

CRA PUBLIC FOLDER



Our Story

First Bank has been helping meet the financial needs of the residents and businesses of Lee, Hendry, Glades, Collier, and Palm Beach Counties since 1922.

First Bank is dedicated to being a well-respected financial institution with sound leadership and commitment to our communities. We strive to provide friendly and professional service to our customers and employees while providing a reasonable return to our shareholders.

We strongly believe it is this commitment that will support our mission to be attentive, invested, and involved in the efforts of our customers, communities, and team.

Locations

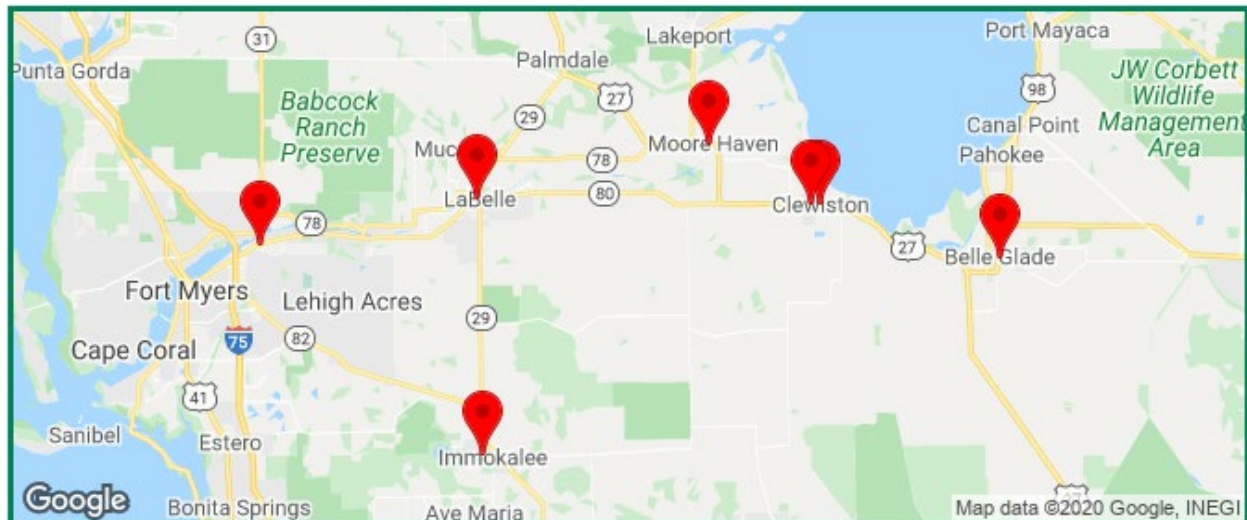


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BANK CONTACT INFORMATION

**First Bank
300 E Sugarland Hwy
Clewiston, FL 33440
(863) 983-8191**

Or:

**Jayne Skinner
VP Compliance and CRA Officer
300 E Sugarland Hwy
Clewiston, FL 33440**

First Bank will maintain a copy of this file for public inspection upon request and at no cost at its main office. First Bank will also maintain a copy of its most recent CRA Performance Evaluation, and a list of services provided at each branch office. First Bank will comply with any CRA public file requests within five calendar days and update this file no later than April 1 of each calendar year.

WRITTEN COMMENTS FROM PUBLIC (2022-2023)

Attached below this page are any written comments received from the public related to First Bank's Community Reinvestment Act (CRA) performance and any applicable bank response from the prior two calendar years. If you have comments regarding First Bank's CRA performance, please contact us at:

**First Bank
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Clewiston, FL 33440
(863) 983-8191**

OR:

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VP Compliance and CRA Officer
300 E Sugarland Hwy
Clewiston, FL 33440**

First Bank did not receive any written comments from the public during the two calendar years from 2022 – 2023.

CRA PERFORMANCE EVALUATION

First Bank's most recent CRA Performance Evaluation completed on November 15, 2021, by FDIC, is attached after this page. First Bank received a rating of Satisfactory. If you have any questions regarding this performance evaluation, please contact us at:

**First Bank
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PUBLIC DISCLOSURE

November 15, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bank
Certificate Number: 9620

300 East Sugarland Highway
Clewiston, Florida 33440

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

10 10th Street NE, Suite 800
Atlanta, Georgia 30309-3849

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

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INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment areas' credit needs.
- The bank originated a majority of loans reviewed within the assessment areas.
- The geographic distribution of loans reflected a reasonable dispersion throughout the assessment areas.
- The borrower profile distribution reflected a reasonable penetration among individuals of different income levels and businesses and farms of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Outstanding.

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

DESCRIPTION OF INSTITUTION

Established in January 1922, First Bank is a state-chartered, community bank headquartered in Clewiston, Hendry County, Florida. The bank is a wholly owned subsidiary of Pioneer Bankcorp, Inc., a one-bank holding company also located in Clewiston. First Bank does not have any affiliate relationships or subsidiaries. No merger or acquisition activity has taken place during the evaluation period. The bank received a Satisfactory rating at the previous FDIC CRA Performance Evaluation, dated February 4, 2019, based on Interagency Intermediate Small Institution Examination Procedures.

First Bank operates seven banking offices within its assessment areas, two of which are limited-service. The main office and two other offices are located in Hendry County, and the remaining four offices are located in Glades, Lee, Palm Beach, and Collier counties. Four of the bank's offices are located in upper-income census tracts, one in a distressed middle-income census tract, and two in moderate-income census tracts. Lobby hours are reasonable with Saturday hours until 1:00 pm at some locations. Since the previous CRA evaluation, the bank has not opened or closed any offices.

The institution offers a variety of products and services to meet the needs of its communities. Deposit services include checking, savings, money market, certificates of deposit, and individual retirement accounts. Lending products include home mortgage loans and equity lines of credit, agricultural and commercial real estate loans, business lines of credit, and consumer secured and unsecured credit. Alternative banking services include internet, mobile, and telephone banking. The institution also operates automated teller machines (ATMs) at all offices.

The bank also offers loans through the U.S. Small Business Administration (SBA), which includes the 7(a) Paycheck Protection Program (PPP). Specifically, First Bank originated 617 PPP loans, totaling \$54.9 million, in 2020, and 287 PPP loans, totaling \$19.2 million, as of June 2021. The SBA guarantees these loans under the Coronavirus Aid, Relief, and Economic Security Act, commonly known as the CARES Act. The loans serve to retain jobs that would otherwise be lost due to business closures because of the COVID-19 emergency.

As of the September 30, 2021 Consolidated Reports of Condition and Income (Call Report), First Bank had total assets of \$573.1 million, with loans totaling \$347.8 million, or 60.7 percent of total assets. As shown in the following table, business loans (loans secured by non-farm, non-residential properties and commercial and industrial loans) remain the bank's primary focus and represented the largest portion of the loan portfolio at 48.1 percent. This was followed by home mortgage loans (one-to-four family residential property loans) and farm loans (farmland and agricultural loans) which represented 20.5 percent and 15.9 percent, respectively.

Loan Portfolio Distribution as of 09/30/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	28,022	8.1
Secured by Farmland	41,002	11.8
Secured by 1-4 Family Residential Properties	71,303	20.5
Secured by Multifamily (5 or more) Residential Properties	6,669	1.9
Secured by Nonfarm Nonresidential Properties	126,897	36.5
Total Real Estate Loans	273,893	78.8
Commercial and Industrial Loans	40,320	11.6
Agricultural Production and Other Loans to Farmers	14,238	4.1
Consumer Loans	8,245	2.4
Obligations of State and Political Subdivisions in the U.S.	11,084	3.1
Other Loans	0	0.0
Total Loans	347,780	100.0
<i>Source: Reports of Condition and Income</i>		

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

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. First Bank delineated its assessment areas in compliance with the CRA regulatory requirements. The bank's assessment areas include whole geographies and do not arbitrarily exclude any low- or moderate-income geographies that it would reasonably be expected to serve. The bank's assessment areas remain unchanged since the previous evaluation.

First Bank's four assessment areas consist of portions of five contiguous counties along the southeastern coast of Florida. The designated assessment areas include portions of the Florida Non-Metropolitan Statistical Area (FL Non-MSA), which consists of all of Hendry and Glades counties. The Cape Coral-Fort Myers, Florida MSA (Cape Coral MSA) consists of portions of Lee County. The Naples-Immokalee-Marco Island, Florida MSA (Naples MSA) consists of portions of Collier County. The last assessment area consists of portions of Palm Beach County, which is part of the West Palm Beach-Boca Raton-Boynton Beach, Florida Metropolitan Division (West Palm Beach MD). The following table provides a description of the assessment areas. Please refer to the individual assessment areas for additional information.

Description of Assessment Areas			
Assessment Area	Assessment Area Counties	# of Census Tracts	# of Branches
FL Non-MSA Assessment Area	Hendry and Glades	11	4
Cape Coral MSA Assessment Area	Lee	6	1
Naples MSA Assessment Area	Collier	6	1
West Palm Beach MD Assessment Area	Palm Beach	7	1

Source: Bank Records and 2015 American Community Survey (ACS) Census Data

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated February 4, 2019, to the current evaluation. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate the bank’s CRA performance. As described in the Appendices, these procedures include two tests: the CRA Small Bank Lending Test and the Community Development Test.

Examiners conducted full-scope reviews of the bank’s performance in the FL Non-MSA, Cape Coral MSA, and West Palm Beach MD assessment areas, given the level of home mortgage, small business, and small farm lending activity in these assessment areas. Examiners conducted a limited-scope review of the Naples MSA assessment area because the level of the bank’s lending in this area is considerably lower in comparison to the other three assessment areas.

Examiners consider a bank’s lending data, deposit volume, and number of branches to determine which assessment areas receive the most weight in evaluating the bank’s overall CRA performance. Examiners gave more weight to the bank’s lending in the FL Non-MSA assessment area because it accounted for a majority of bank’s lending activity (58.6 percent), deposit volume (68.9 percent), and number of offices (57.1 percent). Refer to the table below for additional details.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans*		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
FL Non-MSA Assessment Area	22,315	58.6	361,633	68.9	4	57.1
Cape Coral MSA Assessment Area	9,188	24.1	94,342	17.9	1	14.3
West Palm Beach MD Assessment Area	1,969	12.1	26,665	5.0	1	14.3
Naples MSA Assessment Area	4,612	5.2	43,609	8.2	1	14.3
Total	38,084	100.0	526,249	100.0	7	100.0

*Source: 2020 HMDA Reported Data; 2020 Bank Records; and FDIC Summary of Deposits as of June 30, 2020. Due to rounding, totals may not equal 100 percent. *Includes home mortgage, small business, and small farm loans during review periods.*

Activities Reviewed

For the Lending Test, the CRA requires a review of the lending performance of a bank in its defined assessment areas with respect to home mortgage, small business loans, and small farm loans, if significant. First Bank’s major product line is small business loans followed by home mortgage loans and small farm loans. This conclusion considered the bank’s business strategy, as well as the number and dollar volume of loans originated or purchased during the evaluation period.

Based on the September 30, 2020 Consolidated Report of Condition and Income (Call Report) and bank data, examiners determined that First Bank's major loan products are small business, home mortgage, and small farm loans. First Bank is subject to the Home Mortgage Disclosure Act (HMDA) and, as such, is required to collect and report certain data concerning applications for home purchase, home refinance, and home improvement loans. Therefore, this evaluation included an analysis of the bank's HMDA loans originated from January 1, 2019, through December 31, 2020. In 2019, the bank originated 107 loans totaling \$23.2 million; and in 2020, the bank originated 163 home mortgage loans totaling 37.5 million. The bank's home mortgage lending performance was compared to demographic data based on 2015 ACS Census data and the 2019 and 2020 HMDA aggregate data.

The CRA evaluation also included an analysis of small business and small farm loans, as defined in the *Glossary*. During the time period from January 1, 2020, through December 31, 2020, the bank originated 928 small business loans totaling \$74.7 million. From the universe of 928 small business loans, examiners analyzed a random sample of 213 small business loans totaling \$17.9 million to assess the bank's lending performance. During the same time period, the bank originated 45 small farm loans totaling \$8.9 million. Examiners analyzed the entire universe of small farm loans to assess the bank's lending performance. Examiners used Dunn & Bradstreet (D&B) business demographic data for 2020 for comparison purposes.

The high volume of loan originations in 2020, due to the PPP loans, is not reflective of the bank's lending during the entire evaluation period. Therefore, a review was also conducted of the bank's 2019 small business and small farm data. In 2019, the bank originated 340 small business loans totaling \$23.5 million and 32 small farm loans totaling \$4.7 million. The entire universe was used for both loan products to evaluate the bank's 2019 lending performance. Examiners used D&B business demographic data for 2019 for comparison purposes.

For the Lending Test, in terms of number of originations, the bank originated more small business and home mortgage loans compared to small farm loans during the evaluation period. Therefore, in arriving at the overall CRA rating, small business loans received the most weight, followed by home mortgage loans. Small farm loans received the least weight based on the level of lending. While the number and dollar volume of loans were presented, examiners emphasized performance by number of loans. The number of loans is a better indicator of the number of individuals and businesses served.

For the Community Development Test, examiners reviewed information provided by management on community development loans, qualified investments, and community development services from February 5, 2019 through November 15, 2021.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, First Bank demonstrated reasonable performance under the Lending Test. The bank's performance is based on the bank's reasonable loan-to-deposit ratio; a majority of home mortgage,

small business, and small farm loans originated within the assessment areas; a reasonable distribution of loans to borrowers of different income levels and businesses and farms of different sizes; and a reasonable penetration of home mortgage, small business, and small farm loans throughout the assessment areas.

Loan-to-Deposit Ratio

The bank’s average net loan-to-deposit (NLTD) ratio is reasonable given the institution’s size, financial condition, and assessment areas’ credit needs. The NLTD ratio for the previous 11 quarters averaged 72.3 percent. Since the previous evaluation, the bank’s NLTD ratio ranged from a high of 78.1 percent on September 30, 2019, to a low of 63.4 percent on June 30, 2021.

The following table presents the average NLTD ratio for First Bank as well as for comparable institutions based on geographic location, lending focus, and asset size. As shown below, First Bank maintained an average NLTD ratio that was consistent with the comparable banks.

Loan-to-Deposit Ratio Comparison		
Institution	Total Assets \$(000s)	Average NLTD Ratio (%)
First Bank, Clewiston, Florida	524,583	72.3
Intercredit Bank, NA., Miami, Florida	364,445	98.7
Charlotte State Bank & Trust, Port Charlotte, Florida	533,179	53.5
Englewood Bank & Trust, Englewood, Florida	464,337	56.9
Heartland National Bank, Sebring, Florida	580,269	37.1

Source: Call Reports 3/31/2019 – 9/30/2021

Also, the bank’s average NLTD ratio was compared to its peer group, as identified in the Uniform Bank Performance Report (UBPR). The UBPR’s Peer Group includes insured commercial banks having total assets between \$300 million and \$1.0 billion. First Bank’s average NLTD ratio of 72.3 percent, as of September 30, 2021, was comparable to the Peer Group’s average NLTD ratio of 78.4 percent for the same period.

Assessment Area Concentration

Overall, the bank originated a majority of loans inside its assessment areas. The following table provides further details about the combined assessment areas’ lending concentration.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	83	77.6	24	22.4	107	14,926	64.4	8,240	35.6	23,166
2020	106	65.0	57	35.0	163	19,726	52.6	17,767	47.4	37,493
Subtotal	189	70.0	81	30.0	270	34,652	57.1	26,007	42.9	60,659
Small Business										
2019	297	87.4	43	12.6	340	14,847	63.3	8,620	36.7	23,467
2020	149	70.0	64	30.0	213	10,150	56.9	7,702	43.1	17,852
Subtotal	446	80.7	107	19.3	553	24,997	60.5	16,322	39.5	41,319
Small Farm										
2019	26	81.3	6	18.8	32	3,530	75.2	1,165	24.8	4,695
2020	42	93.3	3	6.7	45	8,208	92.2	691	7.8	8,899
Subtotal	68	88.3	9	11.7	77	11,738	86.3	1,856	13.7	13,594
<i>Source: 2019 and 2020 HMDA Reported Data and Bank Records</i>										

Geographic Distribution

The overall geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. The bank’s reasonable performance in the Florida Non-MSA and West Palm Beach assessment areas support this conclusion. Examiners focused on the number of loans originated in low- and moderate-income census tracts, and only loans originated within the assessment areas were included in the analysis. Refer to the *Geographic Distribution* sections of each assessment area for a discussion of the bank’s performance in those areas.

Borrower Profile

The distribution of loans to borrowers reflects, given the demographics of the assessment areas, a reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes. The bank’s reasonable performance in the Florida Non-MSA and West Palm Beach assessment areas support this conclusion. Only loans originated within the assessment areas were included in the analysis. Refer to the *Borrower Profile* sections of each assessment area for a discussion of the bank’s performance in those areas.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

The institution demonstrated an excellent responsiveness to the community development needs of the assessment areas. First Bank met those needs through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities for community development in the institution’s assessment areas.

Community Development Loans

First Bank originated 143 community development loans totaling \$39.9 million during the evaluation period. The dollar amount of the community development loans equates to 12.3 percent of average total loans and 8.0 percent of average total assets. The number and dollar volume of First Bank’s community development loans increased since the previous evaluation. Further, the bank’s community development lending performance exceeded similarly situated banks.

By number of community development loans, 90.2 percent supported the revitalization and stabilization of low- and moderate-income areas or distressed or underserved nonmetropolitan middle-income geographies, 4.9 percent supported economic development, 4.2 percent supported affordable housing, and 0.7 percent supported community services. In addition, 39.9 percent were originated in the FL Non-MSA assessment area, 3.5 percent were originated in the Cape Coral MSA assessment area, 9.7 percent were originated in the West Palm Beach MD assessment area, 6.3 percent were originated in the Naples MSA assessment area, and 40.6 percent were originated outside of the assessment areas but benefiting the broader statewide area.

First Bank met the needs of its assessment areas through the noted community development loans. Therefore, the bank received consideration for 58 loans, totaling \$10.3 million, originated outside of the assessment areas but benefiting the broader statewide area. For example, in 2021, the bank originated 52 PPP loans, totaling \$4.8 million, to stabilize and revitalize low- and moderate-income geographies within the State of Florida.

The following table reflects the bank’s community development lending activity by year and purpose. Refer to the *Community Development Loans* section within each assessment area for further details on the bank’s community development lending activities.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2/5/2019-12/31/2019	4	1,394	1	675	2	3,499	5	1,402	12	6,970
2020	2	539	0	0	5	4,956	8	12,220	15	17,715
1/1/2021-11/15/2021	0	0	0	0	0	0	116	15,248	116	15,248
Total	6	1,933	1	675	7	8,455	129	28,870	143	39,933
<i>Source: Bank Records</i>										

Additionally, the bank originated 79.7 percent by number and 23.8 percent by dollar of total community development loans through the SBA’s PPP. This temporary program was created through the Coronavirus Aid, Relief, and Economic Security Act and was intended to provide economic relief to small businesses adversely impacted under the Coronavirus Disease 2019 Emergency Declaration issued on March 13, 2020. The PPP supports economic development by sustaining small business operations by supporting job retention.

Qualified Investments

First Bank made 15 qualified donations totaling approximately \$102,000 during the evaluation period. The donations were made to organizations that support community development activities throughout the assessment areas. The qualified investments represent less than 0.1 percent of

average total assets and 0.2 percent of average total securities. Although the level of qualified investments declined from the last evaluation, it was comparable to similarly situated institutions.

By dollar volume, 84.3 percent of the qualified investments supported community services for low- and moderate-income individuals, 10.8 percent supported economic development, and 4.9 percent supported the revitalization and stabilization of low- and moderate-income geographies or distressed or underserved nonmetropolitan middle-income geographies. By dollar volume, 86.3 percent of the donations were made to organizations serving the FL Non-MSA assessment area, 0.9 percent were made to organizations serving the Cape Coral MSA assessment area, 1.0 percent were made to organizations serving the West Palm Beach MD assessment area, and 11.8 percent were made to organizations serving the Naples MSA assessment area.

The table on the following page illustrates the qualified investment totals by activity purpose during the evaluation period. Refer to the *Qualified Investments* section within each assessment area for further details on the bank’s qualified investment activities.

Qualified Investments (Donations)										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2/5/2019-12/31/2019	0	0	3	10	1	10	1	5	5	25
2020	0	0	7	64	1	1	0	0	8	65
1/1/2021-11/15/2021	0	0	2	12	0	0	0	0	2	12
Total	0	0	12	86	2	11	1	5	15	102

Source: Bank Data. Due to rounding, totals in this table may not equal the sum of the assessment area tables.

Community Development Services

First Bank provided qualified services in 140 instances that benefited 29 organizations throughout the assessment areas. The institution’s performance at the current evaluation exceeded the prior evaluation performance as well as the performance of similarly situated institutions. Specifically, at the prior evaluation, First Bank provided qualified services in 99 instances that benefited 26 organizations throughout the assessment areas.

During the review period, 119 instances of financial expertise or technical assistance were provided to 22 organizations in the FL Non-MSA assessment area; 2 instances to 1 organization in the West Palm Beach MD assessment area; 11 instances to 3 organizations in the Naples MSA assessment area; and 8 instances to 3 organizations in the Cape Coral MSA assessment area. The following tables illustrate the bank’s community development services activity by year, type, and assessment area. Refer to the *Community Development Services* section within each assessment area for further details on the bank’s community development services activities.

Community Development Services for All Assessment Areas					
Assessment Areas	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
FL Non-MSA AA	3	62	0	54	119
West Palm Beach MD AA	0	2	0	0	2
Naples MSA AA	0	5	0	6	11
Cape Coral MSA AA	0	5	0	3	8
Totals	3	74	0	63	140
<i>Source: Bank Records</i>					

Community Development Services for All Assessment Areas by Activity Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2/5/2019-12/31/2019	1	26	0	22	49
2020	1	24	0	21	46
1/1/2021-11/15/ 2021	1	24	0	20	45
Totals	3	74	0	63	140
<i>Source: Bank Records</i>					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

FLORIDA NON-MSA ASSESSMENT AREA – Full-Scope Review

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

The FL Non-MSA assessment area consists of all of Hendry and Glades Counties. These counties are adjacent to each other and are located in Non-MSA portions of Florida. The bank’s main office and three branches are located in this assessment area, representing 57.1 percent of total offices. The bank operates its main office and two branches in Hendry County and one branch in Glades County. All three offices in Hendry County are located in upper-income census tracts, and the office in Glades County is located in a distressed middle-income census tract. All of the offices offer depository ATMs and drive-through facilities except for the main office, which does not offer drive-through service. This assessment area accounts for 58.6 percent of total loans and 68.9 percent of total deposits.

Economic and Demographic Data

The FL Non-MSA assessment area includes 11 census tracts, which consist of two census tracts for which income was not available and two moderate-, five distressed (based on high poverty rates) middle-, and two upper-income census tracts. As shown in the following table, lending opportunities are limited in the assessment area because of the high percentage of families (20.9 percent) living below the poverty level. Poverty poses challenges for the bank’s home mortgage lending, as families living below the poverty level likely face difficulty in qualifying for a home mortgage loan. In addition to the high poverty level, the median housing value of \$80,423 could make it difficult for lower-income families to qualify for a home mortgage loan or to support a monthly mortgage payment. The following table outlines select demographic data of this assessment area based on the 2015 ACS Census data and the 2020 D&B data.

Demographic Information of the Florida Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	45.5	18.2	18.2
Population by Geography	51,635	0.0	19.2	50.6	30.2	0.0
Housing Units by Geography	21,273	0.0	21.1	49.1	29.8	0.0
Owner-Occupied Units by Geography	10,710	0.0	20.3	47.6	32.1	0.0
Occupied Rental Units by Geography	4,555	0.0	15.9	49.1	35.0	0.0
Vacant Units by Geography	6,008	0.0	26.5	51.6	21.9	0.0
Businesses by Geography	3,512	0.0	12.0	44.5	43.5	0.0
Farms by Geography	292	0.0	12.7	62.0	25.3	0.0
Family Distribution by Income Level	10,791	26.4	16.6	18.0	39.1	0.0
Household Distribution by Income Level	15,265	24.1	18.8	17.3	39.8	0.0
Median Family Income Non-MSAs - FL		\$46,899	Median Housing Value			\$80,423
			Median Gross Rent			\$681
			Families Below Poverty Level			20.9%
<small>Source: 2015 ACS Census data and 2020 D&B data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

Examiners used the Federal Financial Institutions Council’s (FFIEC) median family income (MFI) data to analyze the bank’s home mortgage lending under the *Borrower Profile* criterion. The following table reflects the MFI ranges for the low-, moderate-, middle-, and upper-income categories in the FL Non-MSA. These figures further support the potential difficulty lower-income families may face obtaining or maintaining a home mortgage loan.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2019 (\$50,800)	<\$25,400	\$25,400 to <\$40,640	\$40,640 to <\$60,960	≥\$60,960
2020 (\$52,600)	<\$26,300	\$26,300 to <\$42,080	\$42,080 to <\$63,120	≥\$63,120
<i>Source: FFIEC</i>				

According to the 2020 D&B data, there were 3,512 businesses in the assessment area. The analysis of small business loans under the *Borrower Profile* criterion compares the distribution of businesses by gross annual revenue (GAR) level. The following reflects GARs for these businesses: 88.5 percent had \$1.0 million or less, 2.6 percent had more than \$1.0 million, and 8.9 percent had unknown revenues.

According to the 2020 D&B data, there were 292 farms in the assessment area. The analysis of small farms loans under the *Borrower Profile* criterion compares the distribution of farms by GAR level. The following reflects GARs for these farms: 87.7 percent had \$1.0 million or less, 8.9 percent had more than \$1.0 million, and 3.4 percent had unknown revenues.

The largest sector of businesses in the assessment area include education, agriculture, health, government, professional and technical, and leisure and hospitality services. Major employers in the assessment area include the following in Hendry County: US Sugar Corp; Southern Gardens; A Duda & Sons; Hendry County Hospital Authority; Alico, Inc. In Glades County, the major employers include Moore Haven Correctional Facility, Lykes Bros., Brighton Seminole Bingo, Glades Electric Co-Op, and A Duda & Sons.

According to the Bureau of Labor Statistics, the unemployment rate in the assessment area increased during the evaluation period. For the years in the evaluation period, both counties unemployment rates were above state and national averages. The following table reflects the unemployment rates and trends for the assessment area, state, and national averages.

Unemployment Rates		
Area	2019	2020
	%	%
Hendry County	6.3	8.1
Glades County	4.1	5.6
State of Florida	3.2	5.1
U.S.	3.7	6.5
<i>Source: Bureau of Labor Statistics</i>		

Competition

First Bank operates in a competitive environment. In addition to competing with large national and regional banks, the bank also competes with local banks, credit unions, and finance companies. Internet banking also increases competition. According to the FDIC Deposit Market Share data, as of June 30, 2021, four financial institutions operated eight offices within the assessment area. Of these institutions, First Bank ranked first, with 57.1 percent market share.

There is also a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2020, 191 institutions reported 2,104 residential mortgage originations totaling \$334.4 million in this assessment area. First Bank ranked third with a market share of 6.1 percent.

The bank is not required to collect or report its small business loan data and has elected not to report such information. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. The aggregate data, however, reflects high demand for small business loans. Aggregate data for 2019 indicates 45 institutions reported 750 small business loans totaling \$19.0 million in this assessment area, indicating a high degree of competition for this product. The top five institutions accounted for 54.5 percent of the small business market share. Peer small business data was not yet available for 2020.

Community Contact

As part of the evaluation process, examiners contact community representatives to gain insight regarding the credit needs and economic conditions of a bank's assessment areas. The information gathered helps determine whether local financial institutions are responsive to these needs. Examiners contacted a representative of an organization that focuses on affordable housing and revitalization of low- and moderate-income areas. This contact, familiar with the economic conditions of the assessment area, stated that the area's economy is struggling to recover from the COVID-19 pandemic, which adversely impacted the assessment area. The contact stated that the area is in need of housing, specifically, affordable housing. The contact further stated that the area needs development to attract new businesses, which may also increase the demand for more housing. Additionally, the contact felt local banks have been meeting the credit needs of the assessment area; however, more can be done by offering more homeownership programs for low-income individuals.

Credit and Community Development Needs and Opportunities

Examiners determined that small business and affordable housing loans represent a primary credit need within the assessment area based on information from demographic, economic data, and the community contact. The high percentage of small businesses (88.5 percent) in the assessment area and the large number of businesses (67.3 percent) with four or fewer employees support this conclusion. With so many small businesses operating in the assessment area, funding for their operations is a primary credit need. Further, when considering the relatively high percentage of low- and moderate-income families, families living below poverty levels and the median family housing value, affordable housing represents another primary need for this area. Additionally, there is a need for financial assistance and small business credit given the adverse impacts of the COVID-19 pandemic.

CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA NON-MSA ASSESSMENT AREA

LENDING TEST

First Bank's lending performance within the FL Non-MSA assessment area reflects reasonable performance. The bank's reasonable Geographic Distribution and Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of home mortgage, small business, and small farm loans reflect reasonable distribution throughout the assessment area. Examiners based this conclusion on the reasonable distribution of home mortgage, small business, and farm loans. There are no low-income census tracts in the assessment area, and all of the middle-income census tracts are distressed or underserved.

Home Mortgage Loans

The geographic distribution of the home mortgage loans reflects a reasonable dispersion throughout the assessment area. As illustrated in the following table, in 2019 and 2020, though the bank's performance in moderate-income census tracts was below demographic data, it was comparable to aggregate performance.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate						
2019	20.3	8.8	6	9.0	1,023	8.5
2020	20.3	9.5	5	6.5	468	3.9
Middle						
2019	47.6	63.3	29	43.3	5,197	43.1
2020	47.6	59.1	34	44.2	5,257	43.6
Upper						
2019	32.1	27.9	32	47.8	5,837	48.4
2020	32.1	31.4	38	49.4	6,342	52.6
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Totals						
2019	100.0	100.0	67	100.0	12,058	100.0
2020	100.0	100.0	77	100.0	12,067	100.0
<i>Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. As illustrated in the following table, the percentage of loans in moderate-income census tracts exceeded demographic data in 2019. However, in 2020, the percentage of loans in moderate-income census tracts was below demographic data, but remains reasonable given the level of competition in the assessment area.

Geographic Distribution of Small Business Loans						
Tract Income Level		% of Businesses	#	%	\$(000s)	%
Moderate						
	2019	12.5	8	14.3	2,141	24.5
	2020	12.0	3	4.2	174	3.7
Middle						
	2019	42.8	13	23.2	2,709	31.0
	2020	44.5	25	35.2	2,157	44.9
Upper						
	2019	44.7	35	62.5	3,893	44.5
	2020	43.5	43	60.6	2,469	51.4
Total						
	2019	100.0	56	100.0	8,743	100.0
	2020	100.0	71	100.0	4,800	100.0
<i>Source: 2015 ACS Census Data; 2019 and 2020 D&B Data; and Bank Records. Due to rounding, totals may not equal 100.0%</i>						

Small Farm Loans

The geographic distribution of the small farm loans reflects a reasonable dispersion in the assessment area. As illustrated in the following table, in 2019 and 2020, the percentage of loans in moderate-income census tracts was below but comparable to demographic data.

Geographic Distribution of Small Farm Loans						
Tract Income Level		% of Farms	#	%	\$(000s)	%
Moderate						
	2019	12.4	2	8.7	85	2.9
	2020	12.7	3	9.7	475	8.7
Middle						
	2019	61.8	12	52.2	1,503	51.9
	2020	62.0	17	54.8	3,038	55.8
Upper						
	2019	25.8	9	39.1	1,307	45.1
	2020	25.3	11	35.5	1,935	
Total						
	2019	100.0	23	100.0	2,895	100.0
	2020	100.0	31	100.0	5,448	100.0
<i>Source: 2019 and 2020 D&B Data; and Bank Records. Due to rounding, totals may not equal 100.0%</i>						

Borrower Profile

The borrower profile distribution reflects reasonable penetration among individuals of different income levels and businesses and farms of different sizes throughout the assessment area. Examiners bases this conclusion on the reasonable penetration of home mortgage, small business loans, and small farm loans.

Home Mortgage Loans

The distribution of home mortgage loans reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels. In 2019, First Bank's lending performance to low-income borrowers was comparable to the aggregate performance, but was significantly below the percentage of low-income families. In 2020, the bank's lending

performance declined as the bank did not originate any home mortgage loans to low-income borrowers. Although the bank’s lending performance was consistently below the percentage of low- and moderate-income families, it was reasonable, considering the high poverty level at 20.9 percent. Specifically, these borrowers likely would not be able to qualify for a home mortgage loan.

Lending performance, in 2019 and 2020, to moderate-income borrowers is comparable to both aggregate performance data and the percent of moderate-income families. The following table reflects the geographic dispersion of the bank’s home mortgage lending in the assessment area.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	26.4	2.9	1	1.5	64	0.5
2020	26.4	1.6	0	0.0	0	0.0
Moderate						
2019	16.6	17.3	10	14.9	921	7.6
2020	16.6	14.9	9	11.7	941	7.8
Middle						
2019	18.0	23.7	13	19.4	1,372	11.4
2020	18.0	23.6	16	20.8	2,154	17.8
Upper						
2019	39.1	40.7	34	50.7	4,831	40.1
2020	39.1	41.1	41	53.2	7,085	58.7
Not Available						
2019	0.0	15.3	9	13.4	4,871	40.4
2020	0.0	18.7	11	14.3	1,887	15.6
Totals						
2019	100.0	100.0	67	100.0	12,058	100.0
2020	100.0	100.0	77	100.0	12,067	100.0
<i>Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of borrowers reflects reasonable penetration among business customers of different sizes. As illustrated in the following table, in 2019 and 2020, the bank’s percentage of loans to businesses with revenues of \$1.0 million or less was significantly below the percentage of businesses operating in the assessment area. However, examiners noted that the number of small business loans originated increased significantly in 2020, and the bank was not required to obtain the GAR for PPP loans. As a result, the bank’s percentage of loans with revenue not available in

2020 also increased. Of the 71 small business loans originated, 57 or 80.3 percent were PPP loans. Excluding PPP loans, First Bank level of small business lending is consistent with demographics, as 72.7 percent of these loans were made to businesses with GARs of \$1 million or less.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	87.8	30	53.6	4,795	54.8
2020	88.5	32	45.1	1,714	35.7
>\$1,000,000					
2019	2.9	22	39.3	3,038	34.7
2020	2.6	11	15.5	1,853	38.6
Revenue Not Available					
2019	9.3	4	7.1	911	10.4
2020	8.9	28	39.4	1,233	25.7
Totals					
2019	100.0	56	0.0	8,744	100.0
2020	100.0	71	0.0	4,800	0.0

*Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%*

Because revenues were not collected for PPP loans, examiners conducted an analysis of these loans by loan amounts as a proxy for revenues. As indicated below, 98.3 percent of the loans were less than \$250,000, which further demonstrated the bank’s willingness to make small business loans.

Distribution of PPP Loans by Loan Amount				
Loan Amount	#	%	\$(000s)	%
< \$100,000	42	73.7	1,243	34.1
\$100,000 - \$249,999	14	24.6	1,780	48.8
\$250,000 - \$499,999	0	0.0	0	0.0
\$500,000 - \$1,000,000	1	1.7	626	17.1
> \$1,000,000	0	0.0	0	0.0
Total	57	100.0	3,649	100.0

Source: Bank Data

Small Farm Loans

The distribution of borrowers reflects reasonable penetration among farm customers of different sizes. In 2019 and 2020, the bank’s percentage of loans to farms with revenues of \$1.0 million or less at 60.9 percent and 61.3 percent, respectively, was below demographics but reasonable. The following table presents the bank’s small farm loan borrower profile distribution.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000					
2019	86.9	14	60.9	1,445	49.9
2020	87.7	19	61.3	2,936	46.1
> \$1,000,000					
2019	9.8	9	39.1	1,450	50.1
2020	8.9	12	38.7	2,512	46.1
Revenue Not Available					
2019	3.3	0	0.0	0	0.0
2020	3.4	0	0.0	0.0	0.0
Total					
2019	100.0	23	100.0	2,895	100.0
2020	100.0	31	100.0	5,448	100.0

Source: 2019 and 2020 D&B Data and Bank Records. Due to rounding, totals may not equal 100.0 percent.

COMMUNITY DEVELOPMENT TEST

First Bank demonstrated excellent responsiveness to the community development needs of the FL Non-MSA assessment area. The bank met these needs through community development loans, qualified donations, and community development services.

Community Development Loans

First Bank originated 57 community development loans totaling \$18.9 million during the evaluation period in the Florida Non-MSA assessment area. This performance represents 39.9 percent by number and 47.5 percent by dollar volume of bank-wide community development loans. While the number of community development loans increased from the last evaluation, the total dollar amount of community development loans decreased but remains comparable to the last evaluation.

Regarding the community development purpose, a significant majority of the loans supported revitalization and stabilization of low- and moderate-income geographies or distressed or underserved nonmetropolitan middle-income geographies, followed by affordable housing and economic development. The following are notable examples of the bank’s community development loans in the assessment area.

- In 2019, the bank originated a loan for \$153,000 to a county in the assessment area to purchase two ambulances to serve an area where 57.1 percent of the census tracts are either moderate-income or distressed or underserved nonmetropolitan middle-income geographies.
- In 2019 and 2020, the bank renewed a letter of credit for \$250,000 to a city in a distressed or underserved nonmetropolitan middle-income geography which serves as a guarantee to provide the city with access to electricity.

The following table reflects the bank’s community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2/5/2019-12/31/2019	1	985	0	0	1	3,323	4	1,366	6	5,674
2020	1	150	0	0	1	3,066	1	250	3	3,466
1/1/2021-11/15/2021	0	0	0	0	0	0	48	9,825	48	9,825
Totals	2	1,135	0	0	2	6,389	53	7,404	57	18,965

Source: Bank Records

Qualified Investments

First Bank made 10 qualified investments (donations) totaling approximately \$88,000 in the FL Non-MSA assessment area during the evaluation period. All of the investments were donations to organizations that supported community development activities in the assessment area. By dollar volume, 83.0 percent of the donations provided community services to low- and moderate-income individuals, 11.4 percent supported economic development, and 5.7 percent supported revitalization and stabilization in low- and moderate-income geographies. The following are notable examples of the bank’s donation activities in the assessment area.

- In 2020, the bank donated \$40,000 to an educational institution to build an addition to a campus which primarily serves low- and moderate-income students.
- During the evaluation period, the bank donated a total of \$25,000 to an organization that provides healthcare to low- and moderate-income residents of the assessment area.
- In 2019, the bank donated a total of \$10,000 to an initiative with a goal of economic and population growth in a distressed or underserved nonmetropolitan middle-income geography.

The following table illustrates the bank’s qualified community development investments in this assessment area by year and purpose.

Qualified Investments (Donations)										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2/5/2019-12/31/2019	0	0	1	8	1	10	1	5	3	23
2020	0	0	5	53	0	0	0	0	5	53
1/1/2021-11/15/2021	0	0	2	12	0	0	0	0	2	12
Total	0	0	8	73	1	10	1	5	10	88

Source: Bank Records

Community Development Services

First Bank provided 119 qualified services benefiting 22 organizations throughout the FL Non-MSA assessment area. During the review period, First Bank provided 62 instances of community services activities, 54 instances of activities to revitalize or stabilize low- or moderate-income geographies or distressed or underserved non-metropolitan geographies, and 3 affordable housing activities. This represents 85.0 percent by number volume of the bank-wide community development services.

The following are notable examples of the bank’s community development services activities within the assessment area:

- An employee served on the board of directors of a school foundation that provides funding to schools where the students are from primarily low- and moderate-income families.
- An employee serves on the board of directors of an organization that works to improve housing for low- and moderate-income individuals.
- An employee serves on the board of directors of an organization that provides financial expertise to the local city commission to redevelop low-income areas within the city.

The following table represents the bank’s community development services activity by year and purpose.

Community Development Services- FL Non-MSA Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2/5/2019-12/31/2019	1	22	0	19	42
2020	1	21	0	18	40
1/1/2021-11/15/ 2021	1	19	0	17	37
Totals	3	62	0	54	119

Source: Bank Records

CAPE CORAL MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN CAPE CORAL MSA ASSESSMENT AREA

Cape Coral MSA assessment area consists of portions of Lee County. The bank operates one full-service branch in this assessment area, representing 14.3 percent of total offices. The branch offers a drive-through facility and a depository ATM. The branch is located in an upper-income census tract. This assessment area accounts for 24.1 percent of total loans and 17.9 percent of total deposits.

ECONOMIC AND DEMOGRAPHIC DATA

The Cape Coral MSA assessment area includes one moderate-, three middle-, and two upper-income census tracts. Of the housing units within the assessment area, 51.1 percent were owner-occupied units, 18.8 percent were rental units, and 30.1 percent were vacant units. The following table presents select demographic, housing, and economic information for the assessment area from the 2015 ACS Census and 2020 D&B data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	50.0	33.3	0.0
Population by Geography	14,027	0.0	5.7	67.7	26.6	0.0
Housing Units by Geography	7,289	0.0	7.3	63.8	28.9	0.0
Owner-Occupied Units by Geography	3,727	0.0	6.9	62.2	30.9	0.0
Occupied Rental Units by Geography	1,369	0.0	11.8	76.3	11.9	0.0
Vacant Units by Geography	2,193	0.0	5.1	58.8	36.2	0.0
Businesses by Geography	1,872	0.0	7.1	60.6	32.3	0.0
Farms by Geography	146	0.0	6.2	60.3	33.6	0.0
Family Distribution by Income Level	3,515	17.0	19.0	18.7	45.3	0.0
Household Distribution by Income Level	5,096	22.9	14.1	16.5	46.5	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		\$57,627	Median Housing Value			\$162,762
			Median Gross Rent			\$935
			Families Below Poverty Level			7.1%
<i>Source: 2015 ACS Census Data and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The assessment area's demographics affect mortgage loan demand among low-income borrowers within this assessment area. Specifically, with only 6.9 percent of owner-occupied housing units in the moderate-income census tract, lending opportunities in this geography is limited.

Examiners used the FFIEC's MFI data to analyze the bank's home mortgage lending under the *Borrower Profile* criterion. The following table reflects the MFI ranges for the low-, moderate-, middle-, and upper-income categories in the Cape Coral MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2019 (\$67,100)	<\$33,550	\$33,550 to <\$53,680	\$53,680 to <\$80,520	≥\$80,520
2020 (\$68,700)	<\$34,350	\$34,350 to <\$54,960	\$54,960 to <\$82,440	≥\$82,440
<i>Source: FFIEC</i>				

According to the 2020 D&B data, there were 1,872 businesses in the assessment area. The GARs for these businesses were as follows: 94.3 percent had \$1.0 million or less, 1.8 percent had more than \$1.0 million, and 3.9 percent had unknown revenues. According to the 2020 D&B data, there were 146 farms in the assessment area. The following reflects GARs for these farms: 95.9 percent

had \$1.0 million or less, 1.4 percent had more than \$1.0 million, and 2.7 percent has unknown revenues.

The largest sector of businesses in the area include leisure and hospitality, education, retail trade, government, and healthcare. Major employers in the area include Lee Memorial Health System; Publix Super Markets, Inc.; Florida Gulf Coast University; Walmart; and Hope Hospice.

According to the Bureau of Labor Statistics, the unemployment rate for Lee County was slightly above the state but below the national averages in 2019. However, unemployment rates spiked for all areas in 2020. The county unemployment rate was above both the state and national averages. The following table reflects the unemployment rates and trends for the assessment area, state, and nation.

Unemployment Rates		
Area	2019	2020
	%	%
Lee County	3.3	7.3
State of Florida	3.2	5.1
U.S.	3.7	6.5
<i>Source: Bureau of Labor Statistics</i>		

COMPETITION

There is a high level of banking competition within the assessment area. According to the *FDIC's June 30, 2021, Summary of Deposits Report*, there were 30 financial institutions operating 177 banking offices in the assessment area. First Bank ranked 23rd with a deposit market share of 0.5 percent.

There is also a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2020, 233 institutions reported 1,433 residential mortgage originations totaling \$383.8 million in this assessment area. Of these lenders, First Bank ranked 18th with a market share of 1.3 percent.

The bank is not required to collect or report small business loan data and has elected not to report such information. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. The aggregate data; however, reflects a high demand for small business loans. Aggregate data for 2019 indicates 141 institutions reported 21,110 small business loans totaling \$598.2 million in this assessment area, indicating a high degree of competition for this product. The top five institutions account for 26.6 percent of the small business market share. Peer small business data was not available for 2020.

Credit and Community Development Needs and Opportunities

Considering information from demographic and economic data, examiners identified certain credit and community development needs and opportunities within the assessment area. The relatively low number of owner-occupied housing units in the moderate-income census tract represents a need for affordable housing. Also, the relatively high number of low- and moderate-income families, in

comparison to home prices, further indicates a strong need for affordable housing. Additionally, small business and small farm loans are needed, as there are a significant percentage of businesses and farms with GARs of \$1.0 million or less.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CAPE CORAL MSA ASSESSMENT AREA

LENDING TEST

First Bank's lending performance within the Cape Coral MSA assessment area reflects poor performance. The bank's overall poor Geographic Distribution and Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects poor dispersion throughout the assessment area. Although the dispersion of home mortgage loans is reasonable, examiners based this conclusion on the poor dispersion of small business loans, which received the most weight. Examiners could not perform a meaningful analysis of small farm loans because of the low level of lending. There are no low-income census tracts in the assessment area.

Home Mortgage Loans

The geographic distribution of the home mortgage loans reflects a reasonable dispersion throughout the assessment area. In 2019, the bank did not originate any loans in the moderate-income census tract. However, in 2020, the bank's performance in the moderate income-census tract significantly exceeded aggregate performance and demographic data. The following table presents the bank's home mortgage loan geographic distribution.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate						
2019	6.9	5.1	0	0.0	0	0.0
2020	6.9	5.0	3	23.1	2,464	47.1
Middle						
2019	62.2	63.6	2	50.0	588	37.0
2020	62.2	61.6	8	61.5	2,283	43.6
Upper						
2019	30.9	31.3	2	50.0	1,000	63.0
2020	30.9	33.5	2	15.4	488	9.3
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Totals						
2019	100.0	100.0	4	100.0	1,588	100.0
2020	100.0	100.0	13	100.0	5,235	100.0

Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.

Small Business Loans

The geographic distribution of small business loans reflect poor dispersion throughout the assessment area. As illustrated in the following table, the bank did not originate any small business loans in the moderate-income census tract in 2019. In 2020, small business lending in the moderate-income census tract was below demographics.

Geographic Distribution of Small Business Loans						
Tract Income Level		% of Businesses	#	%	\$(000s)	%
Moderate						
	2019	7.9	0	0.0	0	0.0
	2020	7.1	1	1.7	446	15.5
Middle						
	2019	59.9	2	0.9	229	7.2
	2020	60.6	10	16.7	1,720	59.7
Upper						
	2019	32.2	223	99.1	2,931	92.8
	2020	32.3	49	81.6	717	24.8
Total						
	2019	100.0	225	100.0	3,160	100.0
	2020	100.0	60	100.0	2,883	100.0
<i>Source: 2019 and 2020 D&B Data; and Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>						

Small Farm Loans

In 2019, the bank originated only two small farm loans totaling \$540,000. In 2020, the bank originated five small farm loans totaling approximately \$1.1 million.

Borrower Profile

The borrower profile distribution reflects a poor penetration among individuals of different income levels and businesses and farms of different sizes in the assessment area. Examiners based this conclusion on the poor dispersion of home mortgage and small business loans. Examiners could not perform a meaningful analysis of small farm loans because of the low level of lending.

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among individuals of different income levels. As illustrated in the following table, in 2019 and 2020, the bank did not originate any home mortgage loans to low- or moderate-income borrowers. Examiners noted limited lending opportunities for the bank when considering the high median housing value at \$162,762, coupled with the MFI ranges for low- and moderate-income individuals.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	G					
2019	17.0	5.9	0	0.0	0	0.0
2020	17.0	3.6	0	0.0	0	0.0
Moderate						
2019	19.0	17.4	0	0.0	0	0.0
2020	19.0	13.7	0	0.0	0	0.0
Middle						
2019	18.7	20.6	0	0.0	0	0.0
2020	18.7	18.9	2	15.4	321	6.1
Upper						
2019	45.3	42.7	2	50.0	588	37.0
2020	45.3	45.2	10	76.9	3,639	69.5
Not Available						
2019	0.0	13.4	2	50.0	1,000	63.0
2020	0.0	18.6	1	7.7	1,275	24.4
Totals						
2019	100.0	100.0	4	100.0	1,588	100.0
2020	100.0	100.0	13	100.0	5,235	100.0
Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of borrowers reflects poor penetration among business customers of different sizes. As illustrated in the following table, the bank's lending is significantly below the percent of businesses with GARs of \$1 million or less in 2019 and 2020.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	94.3	2	0.9	229	7.2
2020	94.3	2	3.3	40	1.4
>\$1,000,000					
2019	1.8	222	98.7	2,828	89.5
2020	1.8	49	81.7	2,582	89.5
Revenue Not Available					
2019	3.9	1	0.4	103	3.3
2020	3.9	9	15.0	261	9.1
Totals					
2019	100.0	225	100.0	3,160	100.0
2020	100.0	60	100.0	2,883	100.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Small Farm Loans

In 2019, the bank originated one loan totaling \$240,000 to a borrower that had GARs less than \$1 million and another loan totaling \$300,000 to a borrower that had GARs greater than \$1 million. In 2020, the bank originated one loan totaling \$170,000 to a borrower that had GARs less than \$1 million and four loans totaling \$900,000 to borrowers that had GARs greater than \$1 million.

COMMUNITY DEVELOPMENT TEST

First Bank demonstrated adequate responsiveness to the community development needs of the assessment area. The bank met these needs through community development loans, qualified donations, and community development services.

Community Development Loans

During the evaluation period, First Bank originated five community development loans, totaling \$858,000, in the assessment area. This performance represents 3.5 percent by number and 2.2 percent by dollar volume of bank-wide community development loans. The bank's performance increased from the last evaluation, where the bank did not originate any community development loans. Regarding the community development purpose, a majority of the loans supported economic development, followed by revitalization and stabilization of low- and moderate-income geographies. The following is a notable example of the bank's community development loans in the assessment area.

- In 2020, the bank originated a loan for \$182,990 to fund the purchase of a building to grow and relocate a small business to a moderate-income census tract.

The following table reflects the bank’s community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2/5/2019-12/31/2019	0	0	0	0	1	176	0	0	1	176
2020	0	0	0	0	2	569	0	0	2	569
1/1/2021-11/15/2021	0	0	0	0	0	0	2	113	2	113
Totals	0	0	0	0	3	745	2	113	5	858

Source: Bank Records

Qualified Investments

First Bank made one qualified investment of \$600 in the assessment area during the evaluation period, which represents a decrease from the last evaluation. The investment was a donation in 2019 to an organization that supported community development activities in the assessment area. The organization provides community services to low- and moderate-income individuals by providing child care and scholarships to low- and moderate-income students.

Community Development Services

First Bank provided eight qualified services benefiting three organizations throughout the assessment area. These qualified activities served to revitalize or stabilize low- or moderate-income geographies or distressed or underserved geographies. This represents 6.0 percent by number volume of the bank-wide community development services. The following is a notable example of the bank’s community development services activities within the assessment area:

- An employee served on the council of an organization that markets and promotes business opportunities within the county to attract small businesses looking to relocate in order to create jobs.

The following table represents the bank’s community development services activity by year and purpose.

Community Development Services- Cape Coral MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2/5/2019-12/31/2019	0	2	0	1	3
2020	0	1	0	1	2
1/1/2021-11/15/ 2021	0	2	0	1	3
Totals	0	5	0	3	8

Source: Bank Records

WEST PALM BEACH MD ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN WEST PALM BEACH MD ASSESSMENT AREA

West Palm Beach MD assessment area consists of portions West Palm Beach County. The bank operates one full-service branch in this assessment area, representing 14.3 percent of total offices. The branch offers a drive-through facility and a depository ATM. The branch is located in a moderate-income census tract. This assessment area accounts for 12.1 percent of total loans and 17.9 percent of total deposits.

Economic and Demographic Data

West Palm Beach MD assessment area consists of seven census tracts, four low-, two moderate-, and one income not available census tracts. Of the housing units within the assessment area, 32.8 percent were owner-occupied units, 48.4 percent were rental units, and 18.8 percent were vacant units. The following table presents select demographic, housing, and economic information for the assessment area from the 2015 ACS Census and 2020 D&B.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	57.1	28.6	0.0	0.0	14.3
Population by Geography	26,461	52.3	46.4	0.0	0.0	1.3
Housing Units by Geography	8,657	52.6	47.4	0.0	0.0	0.0
Owner-Occupied Units by Geography	2,837	37.0	63.0	0.0	0.0	0.0
Occupied Rental Units by Geography	4,190	59.5	40.5	0.0	0.0	0.0
Vacant Units by Geography	1,630	62.0	38.0	0.0	0.0	0.0
Businesses by Geography	1,416	45.3	53.9	0.0	0.0	0.8
Farms by Geography	63	25.4	71.4	0.0	0.0	3.2
Family Distribution by Income Level	4,732	47.6	24.4	11.7	16.3	0.0
Household Distribution by Income Level	7,027	45.3	22.9	15.1	16.8	0.0
Median Family Income MSA - 48424 West Palm Beach-Boca Raton- Boynton Beach, FL		\$65,914	Median Housing Value			\$92,050
			Median Gross Rent			\$621
			Families Below Poverty Level			29.1%
<i>Source: 2015 ACS Census Data and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The assessment area’s demographics affect mortgage loan demand among low-income borrowers within this assessment area. Specifically, with 29.1 percent of the assessment area’s families living

below the poverty level, lending opportunities may be limited as these families may have difficulty qualifying for credit. Additionally, only 32.8 percent of housing units within the assessment are owner-occupied, which further limits opportunities to lend.

Examiners used the FFIEC’s MFI data to analyze the bank’s home mortgage lending under the *Borrower Profile* criterion. The following table reflects the MFI ranges for the low-, moderate-, middle-, and upper-income categories in the West Palm Beach MD.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2019 (\$75,400)	<\$37,700	\$37,700 to <\$60,320	\$60,320 to <\$90,480	≥\$90,480
2020 (\$79,100)	<\$39,550	\$39,550 to <\$63,280	\$63,280 to <\$94,920	≥\$94,920
<i>Source: FFIEC</i>				

According to the 2020 D&B data, there were 1,416 businesses in the assessment area. The GARs for these businesses were as follows: 82.6 percent had \$1.0 million or less, 4.3 percent had more than \$1.0 million, and 13.1 percent had unknown revenues. According to the 2020 D&B data, there were 63 farms in the assessment area. The following reflects GARs for these farms: 84.1 percent had \$1.0 million or less, 11.1 percent had more than \$1.0 million, and 4.8 percent has unknown revenues. The largest sector of businesses in the area include professional and business, education and health, leisure and hospitality, retail trade, and government. Major employers in the area include Publix Super Markets, Inc.; Tenet Healthcare Corp.; NextEra Energy/Florida Power & Light Co.; Comcast; and Hospital Corp. of America.

According to the Bureau of Labor Statistics, the unemployment rate for Palm Beach County was slightly above the state but below the nation in 2019. However, unemployment rates spiked for all areas in 2020. The county unemployment rate was above both the state and national averages. The following table reflects the unemployment rates and trends for county, state, and nation.

Unemployment Rates		
Area	2019	2020
	%	%
Palm Beach County	3.4	7.6
State of Florida	3.2	5.1
Nation	3.7	6.5
<i>Source: Bureau of Labor Statistics</i>		

COMPETITION

There is a high level of banking competition within the assessment area. According to the *FDIC’s June 30, 2021, Summary of Deposits Report*, there were 49 financial institutions operating 409 banking offices in the assessment area. First Bank ranked 39th and held a deposit market share of 0.4 percent.

There is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2020, 70 institutions reported 223 residential mortgage originations totaling \$34.1 million in this assessment area. Of these lenders, First Bank ranked fourth with a market share of 5.8 percent.

The bank is not required to collect or report small business loan data and has elected not to report such information. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. The aggregate data; however, reflects a high demand for small business loans. Aggregate data for 2019 indicates 154 institutions reported 65,312 small business loans totaling \$1.7 billion in this assessment area, indicating a high degree of competition for this product. The top five institutions account for 68.3 percent of the small business market share. Peer small business data was not available for 2020.

Credit and Community Development Needs and Opportunities

Considering information from demographic and economic data, examiners identified certain credit and community development needs and opportunities within the assessment area. The relatively high percentage of families living below the poverty level, in comparison to home prices, indicates a strong need for affordable housing. Also, the relatively high percentage of occupied rental units further indicates that there may be a need for affordable housing home loan programs. Small business and small farm loans are also needed, as there are a significant percentage of businesses and farms with GARs of \$1.0 million or less.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WEST PALM BEACH MD ASSESSMENT AREA

LENDING TEST

First Bank's lending performance within the assessment area reflects reasonable performance. The bank's overall reasonable *Geographic Distribution* and *Borrower Profile* performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable distribution throughout the assessment area. Examiners based this conclusion on a reasonable distribution of home mortgage and small business loans. Examiners could not perform a meaningful analysis of small farm loans because of the low level of lending.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects a reasonable dispersion in the assessment area. As illustrated in the following table, in 2019, the bank's performance in low-income census tracts exceeded aggregate data and demographic data. In 2020, although the bank's performance in low-income census tracts was below demographic data, it exceeded aggregate performance. In 2019, the bank's performance in moderate-income census tracts was less than aggregate performance and demographic data. However, in 2020, the bank's performance improved and exceeded demographic data and was comparable to aggregate performance.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	37.0	23.8	4	44.4	553	52.0
2020	37.0	21.9	3	27.3	859	48.6
Moderate						
2019	63.0	76.2	5	55.6	510	48.0
2020	63.0	78.1	8	72.7	908	51.4
Middle						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Upper						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Totals						
2019	100.0	100.0	9	100.0	1,063	100.0
2020	100.0	100.0	11	100.0	1,767	100.0
Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The geographic distribution of the small business loans reflects reasonable dispersion throughout the assessment area. As illustrated in the following table, the bank's performance in low-income census tracts was below demographic data in 2019 and 2020. Nonetheless, in 2019 and 2020, the bank's lending performance in moderate-income census tracts significantly exceeded demographic data.

Geographic Distribution of Small Business Loans						
Tract Income Level		% of Businesses	#	%	\$(000s)	%
Low						
	2019	44.4	2	28.6	424	28.7
	2020	45.3	3	30.0	828	48.8
Moderate						
	2019	54.8	5	71.4	1,051	71.3
	2020	53.9	7	70.0	867	51.2
Total						
	2019	100.0	7	100.0	1,475	100.0
	2020	100.0	10	100.0	1,695	100.0
<i>Source: 2019 and 2020 D&B Data; and Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>						

Small Farm Loans

In 2019, the bank did not originate any loans in low-income census tracts. The bank's performance increased slightly in the moderate-income census tract. The bank originated one loan totaling \$94,000 in the moderate-income census tract. In 2020, the bank originated one small farm loan totaling \$500,000 in the low-income census tract. In moderate-income census tracts, the bank originated two loans totaling \$650,000.

Borrower Profile

The borrower profile distribution reflects reasonable penetration among individuals of different income levels and businesses of different sizes in the assessment area. Examiners based this conclusion on the reasonable penetration of home mortgage. While the penetration of small business loans was poor, the bank's performance improved in 2020. Examiners could not perform a meaningful analysis of small farm loans because of the low level of lending.

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels. In 2019 and 2020, the bank did not originate any home mortgage loans to low-income borrowers. When considering a poverty level of 29.1 percent, the high poverty level in this assessment area has limited the bank's lending opportunities to these borrowers. In 2019 and 2020, the bank's lending to moderate-income borrowers was comparable to aggregate lending and demographic data. The following table reflects the distribution of the bank's home mortgage lending to individuals of different income levels.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	47.6	7.9	0	0.0	0	0.0
2020	47.6	9.4	0	0.0	0	0.0
Moderate						
2019	24.4	25.7	2	22.2	188	17.7
2020	24.4	27.3	2	18.2	167	9.5
Middle						
2019	11.7	21.8	1	11.1	98	9.2
2020	11.7	25.0	2	18.2	239	13.5
Upper						
2019	16.3	18.8	2	22.2	269	25.3
2020	16.3	18.0	5	45.5	948	53.7
Not Available						
2019	0.0	25.7	4	44.4	508	47.8
2020	0.0	20.3	2	18.2	412	23.3
Totals						
2019	100.0	100.0	9	100.0	1,063	100.0
2020	100.0	100.0	11	100.0	1,767	100.0
<i>Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of borrowers reflects poor penetration among business customers of different sizes. As illustrated in the following table, First Bank's lending to businesses with GARs of \$1 million or less was significantly below the percentage of those businesses operating within the assessment area in 2019. While the bank's lending performance increased in 2020, the level was still below demographics.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	81.4	1	14.3	325	22.0
2020	82.6	6	60.0	678	40.0
>\$1,000,000					
2019	4.9	6	85.7	1,150	78.0
2020	4.3	4	40.0	1,017	60.0
Revenue Not Available					
2019	13.7	0	0.0	0	0.0
2020	13.1	0	0.0	0	0.0
Totals					
2019	100.0	7	100.0	1,475	100.0
2020	100.0	10	100.0	1,695	100.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Small Farm Loans

In 2019, the bank originated one loan totaling 94,000 to a borrower that had GAR of more than \$1 million. In 2020, the bank originated three small farm loans. One loan totaling \$500,000 was originated to a borrower that had GAR of less than \$1 million and the other two loans totaling \$650,000 were originated to borrowers with GARs greater than \$1 million.

COMMUNITY DEVELOPMENT TEST

First Bank demonstrated adequate responsiveness to the community development needs of the assessment area. The bank met these needs through community development loans, qualified donations, and community development services.

Community Development Loans

First Bank originated 14 community development loans totaling \$3.9 million during the evaluation period in the assessment area. This represents 9.8 percent by number and 9.7 percent by dollar volume of bank-wide community development loans. The performance represents a significant increase, more than doubling, from the last evaluation. Regarding the community development purpose, a majority of the loans supported revitalization and stabilization of low- and moderate-income geographies, followed by affordable housing and economic development.

The following are notable examples of the bank's community development loans in the assessment area.

- In 2020, the bank originated a loan for \$803,000 to a small business in a moderate-income census tract in the assessment area. The loan funded the purchase of a crop duster used to apply fertilizer to local farms. There are limited providers of this service in the area and the loan

proceeds allowed small farms to operate in the area.

- In 2020, the bank originated a loan for \$400,000 to acquire a 16-unit apartment building in a low-income census tract to provide affordable housing targeted to low- and moderate-income individuals.

The table on the following page reflects the bank’s community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2/5/2019-12/31/2019	3	409	0	0	0	0	0	0	3	409
2020	1	389	0	0	1	490	3	2,464	5	3,343
1/1/2021-11/15/2021	0	0	0	0	0	0	6	126	6	126
Totals	4	798	0	0	1	490	9	2,590	14	3,878

Source: Bank Records

Qualified Investments

During the evaluation period, First Bank made one qualified investment (donation) of \$1,000. The investment was a donation in 2020 to an organization that supported community development activities in the assessment area. The organization provided community services to low- and moderate-income individuals by providing substance abuse treatment, mental health counseling, mentoring, and vocational skills training to low- and moderate-income individuals.

Community Development Services

First Bank provided two instances of qualified services benefiting one organization within the assessment area. This represents 1.4 percent by number volume of the bank-wide community development services. In 2020 and 2021, one employee served as president of an organization in the assessment area that provides educational scholarships to low-income students.

NAPLES MSA ASSESSMENT AREA – Limited-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NAPLES MSA ASSESSMENT AREA

Naples MSA assessment area consists of portions Collier County. The bank operates one full-service branch in this assessment area, representing 14.3 percent of total offices. The branch offers a drive-through facility and a depository ATM. The branch is located in a moderate-income census tract. This assessment area accounts for 5.2 percent of total loans and 8.2 percent of total deposits.

Economic and Demographic Data

Naples MSA assessment area consists of six census tracts, four low-, one moderate-, and one upper-income census tracts. Of the housing units within the assessment area, 45.7 percent were owner-occupied units, 28.7 percent were rental units, and 25.6 percent were vacant units. The following

table presents select demographic, housing, and economic information for the assessment area from the 2015 ACS Census data and the 2020 D&B data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	66.7	16.7	0.0	16.7	0.0
Population by Geography	48,170	42.6	9.9	0.0	47.5	0.0
Housing Units by Geography	14,747	37.1	7.7	0.0	55.2	0.0
Owner-Occupied Units by Geography	6,737	25.0	6.0	0.0	69.0	0.0
Occupied Rental Units by Geography	4,237	60.0	10.1	0.0	29.9	0.0
Vacant Units by Geography	3,773	33.2	7.8	0.0	59.0	0.0
Businesses by Geography	4,154	13.3	10.0	0.0	76.7	0.0
Farms by Geography	244	24.6	22.5	0.0	52.9	0.0
Family Distribution by Income Level	9,057	33.5	16.0	17.7	32.7	0.0
Household Distribution by Income Level	10,974	31.3	14.2	18.2	36.2	0.0
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA		\$66,264	Median Housing Value			\$144,502
			Median Gross Rent			\$875
			Families Below Poverty Level			19.5%
<i>Source: 2015 ACS Census Data and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the 2020 D&B data, there were 4,154 businesses in the assessment area. The GARs for these businesses were as follows: 94.0 percent had \$1.0 million or less, 1.7 percent had more than \$1.0 million, and 4.3 percent had unknown revenues. According to the 2020 D&B data, there were 244 farms in the assessment area. The following reflects GARs for these farms: 91.4 percent had \$1.0 million or less, 5.7 percent had more than \$1.0 million, and 2.9 percent has unknown revenues. The largest sector of businesses in the area include leisure and hospitality, education and health, retail trade, professional and business, and government. Major employers in the area include Naples Community Hospital, Inc.; Publix Super Markets, Inc.; Arthrex, Inc.; Walmart; and the Ritz-Carlton Hotel CO., LLC.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NAPLES MSA ASSESSMENT AREA

LENDING TEST

First Bank's lending performance within the Naples MSA assessment area is consistent with the institution's lending performance in the assessment areas within the MSA and nonmetropolitan portions of the state that were reviewed using full-scope examination procedures.

For 2019 and 2020, the bank originated eight home mortgage loans inside the assessment area totaling approximately \$874,000, 17 small business loans totaling approximately \$2.2 million, and three small farm loans totaling \$540,000. Tables demonstrating the bank's geographic and borrower distribution performance are in Appendix C.

COMMUNITY DEVELOPMENT TEST

First Bank's community development lending performance in the Naples MSA assessment area is consistent with the institution's community development performance in the assessment areas within the MSA and nonmetropolitan portions of the state that were examined using full-scope procedures.

During the review period, the bank originated nine community development loans totaling \$5.9 million within the assessment area, made three qualified investments (donations) totaling \$12,000, and engaged in six instances of activities to revitalize or stabilize low- or moderate-income geographies or distressed or underserved geographies and five instances of community services activities.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

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

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

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

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

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

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

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

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

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

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

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

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

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

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

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

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

**NAPLES MSA ASSESSMENT AREA
LENDING PERFORMANCE TABLES (Appendix C)**

Geographic Distribution

Home Mortgage Loans

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	25.0	5.0	2	66.7	89	41.0
2020	25.0	3.6	2	40.0	257	39.1
Moderate						
2019	6.0	0.5	1	33.3	128	59.0
2020	6.0	0.5	2	40.0	190	28.9
Upper						
2019	69.0	94.6	0	0.0	0	0.0
2020	69.0	95.8	1	20.0	210	32.0
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Totals						
2019	100.0	100.0	3	100.0	217	100.0
2020	100.0	100.0	5	100.0	657	100.0
<small>Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</small>						

Small Business Loans

Geographic Distribution of Small Business Loans						
Tract Income Level		% of Businesses	#	%	\$(000s)	%
Low						
	2019	13.6	5	55.6	796	54.2
	2020	13.3	2	25.0	223	29.0
Moderate						
	2019	10.2	4	44.4	672	45.8
	2020	10.0	6	75.0	549	71.0
Upper						
	2019	76.2	0	0.0	0	0.0
	2020	76.7	0	0.0	0	0.0
Total						
	2019	100.0	9	100.0	1,468	100.0
	2020	100.0	8	100.0	772	100.0
<i>Source: 2019 and 2020 D&B Data; and Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>						

Small Farm Loans

Geographic Distribution of Small Farm Loans						
Tract Income Level		% of Farms	#	%	\$(000s)	%
Low						
	2019	23.7	0	0.0	0	0.0
	2020	24.6	0	0.0	0	0.0
Moderate						
	2019	23.7	0.0	0	0	0.0
	2020	22.5	1	33.3	390	72.2
Upper						
	2019	56.2	0	0.0	0	0.0
	2020	52.9	2	66.7	150	27.8
Total						
	2019	100.0	0	100.0	0	100.0
	2020	100.0	3	100.0	540	100.0
<i>Source: 2019 and 2020 D&B Data; and Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>						

Borrower Profile

Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	33.5	4.0	0	0.0	0	0.0
2020	33.5	3.5	0	0.0	0	0.0
Moderate						
2019	16.0	20.0	2	66.7	89	41.0
2020	16.0	21.4	1	20.0	110	16.7
Middle						
2019	17.7	26.5	0	0.0	0	0.0
2020	17.7	23.9	2	40.0	338	51.4
Upper						
2019	32.7	29.8	0	0.0	0	0.0
2020	32.7	30.2	1	20.0	130	19.7
Not Available						
2019	0.0	19.7	1	33.3	128	59.0
2020	0.0	21.0	1	20.0	80	12.2
Totals						
2019	100.0	100.0	3	100.0	217	100.0
2020	100.0	100.0	5	100.0	657	100.0
<i>Source: 2015 ACS Census Data; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	93.1	4	44.4	93	6.3
2020	94.0	3	37.5	462	59.8
>\$1,000,000					
2019	2.1	3	33.3	647	44.1
2020	1.7	4	50.0	288	37.3
Revenue Not Available					
2019	4.8	2	22.2	728	49.6
2020	4.3	1	12.5	22	2.9
Totals					
2019	100.0	9	100.0	1,468	100.0
2020	100.0	8	100.0	772	0.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Small Farm Loans

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000					
2019	90.7	0	0.0	0	0.0
2020	91.4	2	66.7	150	27.8
> \$1,000,000					
2019	5.9	0	0.0	0	0.0
2020	5.7	1	33.3	390	72.2
Revenue Not Available					
2019	3.4	0	0.0	0	0.0
2020	2.9	0	0.0	0	0.0
Total					
2019	100.0	0	100.0	0	100.0
2020	100.0	3	100.0	540	100.0
<i>Source: 2019 and 2020 D&B Data and Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>					

OPERATING BRANCHES 2024

Branch	Street Address	County Name	State Code	County Code	MSA/MD	Census Tract	Underserved or Distressed	Census Tract Income
Main Office	300 East Sugarland Hwy Clewiston, FL 33440	Hendry	12	51	NA	0001.02	Yes	Middle
Berner Road	101 South Berner Road Clewiston, FL 33440	Hendry	12	51	NA	0001.01	Yes	Middle
Labelle	301 State Road 80 Labelle, FL 33935	Hendry	12	51	NA	0004.03	No	Moderate
Fort Myers	11741 Palm Beach Blvd. Suite 100 Ft. Myers, FL 33905	Lee	12	71	15980 / Cape Coral-Fort Myers	0302.01	No	Upper
Moore Haven	24704 North Hwy 27 Moore Haven, FL 33471	Glades	12	43	NA	0003.00	No	Middle
Belle Glade	325 S. Main Street Belle Glade, FL 33430	Palm Beach	12	99	48424 / West Palm Beach-Boca Raton-Boynton Beach	0082.03	No	Low
Immokalee	316 North 15th Street Suite 1 Immokalee, FL 34142	Collier	12	21	34940/ Naples- Marco Island	0114.00	No	Low

BRANCHES RECENTLY OPENED

None N/A

BRANCHES RECENTLY CLOSED

None N/A

ASSESSMENT AREAS 2024

County	Tract or Block Area	Income Level	Poverty Unemployment	Underserved or Distressed Tract
Palm Beach	0081.01	Moderate		
Palm Beach	0081.02	Unknown		
Palm Beach	0082.01	Moderate		
Palm Beach	0082.02	Low		
Palm Beach	0082.03	Low		
Palm Beach	0083.01	Unknown		
Palm Beach	0083.02	Moderate		
Hendry	0001.01	Middle	Yes	Yes
Hendry	0001.02	Middle	Yes	Yes
Hendry	0002.00	Middle	Yes	Yes
Hendry	0003.00	Moderate		
Hendry	0004.01	Middle	Yes	Yes
Hendry	0004.03	Moderate		
Hendry	0004.04	Moderate		
Hendry	0006.01	Unknown		
Hendry	0006.02	Middle	Yes	Yes
Hendry	9900.00	Unknown		
Glades	0001.00	Moderate		
Glades	0002.01	Moderate		
Glades	0002.02	Middle		
Glades	0003.00	Middle		
Glades	9900.00	Unknown		
Collier	0112.06	Moderate		
Collier	0112.08	Middle		
Collier	0112.10	Middle		
Collier	0112.11	Middle		
Collier	0112.12	Upper		
Collier	0112.14	Moderate		
Collier	0112.04	Low		
Collier	0112.05	Low		
Collier	0113.03	Low		
Collier	0113.04	Moderate		
Collier	0113.05	Low		
Collier	0113.06	Low		
Collier	0114.00	Low		
Lee	0003.03	Moderate		
Lee	0003.04	Upper		
Lee	0003.05	Moderate		
Lee	0003.06	Low		
Lee	0004.01	Moderate		
Lee	0004.02	Middle		
Lee	0005.03	Moderate		
Lee	0005.04	Moderate		

County	Tract or Block Area	Income Level	Poverty Unemployment	Underserved or Distressed Tract
Lee	0202.01	Middle		
Lee	0202.02	Upper		
Lee	0203.01	Moderate		
Lee	0203.02	Moderate		
Lee	0204.00	Upper		
Lee	0205.01	Moderate		
Lee	0205.02	Middle		
Lee	0301.00	Middle		
Lee	0302.01	Upper		
Lee	0302.02	Moderate		
Lee	0302.05	Middle		
Lee	0303.00	Upper		
Lee	0401.21	Moderate		
Lee	0401.23	Upper		
Lee	0401.24	Middle		
Lee	0401.27	Middle		
Lee	0402.05	Moderate		
Lee	0402.06	Middle		
Lee	0402.08	Moderate		
Lee	0402.09	Middle		
Lee	0402.10	Moderate		

PRODUCTS & SERVICES

CONSUMER LOANS	
• Unsecured	• Credit Cards
• Unimproved and Improved Vacant Land	• Ready Reserve
• Auto, Boat, RV	• HELOC
• Cash Secured	• Consumer Online Loan Applications
• Quilo (Consumer Unsecured Loan Applications)	

COMMERCIAL LOANS	
• Construction and Land Development – Commercial RE	• Cash Secured
• Farm Land	• Letters of Credit
• Non-Farm Non-Residential	• Multi Family Complex
• Equipment, Inventory, Accounts Receivable, Heavy Equipment, Fixed Assets	• SBA, USDA, FHLB guaranty Loan Programs
• Lines of Credit, Dealer Floor Plan Lines	• Unsecured Single Family
• Credit Cards	

LOANS TO POLITICAL ENTITIES	
• Utilities	• Schools
• Water	• County Fire and Rescue Service
• Hospitals	

RESIDENTIAL REAL ESTATE	
• Construction and Land Development - Residential RE	• Home Equity Loans
• Conventional – Fixed (FNMA, VA, FHA)	• USDA, FHLB, Florida Hardest Hit Lending Assistance Programs

- | | |
|---|---|
| <ul style="list-style-type: none"> • Adjustable Rate | <ul style="list-style-type: none"> • Unimproved and Improved Vacant Land |
|---|---|

PERSONAL RETAIL BANKING SERVICES

- | | |
|---|--|
| <ul style="list-style-type: none"> • Kasasa Cash Checking | <ul style="list-style-type: none"> • Individual Retirement Accounts |
| <ul style="list-style-type: none"> • Kasasa Cash Back Checking | <ul style="list-style-type: none"> • Personal Online Banking |
| <ul style="list-style-type: none"> • First1Interest Checking | <ul style="list-style-type: none"> • Telephone Banking |
| <ul style="list-style-type: none"> • InControl Checking | <ul style="list-style-type: none"> • Overdraft Privilege |
| <ul style="list-style-type: none"> • Kasasa Saver | <ul style="list-style-type: none"> • Wire Transfers |
| <ul style="list-style-type: none"> • First1Savings | <ul style="list-style-type: none"> • Safe Deposit Boxes |
| <ul style="list-style-type: none"> • Money Market | <ul style="list-style-type: none"> • Account Sweeps |
| <ul style="list-style-type: none"> • Certificates of Deposit | |

BUSINESS BANKING SERVICES

- | | |
|---|---|
| <ul style="list-style-type: none"> • Business Checking | <ul style="list-style-type: none"> • Remote Deposit |
| <ul style="list-style-type: none"> • First1Business Savings | <ul style="list-style-type: none"> • Account Sweeps |
| <ul style="list-style-type: none"> • Money Market | <ul style="list-style-type: none"> • ACH Origination & Payroll |
| <ul style="list-style-type: none"> • Certificates of Deposit | <ul style="list-style-type: none"> • Merchant Services |
| <ul style="list-style-type: none"> • Business Online Banking | <ul style="list-style-type: none"> • Wire Transfers |

ONLINE SERVICES

- | | |
|---|---|
| <ul style="list-style-type: none"> • Online Banking & Bill Pay | <ul style="list-style-type: none"> • Voice/Telephone Banking |
| <ul style="list-style-type: none"> • Mobile Banking | <ul style="list-style-type: none"> • P2P Transfers |
| <ul style="list-style-type: none"> • eStatements | <ul style="list-style-type: none"> • Merchant Capture/Remote Deposit |
| <ul style="list-style-type: none"> • Online Security | <ul style="list-style-type: none"> • ZIP for loan inquires |
| <ul style="list-style-type: none"> • First1Bank Mobile Deposit | <ul style="list-style-type: none"> • Online account opening |
| <ul style="list-style-type: none"> • Bank to Bank Transfer | |

OTHER SERVICES

- | | |
|--|--|
| <ul style="list-style-type: none"> • ATM | <ul style="list-style-type: none"> • ATM + Live (ITM) |
| <ul style="list-style-type: none"> • Night Depository | |



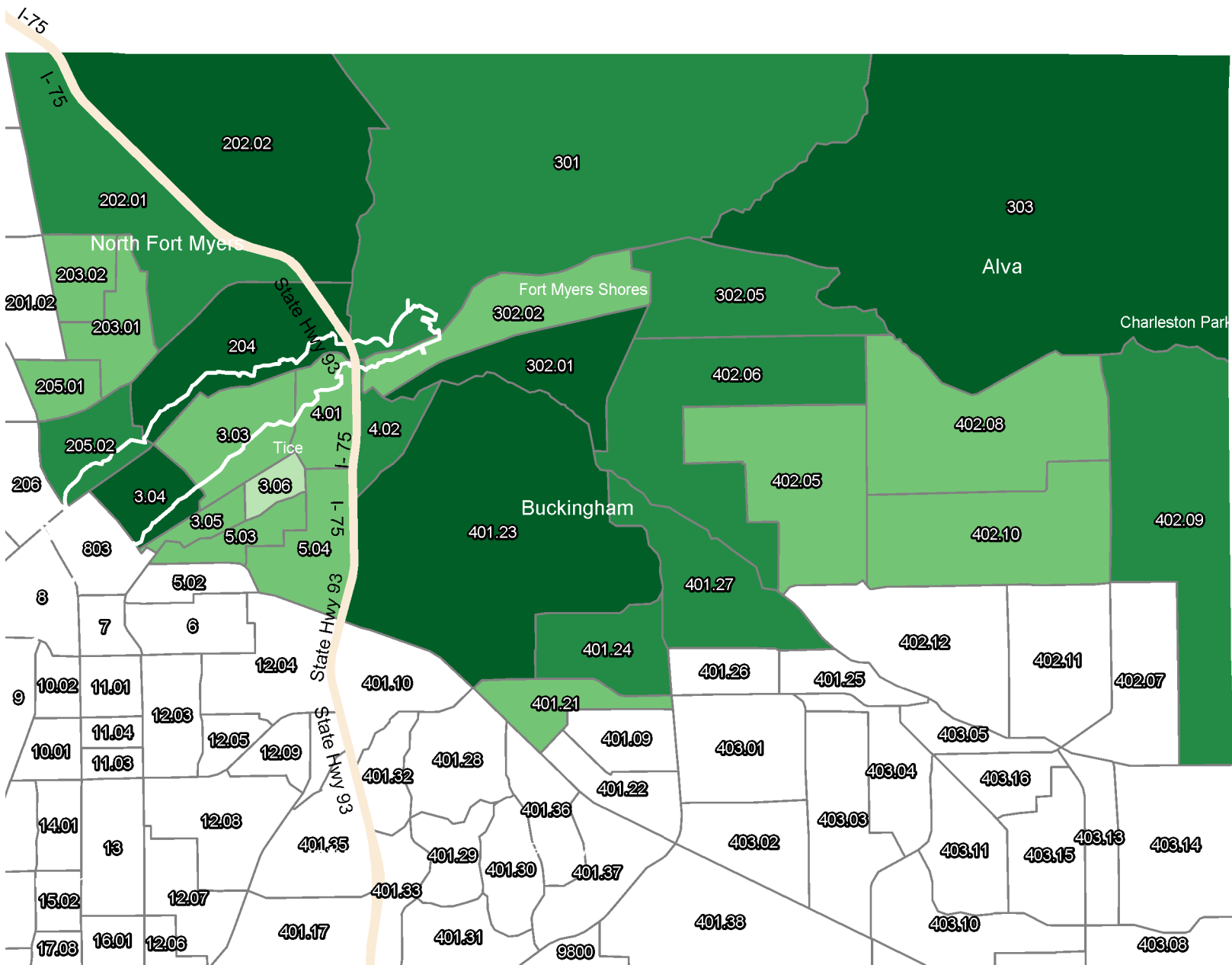
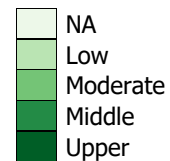
First Bank Standard Fees Schedule

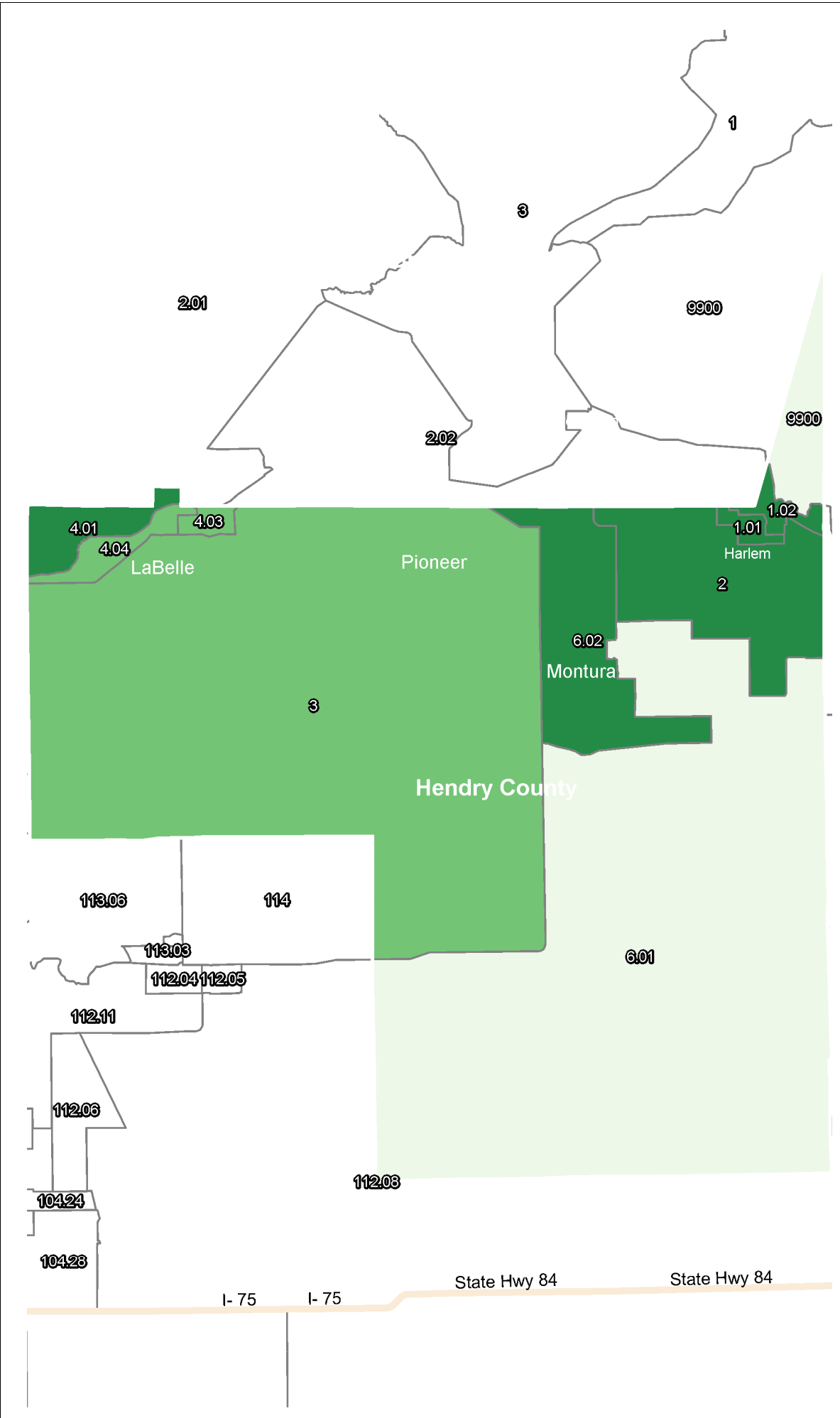
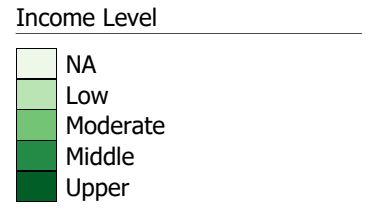
Fees Effective 6/1/2021

Automated Teller Machines (ATM)	
Balance Inquiries (any ATM)	FREE
Non Customer Withdrawals	\$2.50
Transfers	FREE
Withdrawals At First Bank ATMs	FREE
Shazam Check Debit Cards (Master Card Debit Card)	
Replacement Debit Card	\$5.00
Person-to-Person (P2P)	\$2 per outgoing transaction
E- Banking Services	
First1Online Banking & Bill Pay	FREE
First1Mobile Banking & Bill Pay	FREE
Stop Payment - Billpay	\$30.00
Wire Transfer Services	
Incoming - Domestic	FREE
Incoming - International	FREE
Outgoing - Domestic	\$15.00
Outgoing - International	\$45.00
Chargeback Items	
Chargeback Items - Business	\$6.00
Chargeback Items - Redeposit	FREE
Accounts - Miscellaneous	
Dormant Service Charge	\$5.00/month
Research: Per Hour - Min. One Hour	\$25.00
Research: Photocopy Per Page	\$1.00
Statement Printout	\$5.00
Temporary Checks - 4 Checks	\$1.00
Temporary Deposit Slips	FREE
Transfers	FREE
Automatic Transfer (To Cover Overdraft)	\$2.00
Savings - Excess Debit Fee for each withdrawal/debit over 3 per month	\$4.00
Returned Mail Undeliverable, per month	\$5.00
Stop Payment Order	\$30.00

Overdraft Charges	
<i>An overdraft item or returned item may be created by check, in person withdrawal, ATM withdrawal, Debit Card purchase or other electronic means.</i>	
Overdraft Item Fee - Item is paid.	\$30.00
Returned Item Fee - Item is returned unpaid.	\$30.00
Miscellaneous	
Check Collection - Customers	\$15.00
Foreign Currency Exchange	\$50.00
Fax - Per Page	\$2.00
Fax - Per Page (Non Customers)	\$4.00
IRS Levy, State Levy, or Writ of Garnishment	\$100.00
Loans - Payoff Letters	\$25.00
Notary Public - Customers	FREE
Cashiers Check - Customers	\$5.00
Currency and Coin	
Coin counting and sorting	3%
Currency Withdrawals may be limited to \$25,000 without 48 hours advance notice and subject to a currency handling fee	0.3%
Night Depository	
Zipper Bags	\$1.00
Zipper Bags - With Lock	\$25.00
Safe Deposit Boxes	
2x5 inches	\$25.00
3x5 inches	\$30.00
4x5 inches	\$35.00
5x5 inches	\$40.00
3x10 inches	\$45.00
4x10 inches	\$50.00
5x10 inches	\$55.00
10x10 inches	\$75.00
Key Deposit	\$20.00
Lost Key	Forfeit Deposit
Drill Box	Current Rate

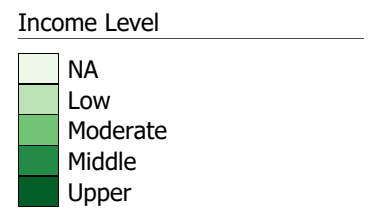
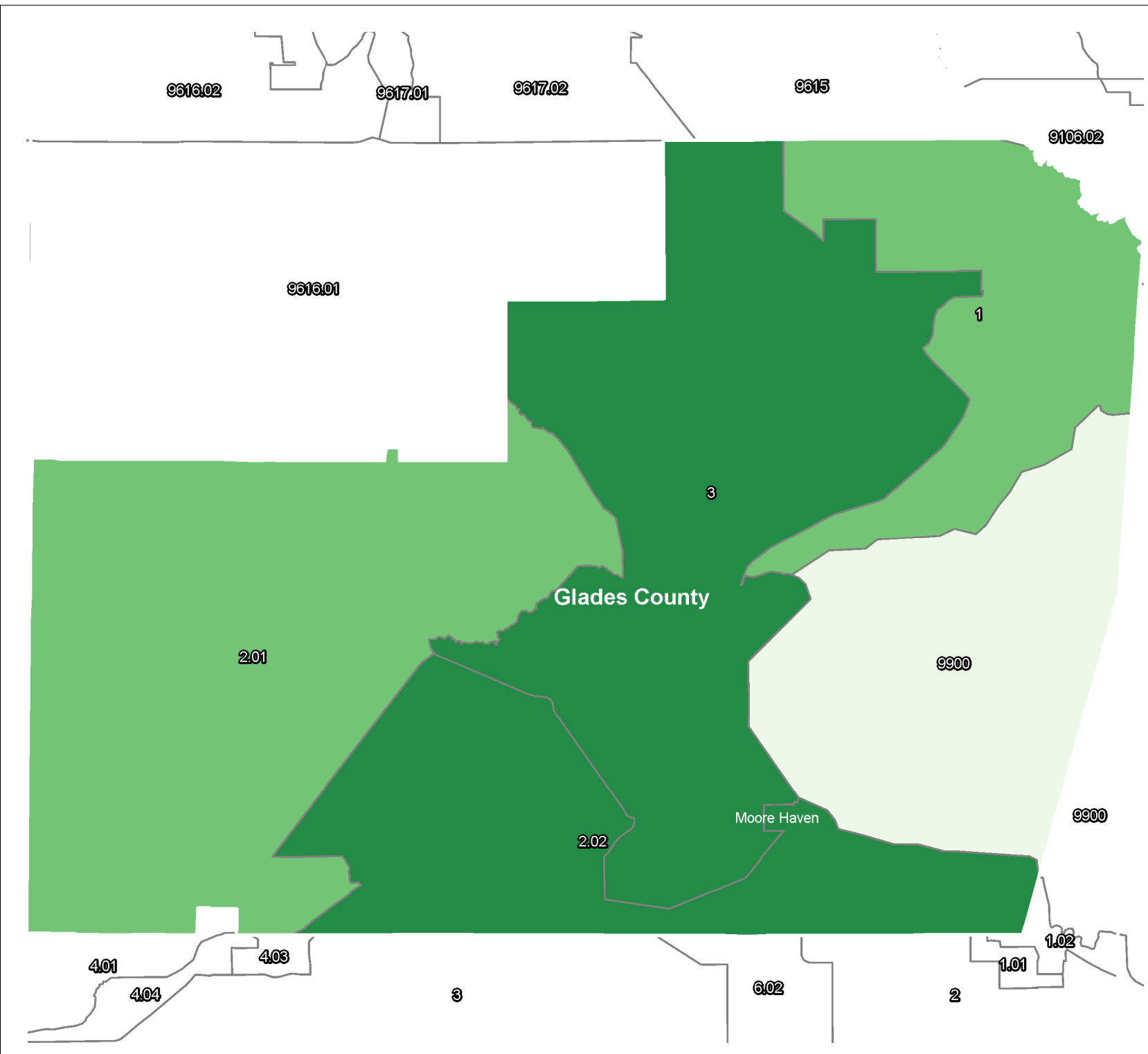
Income Level





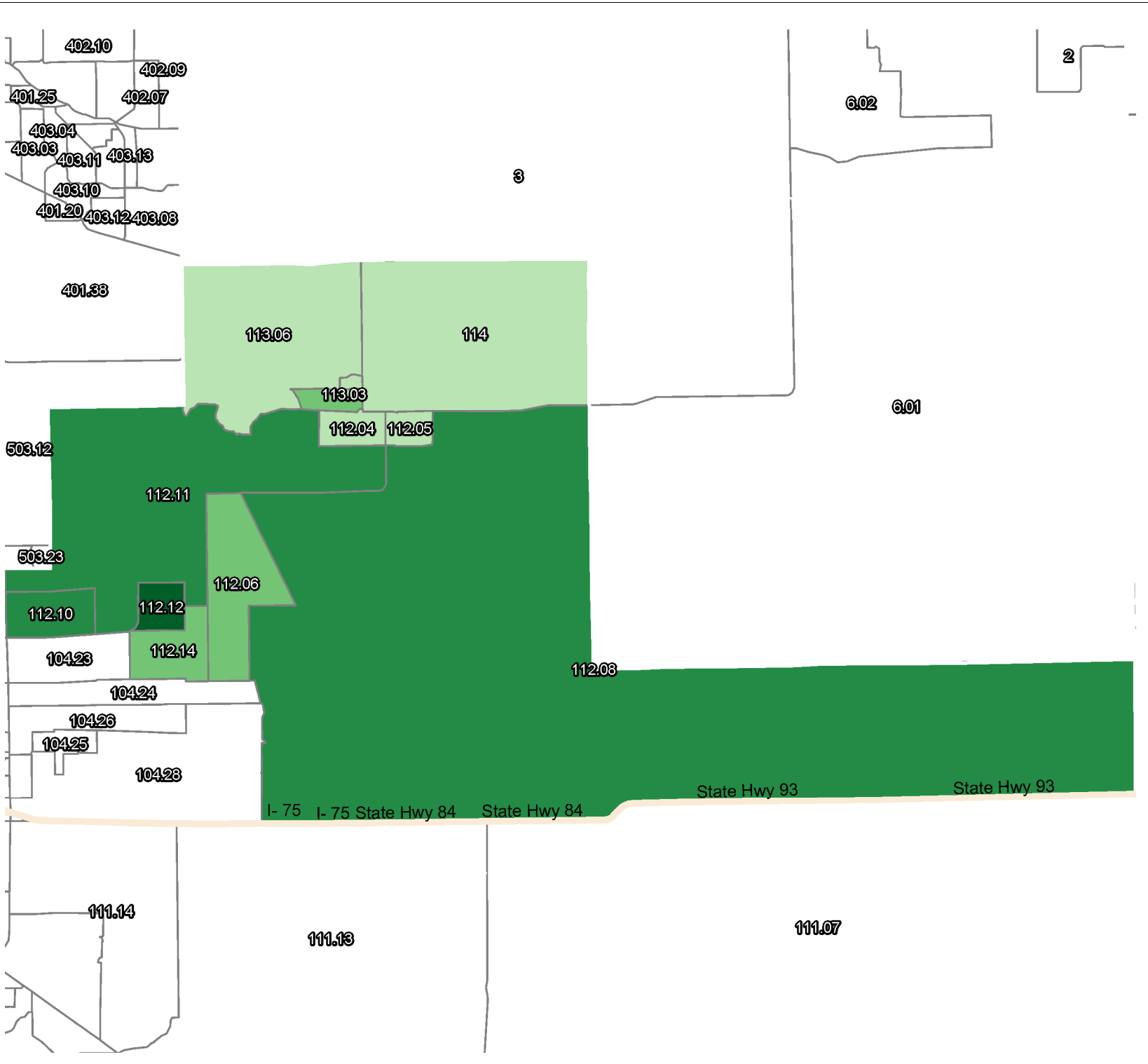
FIRST BANK - 2024 HMDA - ASSESSMENT AREA INCOME MAP

FL Non MSA Glades



FIRST BANK - 2024 HMDA - ASSESSMENT AREA INCOME MAP

Naples MSA

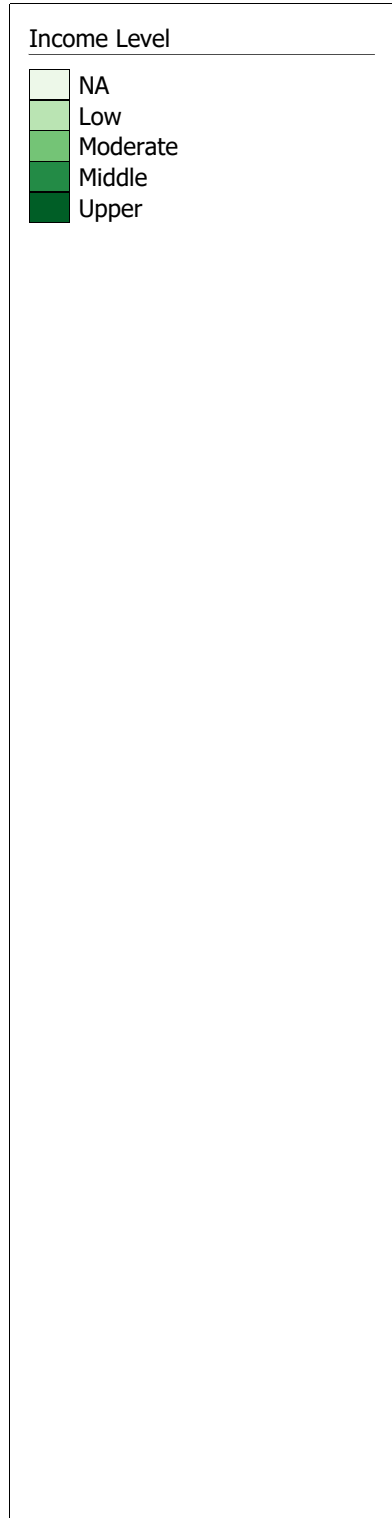
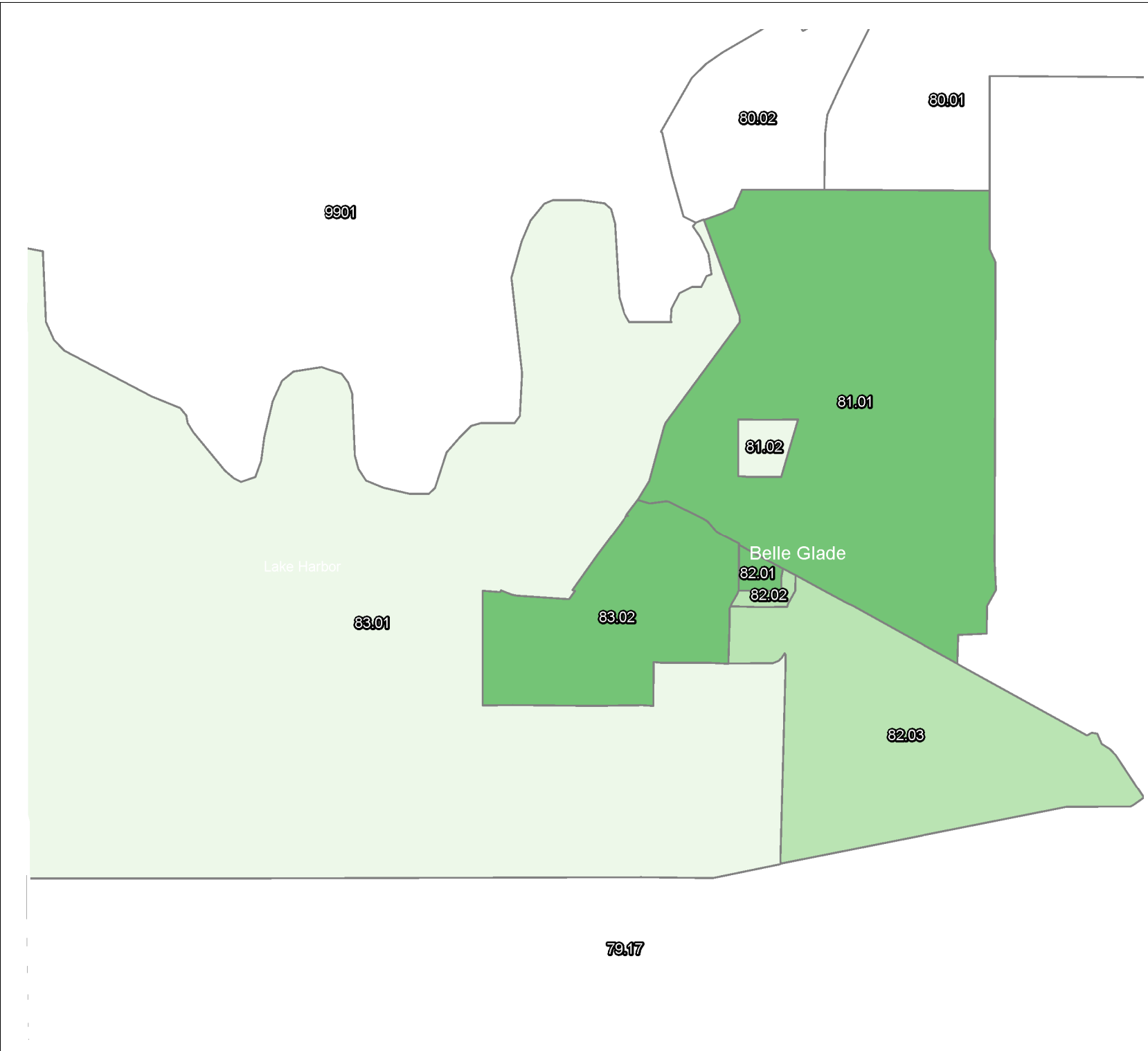


Income Level

- NA
- Low
- Moderate
- Middle
- Upper

FIRST BANK - 2024 HMDA - ASSESSMENT AREA INCOME MAP

West Palm Beach MD Palm Beach



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. HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda).

LOAN TO DEPOSIT RATIOS

Loan-to-Deposit Ratios for Calendar Year 2023

First Bank's loan-to-deposit ratio for each quarter of the prior calendar year are as follows:

Q1 2023	Q2 2023	Q3 2023	Q4 2023
59.17%	58.21%	64.40%	65.24%