.11	Moderate	Washington
	0310.12	Middle	Washington
	0311.00	Moderate	Washington
	0312.01	Moderate	Washington
	0312.02	Moderate	Washington
	0313.01	Middle	Washington
	0313.02	Middle	Washington
	0314.02	Moderate	Washington
	0314.03	Middle	Washington
	0314.04	Middle	Washington
	0315.04	Middle	Washington
	0315.06	Middle	Washington
	0315.07	Upper	Washington
	0315.09	Upper	Washington
	0315.11	Upper	Washington
	0315.14	Upper	Washington
	0315.15	Upper	Washington
	0315.16	Upper	Washington

	0315.17	Middle	Washington
	0315.18	Upper	Washington
	0315.19	Upper	Washington
Portland Metro (Continued)	0315.20	Upper	Washington
	0316.06	Moderate	Washington
	0316.12	Moderate	Washington
	0316.14	Middle	Washington
	0316.15	Moderate	Washington
	0316.16	Middle	Washington
	0316.17	Moderate	Washington
	0316.18	Middle	Washington
	0316.19	Middle	Washington
	0316.20	Middle	Washington
	0316.21	Upper	Washington
	0316.22	Middle	Washington
	0316.23	Middle	Washington
	0316.24	Middle	Washington
	0316.25	Middle	Washington
	0316.26	Moderate	Washington
	0317.03	Moderate	Washington
	0317.05	Moderate	Washington
	0317.06	Moderate	Washington
	0317.07	Middle	Washington
	0317.08	Moderate	Washington
	0318.04	Upper	Washington
	0318.06	Middle	Washington
	0318.07	Middle	Washington
	0318.13	Upper	Washington
	0318.14	Upper	Washington
	0318.16	Middle	Washington
	0318.17	Upper	Washington
	0318.18	Middle	Washington
	0318.19	Middle	Washington
	0318.20	Upper	Washington
	0318.21	Upper	Washington
	0319.04	Upper	Washington
	0319.09	Upper	Washington
	0319.11	Middle	Washington
	0319.12	Upper	Washington
	0319.13	Middle	Washington
	0319.14	Moderate	Washington
	0319.15	Upper	Washington
	0319.16	Upper	Washington
	0319.17	Upper	Washington
	0319.18	Upper	Washington
	0320.01	Middle	Washington
	0320.03	Moderate	Washington
	0320.04	Middle	Washington
	0320.05	Moderate	Washington
	0321.04	Upper	Washington
	0321.07	Upper	Washington
	0321.08	Upper	Washington
	0321.09	Upper	Washington
	0321.10	Middle	Washington
	0321.11	Upper	Washington
	0321.12	Middle	Washington
	0322.01	Upper	Washington
	0322.02	Upper	Washington
	0323.01	Middle	Washington
	0323.02	Middle	Washington
	0324.04	Middle	Washington

	0324.07	Middle	Washington
	0324.09	Low	Washington
	0324.10	Middle	Washington
	0324.11	Middle	Washington
	0324.12	Middle	Washington
	0324.13	Middle	Washington
	0324.14	Upper	Washington
	0325.01	Moderate	Washington
	0325.02	Middle	Washington
	0325.03	Middle	Washington
	0326.03	Middle	Washington
Portland Metro (Continued)	0326.04	Middle	Washington
	0326.06	Moderate	Washington
	0326.08	Upper	Washington
	0326.09	Upper	Washington
	0326.10	Middle	Washington
	0326.11	Upper	Washington
	0326.12	Upper	Washington
	0327.00	Upper	Washington
	0328.00	Upper	Washington
	0329.01	Middle	Washington
	0329.03	Moderate	Washington
	0329.04	Moderate	Washington
	0330.00	Middle	Washington
	0331.01	Middle	Washington
	0331.02	Middle	Washington
	0332.01	Moderate	Washington
	0332.02	Moderate	Washington
	0333.01	Middle	Washington
	0333.02	Upper	Washington
	0334.00	Middle	Washington
	0335.00	Middle	Washington
	0336.00	Middle	Washington
	0201.01	Upper	Clackamas
	0201.02	Upper	Clackamas
	0202.01	Upper	Clackamas
	0202.02	Upper	Clackamas
	0203.02	Upper	Clackamas
	0203.03	Upper	Clackamas
	0203.04	Upper	Clackamas
	0204.01	Upper	Clackamas
	0204.03	Upper	Clackamas
	0204.04	Upper	Clackamas
	0205.03	Upper	Clackamas
	0205.04	Upper	Clackamas
	0205.05	Upper	Clackamas
	0205.06	Upper	Clackamas
	0205.07	Upper	Clackamas
	0206.01	Upper	Clackamas
	0206.02	Upper	Clackamas
	0207.00	Upper	Clackamas
	0208.00	Moderate	Clackamas
	0209.00	Moderate	Clackamas
	0210.00	Middle	Clackamas
	0211.00	Middle	Clackamas
	0212.00	Middle	Clackamas
	0213.00	Moderate	Clackamas
	0214.00	Middle	Clackamas
	0215.00	Middle	Clackamas
	0216.01	Moderate	Clackamas
	0216.02	Moderate	Clackamas

	0217.00	Middle	Clackamas
	0218.01	Upper	Clackamas
	0218.02	Moderate	Clackamas
	0219.00	Moderate	Clackamas
	0220.00	Middle	Clackamas
	0221.01	Middle	Clackamas
	0221.05	Middle	Clackamas
	0221.07	Moderate	Clackamas
	0221.08	Middle	Clackamas
	0221.09	Middle	Clackamas
	0221.10	Middle	Clackamas
	0222.01	Low	Clackamas
	0222.05	Upper	Clackamas
	0222.06	Upper	Clackamas
	0222.07	Upper	Clackamas
	0222.08	Upper	Clackamas
	0223.01	Middle	Clackamas
	0223.02	Middle	Clackamas
	0224.00	Middle	Clackamas
Portland Metro (Continued)	0225.01	Middle	Clackamas
	0225.02	Middle	Clackamas
	0226.02	Middle	Clackamas
	0226.03	Middle	Clackamas
	0226.05	Middle	Clackamas
	0226.06	Middle	Clackamas
	0227.02	Upper	Clackamas
	0227.07	Upper	Clackamas
	0227.08	Upper	Clackamas
	0227.10	Middle	Clackamas
	0228.00	Middle	Clackamas
	0229.01	Middle	Clackamas
	0229.04	Moderate	Clackamas
	0229.05	Middle	Clackamas
	0229.06	Middle	Clackamas
	0229.07	Moderate	Clackamas
	0230.01	Middle	Clackamas
	0230.02	Middle	Clackamas
	0231.00	Middle	Clackamas
	0232.01	Upper	Clackamas
	0232.02	Middle	Clackamas
	0233.00	Middle	Clackamas
	0234.01	Middle	Clackamas
	0234.03	Middle	Clackamas
	0234.04	Middle	Clackamas
	0235.00	Middle	Clackamas
	0236.00	Middle	Clackamas
	0237.00	Middle	Clackamas
	0238.00	Middle	Clackamas
	0239.01	Middle	Clackamas
	0239.02	Moderate	Clackamas
	0240.00	Middle	Clackamas
	0241.00	Middle	Clackamas
	0242.00	Moderate	Clackamas
	0243.02	Middle	Clackamas
	0243.03	Moderate	Clackamas
	0243.04	Middle	Clackamas
	0244.01	Moderate	Clackamas
	0244.02	Middle	Clackamas
	0001.01	Upper	Multnomah
	0001.02	Upper	Multnomah
	0002.01	Upper	Multnomah

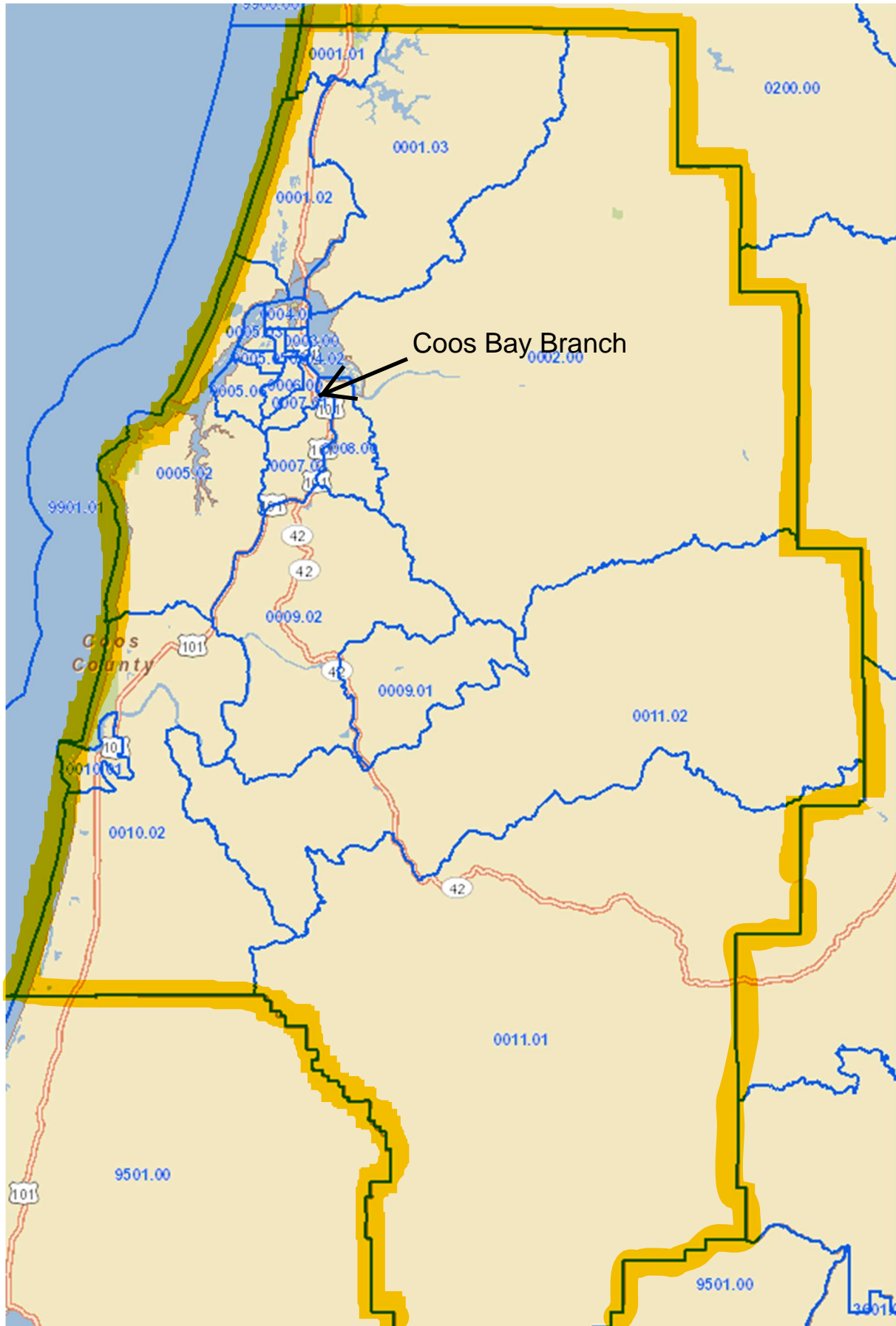
	0002.02	Middle	Multnomah
	0003.01	Middle	Multnomah
	0003.02	Upper	Multnomah
	0004.01	Middle	Multnomah
	0004.02	Middle	Multnomah
	0005.01	Middle	Multnomah
	0005.02	Middle	Multnomah
	0006.01	Moderate	Multnomah
	0006.02	Moderate	Multnomah
	0007.01	Middle	Multnomah
	0007.02	Middle	Multnomah
	0008.01	Upper	Multnomah
	0008.02	Middle	Multnomah
	0009.01	Upper	Multnomah
	0009.02	Middle	Multnomah
	0010.00	Middle	Multnomah
	0011.01	Middle	Multnomah
	0011.02	Upper	Multnomah
	0012.02	Upper	Multnomah
	0012.03	Middle	Multnomah
	0012.04	Moderate	Multnomah
	0013.01	Upper	Multnomah
	0013.02	Upper	Multnomah
	0014.00	Upper	Multnomah
	0015.00	Upper	Multnomah
	0016.01	Middle	Multnomah
	0016.02	Moderate	Multnomah
Portland Metro (Continued)	0017.02	Middle	Multnomah
	0017.03	Moderate	Multnomah
	0017.04	Middle	Multnomah
	0018.01	Upper	Multnomah
	0018.02	Middle	Multnomah
	0019.00	Upper	Multnomah
	0020.01	Moderate	Multnomah
	0020.02	Middle	Multnomah
	0021.01	Upper	Multnomah
	0021.02	Moderate	Multnomah
	0022.03	Middle	Multnomah
	0023.03	Middle	Multnomah
	0024.01	Upper	Multnomah
	0024.02	Upper	Multnomah
	0025.01	Upper	Multnomah
	0025.02	Middle	Multnomah
	0026.00	Upper	Multnomah
	0027.01	Upper	Multnomah
	0027.02	Middle	Multnomah
	0028.01	Upper	Multnomah
	0028.02	Upper	Multnomah
	0029.01	Middle	Multnomah
	0029.02	Middle	Multnomah
	0029.03	Middle	Multnomah
	0030.00	Upper	Multnomah
	0031.00	Upper	Multnomah
	0032.00	Upper	Multnomah
	0033.01	Moderate	Multnomah
	0033.02	Middle	Multnomah
	0034.01	Middle	Multnomah
	0034.02	Upper	Multnomah
	0035.01	Middle	Multnomah
	0035.02	Middle	Multnomah
	0036.01	Middle	Multnomah

	0036.02	Upper	Multnomah
	0036.03	Middle	Multnomah
	0037.01	Middle	Multnomah
	0037.02	Upper	Multnomah
	0038.01	Middle	Multnomah
	0038.02	Upper	Multnomah
	0038.03	Middle	Multnomah
	0039.02	Middle	Multnomah
	0039.03	Middle	Multnomah
	0039.04	Middle	Multnomah
	0040.02	Middle	Multnomah
	0040.03	Moderate	Multnomah
	0041.02	Middle	Multnomah
	0041.03	Middle	Multnomah
	0041.04	Low	Multnomah
	0042.00	Middle	Multnomah
	0043.00	Upper	Multnomah
	0045.00	Upper	Multnomah
	0046.01	Upper	Multnomah
	0046.02	Upper	Multnomah
	0047.00	Upper	Multnomah
	0048.00	Middle	Multnomah
	0049.01	Upper	Multnomah
	0049.02	Low	Multnomah
	0050.01	Upper	Multnomah
	0050.02	Upper	Multnomah
	0051.01	Upper	Multnomah
	0051.02	Upper	Multnomah
	0051.03	Middle	Multnomah
	0052.01	Upper	Multnomah
	0052.02	Middle	Multnomah
	0055.00	Middle	Multnomah
	0056.01	Middle	Multnomah
	0056.02	Moderate	Multnomah
	0057.01	Upper	Multnomah
Portland Metro (Continued)	0057.02	Middle	Multnomah
	0058.00	Upper	Multnomah
	0059.01	Upper	Multnomah
	0059.02	Upper	Multnomah
	0059.03	Upper	Multnomah
	0060.01	Upper	Multnomah
	0060.02	Upper	Multnomah
	0061.00	Upper	Multnomah
	0062.00	Upper	Multnomah
	0063.00	Upper	Multnomah
	0064.02	Upper	Multnomah
	0064.03	Middle	Multnomah
	0064.04	Upper	Multnomah
	0065.01	Upper	Multnomah
	0065.02	Upper	Multnomah
	0066.01	Upper	Multnomah
	0066.02	Middle	Multnomah
	0067.01	Upper	Multnomah
	0067.02	Middle	Multnomah
	0068.01	Upper	Multnomah
	0068.02	Upper	Multnomah
	0069.00	Upper	Multnomah
	0070.01	Upper	Multnomah
	0070.02	Upper	Multnomah
	0071.00	Middle	Multnomah
	0072.01	Middle	Multnomah

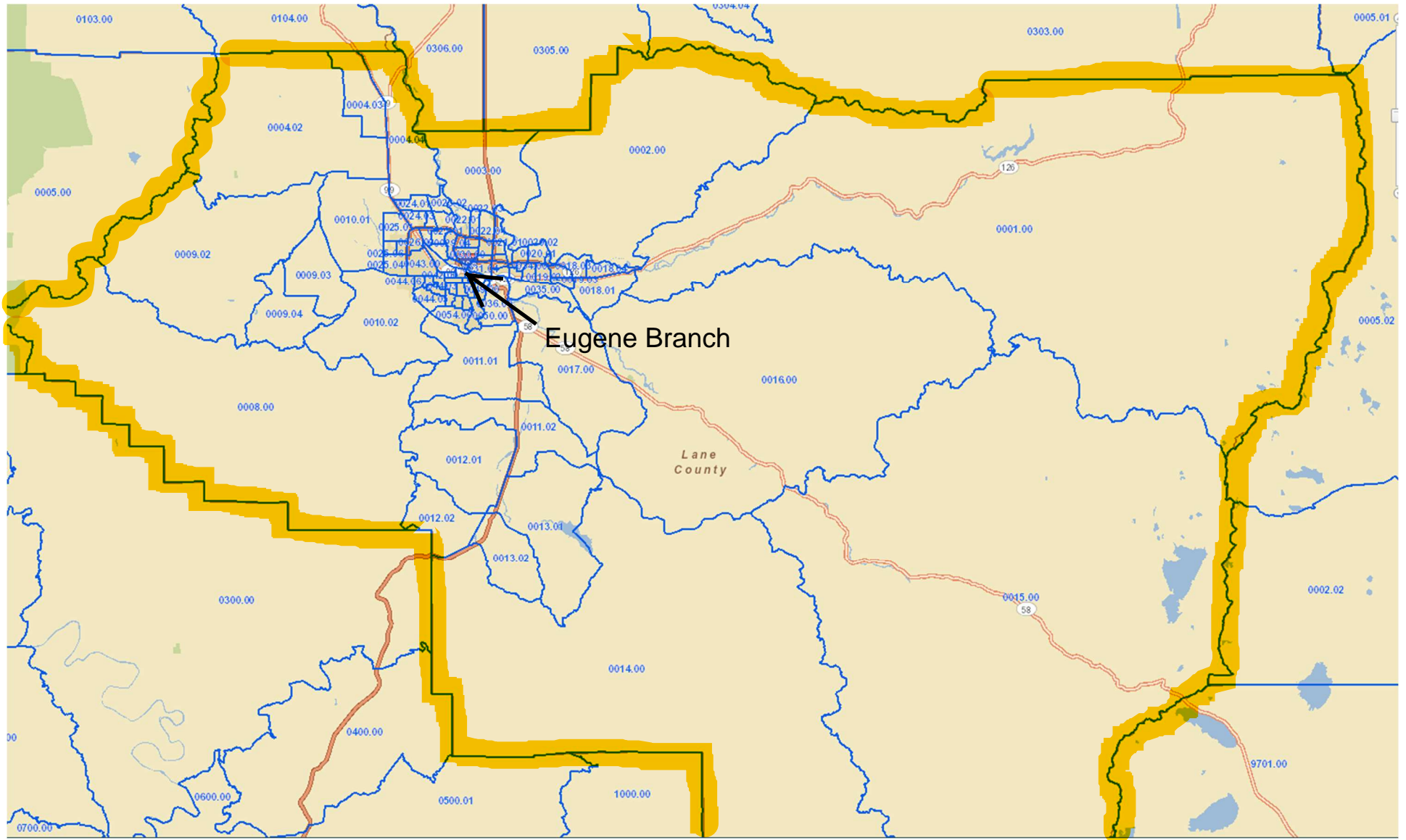
	0072.02	Middle	Multnomah
	0073.00	Middle	Multnomah
	0074.00	Moderate	Multnomah
	0075.00	Middle	Multnomah
	0076.00	Moderate	Multnomah
	0077.00	Moderate	Multnomah
	0078.00	Middle	Multnomah
	0079.00	Moderate	Multnomah
	0080.01	Moderate	Multnomah
	0080.02	Middle	Multnomah
	0081.00	Moderate	Multnomah
	0082.01	Middle	Multnomah
	0082.03	Moderate	Multnomah
	0082.04	Low	Multnomah
	0083.01	Moderate	Multnomah
	0083.02	Moderate	Multnomah
	0084.00	Moderate	Multnomah
	0085.00	Moderate	Multnomah
	0086.00	Moderate	Multnomah
	0087.00	Middle	Multnomah
	0088.00	Moderate	Multnomah
	0089.02	Middle	Multnomah
	0089.03	Middle	Multnomah
	0089.04	Moderate	Multnomah
	0090.01	Moderate	Multnomah
	0090.02	Low	Multnomah
	0091.01	Moderate	Multnomah
	0091.02	Middle	Multnomah
	0092.02	Moderate	Multnomah
	0092.03	Moderate	Multnomah
	0092.04	Moderate	Multnomah
	0093.01	Moderate	Multnomah
	0093.02	Moderate	Multnomah
	0094.00	Moderate	Multnomah
	0095.01	Moderate	Multnomah
	0095.02	Moderate	Multnomah
	0096.03	Moderate	Multnomah
	0096.04	Moderate	Multnomah
	0096.05	Moderate	Multnomah
	0096.06	Moderate	Multnomah
	0097.01	Moderate	Multnomah
	0097.03	Moderate	Multnomah
	0097.04	Low	Multnomah
Portland Metro (Continued)	0098.01	Low	Multnomah
	0098.03	Moderate	Multnomah
	0098.04	Moderate	Multnomah
	0099.03	Middle	Multnomah
	0099.04	Middle	Multnomah
	0099.05	Middle	Multnomah
	0099.06	Upper	Multnomah
	0099.07	Middle	Multnomah
	0100.01	Low	Multnomah
	0100.02	Middle	Multnomah
	0101.01	Moderate	Multnomah
	0101.02	Middle	Multnomah
	0102.00	Middle	Multnomah
	0103.03	Middle	Multnomah
	0103.04	Moderate	Multnomah
	0103.05	Middle	Multnomah
	0103.06	Middle	Multnomah
	0104.02	Middle	Multnomah

	0104.05	Moderate	Multnomah
	0104.07	Middle	Multnomah
	0104.08	Low	Multnomah
	0104.10	Low	Multnomah
	0104.11	Moderate	Multnomah
	0104.12	Middle	Multnomah
	0104.13	Middle	Multnomah
	0105.00	Middle	Multnomah
	0106.01	Unknown	Multnomah
	0106.02	Upper	Multnomah

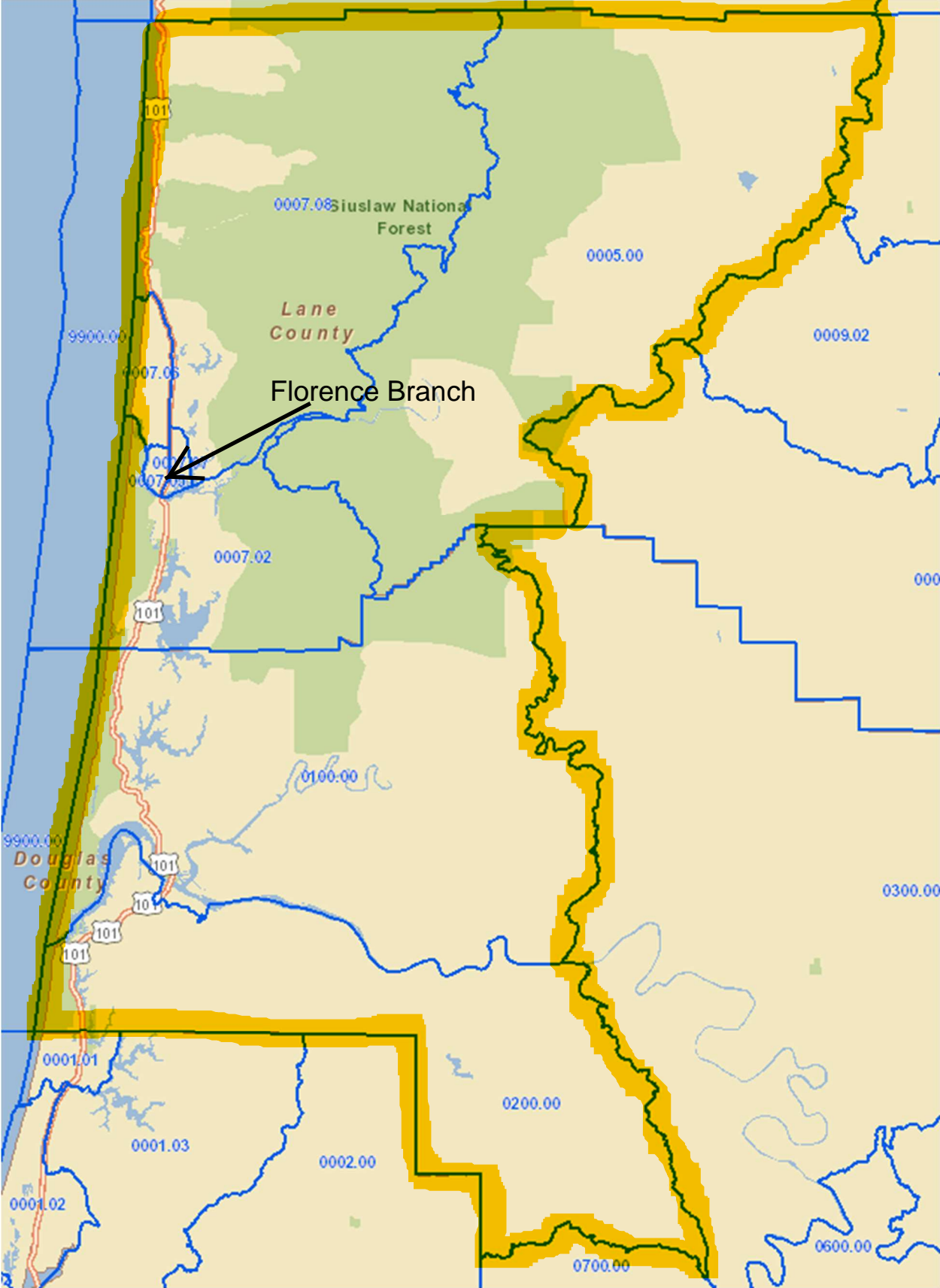
Coos Bay Branch Assessment Area



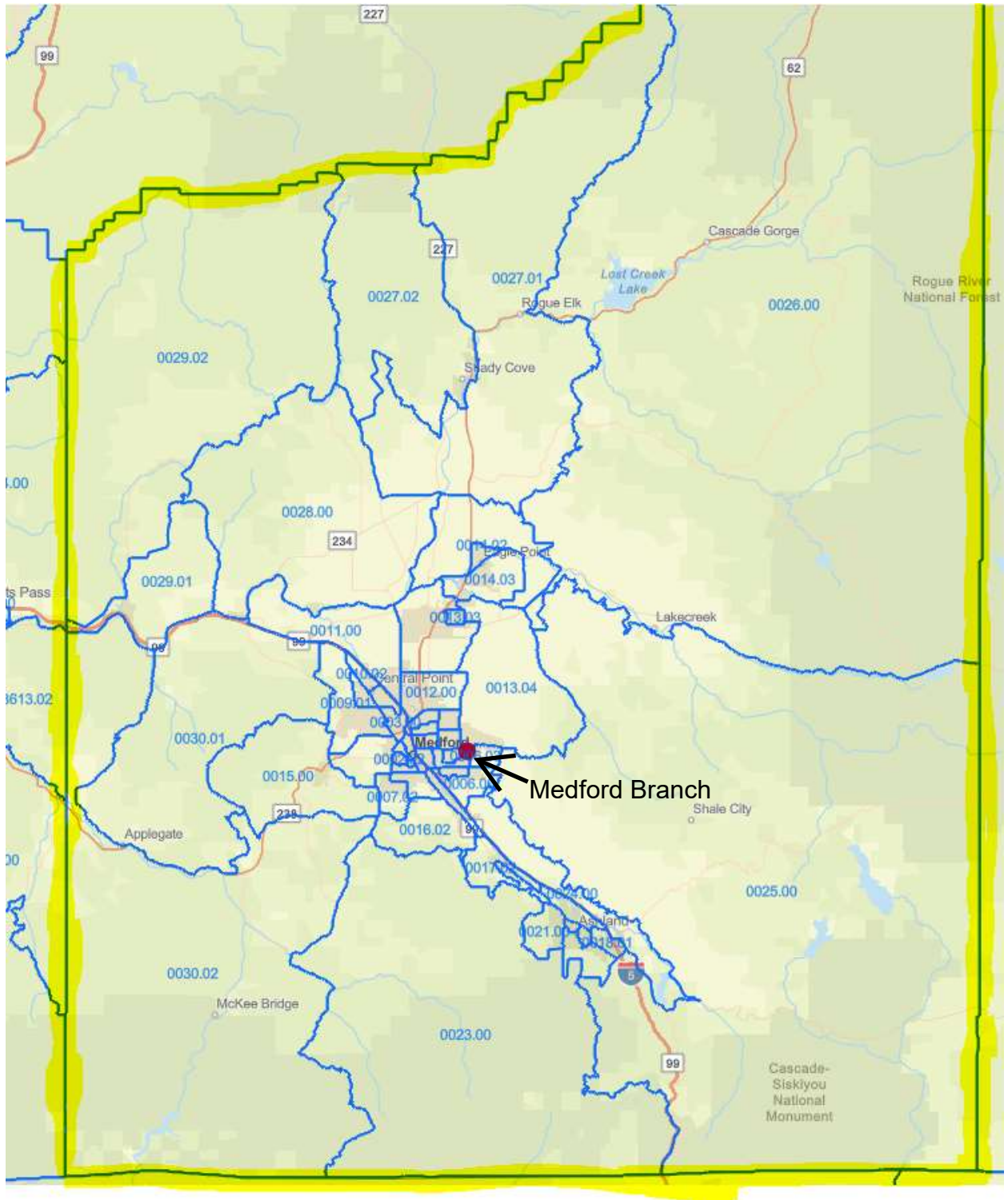
Eugene Branch Assessment Area



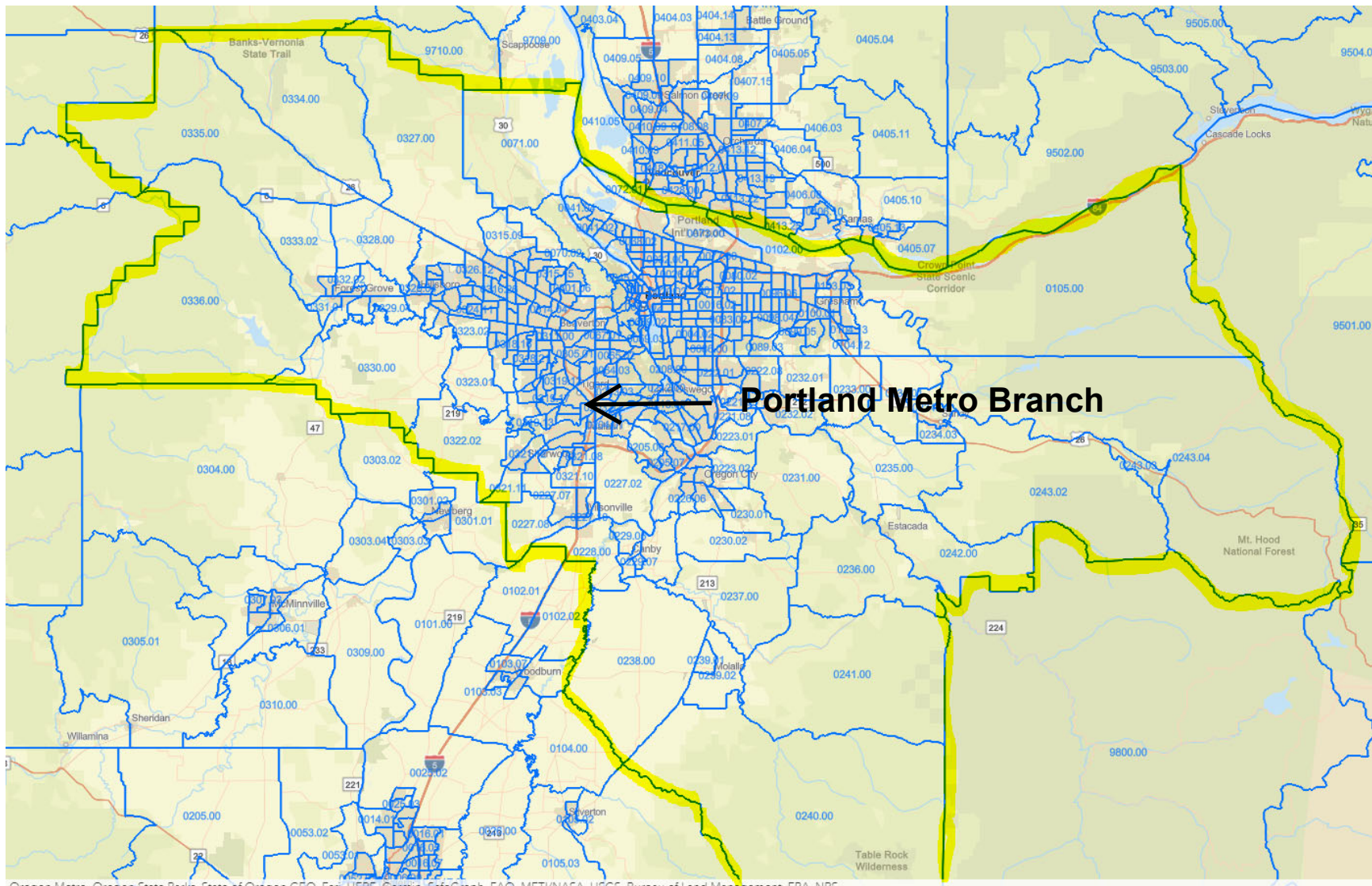
Florence Branch Assessment Area



Medford Branch Assessment Area



Portland Metro Branch Assessment Area





Banking Products and Services

Personal Banking

- Personal Checking and Money Market Accounts
- Savings, Certificates of Deposit, Individual Retirement Accounts (IRA's)
- Personal Loans and Lines of Credit, including:
 - New and Used Vehicles
 - Boats, Recreational Vehicles, ATVs and Motorcycles
 - Unsecured Installment Loans and Lines of Credit
 - Home Equity Loans and Lines of Credit
- Mortgage Loans
 - Conventional, VA, FHA, USDA
 - Lot Loans
 - Home Improvement Loans
 - Construction Loans
 - Manufactured Home Loans
 - Jumbo Loans (up to \$3 million)
- Online Banking, Bill Pay, Pay-A-Person (P2P), Mobile Banking and Mobile Deposit
- Telephone Banking
- Automated Teller Machine/Debit Card Services
- Automated Clearing House (ACH) Services
- Overdraft Protection
- Safe Deposit Box (Florence and Eugene branches only)
- Notary Services
- Signature Guarantee
- Foreign Currency Exchange
- Trust and Wealth Management Services
- Financial Advisory & Investment Management Services

Business Banking

- Business Checking and Money Market Accounts
- Business Savings and Certificates of Deposit
- Automated Sweep Accounts & Insured Cash Sweep Accounts
- Merchant Services
- Business Online Banking & Cash Management Services
 - Bill Pay
 - ACH Origination
 - Wire Transfers & Stop Payments
 - Remote Deposit Capture
 - Positive Pay
- Small Business Lending:
 - Commercial Real Estate Loans
 - Equipment Financing
 - Revolving Line of Credit
 - Term Loans
 - Construction Loans
- Government Guaranteed Loans
 - Business Oregon - Oregon Credit Enhancement Fund
 - Business Oregon - Oregon Business Development Fund
 - USDA – Business & Industry Guaranteed Loan Programs
 - Small Business Administration – 504/CDC Loan
 - Small Business Administration – 7(a) Loan Guarantee Program
- Non-Profit Solutions
- Trust and Wealth Management Services
- Financial Advisory and Investment Management Services
- Notary Services
- Signature Guarantee

Personal Checking and Savings Accounts

E-CHECKING	UNLIMITED CHECKING	BENEFITS INTEREST	PERSONAL SAVINGS	MONEY MARKET
Minimum Opening Balance: \$100	Minimum Opening Balance: \$100	Minimum Opening Balance: \$100	Minimum Opening Balance: \$100	Minimum Opening Balance: \$100
Monthly Service Charge: \$7 \$4.00 discount credit applied if enrolled in E-statements. Monthly service charge waived for primary account holders 18 years and under.	Monthly Service Charge: \$8 Service charge waived with \$1000 average daily balance.	Monthly Service Charge: \$12 Service charge waived with \$2500 average daily balance.	Monthly Service Charge: \$5 Service charge waived with \$500 average daily balance.	Monthly Service Charge: \$10 Service charge waived with \$1000 average daily balance.
Interest Earnings: n/a	Interest Earnings: n/a	Interest Earnings: Entire account balance.*	Interest Earnings: Entire account balance.*	Interest Earnings: Entire account balance.*
Checks Provided: n/a	Checks Provided: 1st standard box free.	Checks Provided: 1st standard box free.	Checks Provided: n/a	Checks Provided: 1st order of Money Market checks free.
Debit Card: First card issued free of charge. No ATM fees at Oregon Pacific Bank and MoneyPass ATMs.	Debit Card: First card issued free of charge. No ATM fees at Oregon Pacific Bank and MoneyPass ATMs.	Debit Card: First card issued free of charge. No ATM fees at Oregon Pacific Bank and MoneyPass ATMs.	ATM Card: First card issued free of charge. No ATM fees at Oregon Pacific Bank and MoneyPass ATMs.**	ATM or Debit Card: First card issued free of charge. No ATM fees at Oregon Pacific Bank and MoneyPass ATMs.
Misc: \$0.50 charge per check written. Includes checks written by you, issued through Bill Pay and Pre-authorized checks.	Misc: Unlimited check writing.	Misc: Unlimited check writing. 3 free cashier's checks per month.	Misc: Transaction limits apply. Monthly service charge waived for primary account holders 18 years and under.	Misc: Transaction limits apply. Unlimited teller & ATM withdrawals.

For all personal checking and savings accounts: No monthly service charge for Online and Mobile Banking, Bill Pay, or Mobile Deposit.

*See Relationship Banker for current interest rate schedule and additional details. **Transaction limits apply to ATM card usage. Deposit account products updated as of 8/1/2021



Business Checking and Savings Accounts

BUSINESS CHECKING	INTEREST BUSINESS	ANALYSIS BUSINESS	BUSINESS SAVINGS	MONEY MARKET
Minimum Opening Balance: \$100	Minimum Opening Balance: \$100	Minimum Opening Balance: \$100	Minimum Opening Balance: \$100	Minimum Opening Balance: \$100
Monthly Service Charge: No monthly service charge. No minimum daily balance.	Monthly Service Charge: \$10 Service charge waived with \$2500 minimum daily balance.	Monthly Service Charge: \$12 monthly maintenance fee plus analysis activity charges**	Monthly Service Charge: \$3 Service charge waived with \$200 minimum daily balance.	Monthly Service Charge: \$10 Service charge waived with \$1000 minimum daily balance or average monthly balance of \$2500.
Interest Earnings: n/a	Interest Earnings: Interest earned on account balances of \$10,000 or greater.*	Interest Earnings: Earnings credit available at competitive rate.*	Interest Earnings: Interest earned on entire account balance.*	Interest Earnings: Interest earned on entire account balance.*
Items per Month: 100 total debits, credits, and items deposited per month. \$0.20 per item over 100.	Items per Month: 300 total debits, credits, and items deposited per month. \$0.20 per item over 300.	Items per Month: No restrictions on items per month.	Items per Month: Transaction limits apply.	Items per Month: Transaction limits apply.
Statement Fee: \$5 monthly statement service charge. Waived if enrolled in e-statements.	Statement Fee: \$5 monthly statement service charge. Waived if enrolled in e-statements.	Statement Fee: n/a	Statement Fee: n/a	Statement Fee: n/a
Misc: No monthly service charge for Online Banking View and Transfer Services.	Misc: No monthly service charge for Online Banking View and Transfer Services.	Misc:** Monthly analysis statement details: Available balance, earnings credit summary, activity summary, costs, and balance requirements to support activity.	Misc: Limit of 6 teller withdrawals, ATM, or other pre-authorized transactions per month. Additional items \$1 each.	Misc: First order of Money Market checks free. Unlimited teller withdrawals. Limit of 6 pre-authorized transfers and checks per month. Additional items \$5 each.

For all business deposit accounts: First ATM or Debit card issued free of charge with No ATM fees at Oregon Pacific Bank and MoneyPass ATMs

**See Relationship Banker for current interest rate schedule and additional details. **See Relationship Banker for details on services, terms, and fee schedule. Deposit account products updated as of 8/1/2021*



PERSONAL ACCOUNTS

Fee Schedule

ATM/DEBIT CARD

Non-Oregon Pacific Bank ATM or Non-Money Pass ATM Transaction Fee	\$2.00
Replacement Card Fee	\$10.00
Overnight Card Order Rush Fee	\$120.00
International Fee	1.7%

CHECKS

Cashier's Checks	\$6.00
Counter Checks	\$.25 each
<i>First four free with confirmed check order</i>	

COIN/CURRENCY HANDLING

Coin Machine - Clients	Free
Coin Machine - Non-clients (\$500 max amt)	\$5.00 or 2% <i>(whichever is greater)</i>
Coin Rolls Purchased	\$0.10 per roll
Currency Purchased (Straps)	\$0.50 per strap

COLLECTIONS

Incoming/Outgoing Domestic	\$20.00
Incoming/Outgoing Foreign	\$50.00

DORMANT ACCOUNT

Dormant Account	\$5.00/month
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EARLY ACCOUNT CLOSURE

Closed in first 90 days	\$15.00
IRA closed in first six months	\$30.00

FAX MACHINE

Sending	\$1.00/page
Receiving	free

FOREIGN ITEMS

Currency Exchange (Canadian Currency)	5%
Currency Exchange (Excludes Canadian Currency)	\$50.00
Check Negotiation (Excludes Canadian Checks)	\$50.00
Foreign Drafts	\$50.00

GARNISHMENT AND LEVY FEE

Garnishment and Levy Fee	\$75.00
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MONEY MARKET/SAVINGS

Savings Excess Activity Fee (over six withdrawals)	\$1.00
Money Market Excess Activity Fee	\$5.00
<i>Preauthorized transfers and checks limited to six per month</i>	

NIGHT DEPOSITORY

Locking Bags	\$25.00
Zipper Bags - small	\$4.00
Zipper Bags - large	\$6.50

ONLINE BANKING AND BILL PAY

Online Banking and Bill Pay	Free
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OVERDRAFT/RETURNED ITEMS

Overdraft Fee - Item Paid	\$30.00/per item
Non-sufficient Funds Fee - Item Returned <i>(including re-presented items previously returned)</i>	\$30.00/per item
Overdraft Fee	
Account overdrawn 14 days or more	\$5.00/per day
Returned Deposited Item Charge	\$5.00/per item
Overdraft Protection from Savings	\$5.00/transfer
Overdraft Protection from LOC (set-up and annual fee)	\$25.00

RESEARCH/COPY

Account Research (\$15.00 minimum)	\$30.00/hour
Copies of Statements <i>(older than 60 days)</i>	\$5.00/per statement
Copies of Checks <i>(older than 60 days)</i>	\$1.00/per check

SAFE DEPOSIT BOX FEES (FLORENCE & EUGENE ONLY)

Automatic payment is required for the annual rental fee from an Oregon Pacific Bank checking account.

Box Drilling Fee	\$150.00
Key Replacement Fee	\$15.00
Late Fee	\$15.00
<i>(See complete Safe Deposit Box Fee Schedule for more information)</i>	

STATEMENTS

Hold Statements	\$5.00/month
Duplicate Statements Mailing	\$5.00/month
Returned Statements (bad address)	\$5.00/month
Statement Balancing (\$15.00 minimum)	\$30.00/hour

STOP PAYMENTS

Stop Payments	\$20.00
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WIRE TRANSFERS

Domestic Wire Transfers (Incoming)	\$15.00
Domestic Wire Transfers (Outgoing)	\$20.00
International Wire Transfers (Incoming)	\$35.00
International Wire Transfers (Outgoing)	\$45.00

**Fees are subject to change at Oregon Pacific Bank's discretion.
Last revised: 08/18/2022*



BUSINESS ACCOUNTS

Fee Schedule

ACH SERVICES See Business Online Banking Fee Schedule

ATM/DEBIT CARD

Non-Oregon Pacific Bank ATM or Non-Money Pass ATM Transaction Fee	\$2.00
Replacement Card Fee	\$10.00
Overnight Card Order Rush Fee	\$120.00
International Fee	1.7%

CHECKS

Cashier's Checks	\$6.00
Counter Checks	\$0.25 each
<i>First four free with confirmed check order</i>	

COIN/CURRENCY HANDLING

Coin Machine - Clients	Free
Coin Machine - Non-clients (\$500 max amt)	\$5.00 or 2%
<i>(whichever is greater)</i>	
Coin Rolls Purchased	\$0.10 per roll
Currency Purchased (Straps)	\$0.50 per strap

COLLECTIONS

Incoming/Outgoing Domestic	\$20.00
Incoming/Outgoing Foreign	\$50.00

DORMANT ACCOUNT \$5.00/month

EARLY ACCOUNT CLOSURE

Closed in first 90 days	\$15.00
IRA closed in first six months	\$30.00

FAX MACHINE

Sending	\$1.00/page
Receiving	\$1.00/page

FOREIGN ITEMS

Currency Exchange (Canadian Currency)	5%
Currency Exchange (Excludes Canadian Currency)	\$50.00
Check Negotiation (Excludes Canadian Checks)	\$50.00
Foreign Drafts	\$50.00

GARNISHMENT AND LEVY FEE \$75.00

MERCHANT SERVICES/CREDIT CARD PROCESSING

Application Fee	\$25.00
Monthly Statement/Support Fee	\$10.00/month
Monthly PCI Compliance Fee	\$12.00/month
PCI Noncompliance Fee	\$59.99/month

MONEY MARKET/SAVINGS

Savings Excess Activity Fee (over six withdrawals)	\$1.00
Money Market Excess Activity Fee	\$5.00
<i>Preauthorized transfers and checks limited to six per month</i>	

NIGHT DEPOSITORY

Locking Bags	\$25.00
Zipper Bags - small	\$4.00
Zipper Bags - large	\$6.50

ONLINE BANKING

Online Banking (view and transfer only)	Free
Cash Management Online Services	\$10.00/month
<i>(See Business Online Banking Fee Schedule for Additional Details)</i>	

OVERDRAFT/RETURNED ITEMS

Overdraft Fee - Item Paid	\$30.00/per item
Non-sufficient Funds Fee - Item Returned <i>(including re-presented items previously returned)</i>	\$30.00/per item
Daily Overdraft Fee Account overdrawn 14 days or more	\$5.00/per day
Returned Deposited Item Charge (Check/ACH)	\$5.00/per item
Overdraft Protection from Savings	\$5.00/transfer

RESEARCH/COPY

Account Research (\$15.00 minimum)	\$30.00/hour
Copies of Statements (older than 60 days)	\$5.00/per statement
Copies of Checks (older than 60 days)	\$1.00/per check

SAFE DEPOSIT BOX FEES (FLORENCE & EUGENE ONLY)

Automatic payment is required for the annual rental fee from an Oregon Pacific Bank checking account.

Box Drilling Fee	\$150.00
Key Replacement Fee	\$15.00
Late Fee	\$15.00

(See complete Safe Deposit Box Fee Schedule for more information)

STATEMENTS

Hold Statements	\$5.00/month
Duplicate Statements Mailing	\$5.00/month
Returned Statements (bad address)	\$5.00/month
Statement Balancing (\$15.00 minimum)	\$30.00/hour

STOP PAYMENTS- IN PERSON \$20.00

STOP PAYMENTS- ONLINE \$15.00

SWEEP ACCOUNTS

Loan Link Sweep	\$150.00/month
Sweeps - Up to 2 Accounts	\$25.00/month
Sweeps - 3 to 5 Accounts	\$50.00/month
Sweeps - 6 to 9 Accounts	\$75.00/month

WIRE TRANSFER

Domestic Wire Transfers (Incoming)	\$15.00
Domestic Wire Transfers (Outgoing)	\$20.00
International Wire Transfers (Incoming)	\$35.00
International Wire Transfers (Outgoing)	\$45.00
International Wire Transfers - Nonprofit <i>(Outgoing, 1st 3 per month)</i>	\$15.00

**After the first three transfers per month for nonprofits, outgoing foreign wires will be charged the regular rate listed above.*

SEE ANALYSIS BUSINESS CHECKING FEE SCHEDULE FOR MORE INFORMATION ABOUT OUR BUSINESS ANALYSIS ACCOUNT.

**Fees are subject to change at Oregon Pacific Bank's discretion*

Last revised: 08/18/2022



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BUSINESS ONLINE BANKING

Fee Schedule

Monthly Maintenance Fee:

View and Transfer Only.	No charge
Cash Management Online Services.	\$10.00 per month
<i>(Monthly fee for Cash Management includes Complete Cash Management Online Services and telephone support)</i>	

Additional Fees with Cash Management Online Services:

Domestic Wire Transfers (Outgoing)	\$15.00 per wire
International Wire Transfers (Outgoing)	\$35.00 per wire
Stop Payment Fee.	\$15.00 per stop

Remote Deposit Capture

One-time set up fee.	\$100.00*
Monthly maintenance fee.	\$15.00 per month*
Single-feed scanner hardware lease.	\$25.00 per month
Multi-feed scanner hardware lease.	\$40.00 per month

Positive Pay

Checks/Account.	\$10.00 per month
ACH/Account.	\$10.00 per month

ACH Batch Processing Fees:

Online ACH Origination.	\$15.00 per month
ACH batches.	\$5.00 per batch
Per item fee within batch (<i>Up to 50 items per month no charge</i>)	\$0.11 per item
Single ACH External Transfers (<i>to or from same ownership accounts only</i>)	No charge

Special Processing Fees

Batch Reversals.	\$5.00 per batch
Research on items (<i>\$15.00 minimum</i>)	\$20.00 per hour
Third-Party Sender compliance fee.	\$100 per month

**Fees are subject to change at Oregon Pacific Bank's discretion
Last revised: 08/22/2019*





TO: Community Reinvestment Act – Public File

CRA COMPLIANCE: *'Written Comments from the Public'*

As of 3/8/2024, and during the prior two calendar years, there have been no written comments received from the public specifically related to the Bank's performance in helping to meet community credit needs.

Catherine Green
VP, Compliance Officer & CRA Officer

3/8/2024

Date



LOAN-TO-DEPOSIT RATIO FOR 2023

<u>Date</u>	<u>Ratio</u>
3/31/2023	70.34
6/30/2023	74.06
9/30/2023	77.11
12/31/2023	79.93



Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.