



With locations in  
Cameron, Bastrop, Giddings, Liberty Hill,  
Rockdale, and Rosebud

# **Community Reinvestment Act (CRA) Public File**

Classic Bank, N.A. will maintain a copy of this file for public inspection upon request and at no cost at its main office 102 N Houston, Cameron, TX 76520. Classic Bank, N.A. will also maintain a copy of its most recent CRA Performance Evaluation and a list of services provided at each branch office. Classic Bank, N.A. 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.

**Classic Bank, N.A.**

**Written Comments from the Public (2022 – 2023)**

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

**Classic Bank, N.A.  
102 N. Houston  
PO Box 835  
Cameron, TX 76520**

**There have been no such comments.**

**Classic Bank, N.A. did not receive any written comments from the public during the two calendar years from 2022 – 2023.**

**Classic Bank, N.A.**

**CRA Performance Evaluation**

Classic Bank, N.A.'s most recent CRA Performance Evaluation completed on July 6, 2021 by The Office of the Comptroller of the Currency (OCC), is attached after this page. Classic Bank, N.A. received a rating of Satisfactory. If you have any questions regarding this performance evaluation, please contact us at:

Classic Bank, N.A.  
102 N Houston  
PO Box 835  
Cameron, TX 76520



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

July 06, 2021

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Classic Bank, National Association  
Charter Number 13731

102 N. Houston  
Cameron, TX 76520

Office of the Comptroller of the Currency  
Southern District  
San Antonio Field Office  
10001 Reunion Place, Suite 250  
San Antonio, TX 78216

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not 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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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are inside its AAs.
- The bank exhibits reasonable geographic distribution of home mortgage, small loans to businesses, and small loans to farms.
- The bank exhibits excellent distribution of small loans to farms and small loans to businesses.
- The bank exhibits reasonable responsiveness to CD needs, considering the bank's capacity and the need and availability of CD opportunities in the AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is more than reasonable.

The bank's quarterly average LTD ratio calculated on a bank-wide basis for the 12-quarter evaluation period was 86.3 percent. Over the same timeframe, the LTD ratio ranged from a low of 77.4 percent to a high of 92.5 percent. The bank's average quarterly ratio has improved from the 75 percent reported during the prior evaluation period.

The bank's average LTD ratio ranked the third highest of 10 similarly situated institutions with total assets ranging from \$40 to \$853 million. The overall average LTD of the bank's peer group is 63.2 percent, with an average low of 28.7 percent to a high of 90.1 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 67 percent of its total loans by number and 55 percent by dollar volume inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Classic Bank, NA Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	

Home Mortgage	287	71	116	29	403	57,381	59	39,371	41	96,752
Small Business	31	52	29	48	60	4,078	24	12,956	76	17,035
Small Farm	33	55	27	45.0	60	10,958	62	6,824	38	17,781
<b>Total</b>	<b>351</b>	<b>67</b>	<b>172</b>	<b>33</b>	<b>523</b>	<b>72,417</b>	<b>55</b>	<b>59,151</b>	<b>45</b>	<b>131,568</b>

Source: Bank Data; 2018, 2019 and 2020 HMDA, small business, and small farm loan sample. Due to rounding, totals may not equal 100.0%

## Description of Institution

Classic Bank, National Association (Classic) is an intrastate bank chartered in 1889, and headquartered in Cameron, Texas. Cameron Financial Corporation, a single-bank holding company, owns 100 percent of the bank. Classic has a total of six full-service locations, each offering automated teller machines (ATMs) and drive-through banking services. Assets totaled approximately \$528 million as of June 30, 2021.

Classic's main office, headquartered in Cameron, Texas, is located 75 miles northeast of Austin, Texas with a standalone drive-through facility located a few blocks from the main office. In addition to the main office, the bank has a network of five branches in the cities of Bastrop (Bastrop County), Giddings (Lee County), Liberty Hill (Williamson County), Rockdale (Milam County), and Rosebud, Texas (Falls County). The bank also operates a total of six ATMs with 24-hour access. The Rosebud branch was relocated during the evaluation period but remains in the same zip code and census tract (CT) as the original location. Alternative delivery channels include 24 hour "Bank-By-Phone," online banking with bill pay and mobile banking with mobile-remote check deposit, online loan application acceptance, and four ATMs with deposit-taking capabilities in the cities of Cameron, Rosebud, Rockdale, and Giddings.

Classic is a full-service lender offering traditional and digital banking products and services. This includes long-term fixed rate residential mortgages, small business and agricultural loans, and free reward and cash-back checking account products. Classic also offers its "SafeLink" checking account that has no minimum balance requirement, no overdraft privileges, but does have a monthly service charge. Customers with a SafeLink account are not subject to overdraft or insufficient funds fees and are eligible to apply for a small personal unsecured line of credit up to \$1,000 with no credit check. Classic charges interest on this small consumer loan product, which was 14.95 percent as of this evaluation.

At December 31, 2020, Classic reported \$390 million in total deposits and \$364.7 million in total loans.

Loan Type	\$ (000s)	% of Total Loan Portfolio
Commercial Loans	\$ 140,281	38.47
Residential Loans	\$ 108,295	29.70
Farmland Loans	\$ 68,370	18.75
Agriculture Production	\$ 39,587	10.85
Consumer Loans	\$ 8,027	2.20
Other	\$ 124	0.03
<b>Total</b>	<b>\$ 364,684</b>	<b>100.00</b>

There is significant competition from other financial institutions, particularly among the AAs within metropolitan statistical areas. The June 30, 2021 Federal Deposit Insurance Corporation data showed that the bank had a total deposit market share of 3.1 percent across all counties with a full-service branch, or

across all three AAs. This represents the 11<sup>th</sup> largest share across 42 institutions within the five counties in which the bank operates.

In response to the Coronavirus Aid, Relief, and Economic Security Act or CARES Act established in 2020, Classic participated in the Small Business Administrations' Paycheck Protection Program (PPP). These loans were designed to provide a direct incentive for small businesses to keep their workers on payroll during the COVID pandemic. The bank originated 188 PPP loans totaling \$11.2 million in 2020. Although outside of the evaluation period, we should note that the bank originated another 681 PPP loans totaling \$10.8 million in 2021.

Based on the financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit Classics ability to help meet credit needs in its AAs. The prior performance evaluation dated June 12, 2018, assigned an overall "Satisfactory" rating to Classics CRA performance.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This performance evaluation assesses the bank's CRA performance under the intermediate small bank (ISB) procedures, which includes a lending test and a CD test. The lending test evaluates the bank's record of meeting the credit needs of its AAs through its primary lending products in home mortgage, small loans to businesses, and farmland and agricultural production lending. The CD test evaluates the bank's responsiveness to CD needs in its AAs through CD lending, qualified investments, and services.

The evaluation period for both the Lending and CD Test was from January 1, 2018 through December 31, 2020.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

For analytical purposes, Classic has three AAs. We combined Bastrop County and Williamson County into the Bastrop and Williamson Counties AA because both counties are in the Austin-Round Rock-Georgetown MSA. The AA includes all census tracts in each county. We combined Lee County and Milam County into the Lee and Milam Counties AA because these counties are adjacent and not included in an MSA. The Falls County AA includes three census tracts; Falls County is part of the Waco MSA. We performed full-scope reviews for the Bastrop and Williamson Counties AA and the Lee and Milam Counties AA and a limited scope review for the Falls County AA. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.



## **Ratings**

The bank's overall rating is based on performance in the State of Texas. The state rating is based on performance in all bank AAs with the most weight placed on performance in the full-scope review AAs. We placed more weight on the bank's home mortgage and small business activities as Classic originated a significant number and dollar volume of these loans during the evaluation period. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Texas

**CRA rating for the State of Texas:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The bank's LTD ratio is more than reasonable.
- A majority of the bank's loans are inside its AAs.
- The bank exhibits reasonable geographic distribution of home mortgage, small loans to businesses, and small loans to farms.
- The bank exhibits excellent distribution of small loans to farms and small loans to businesses. The bank exhibits reasonable responsiveness to CD needs, considering the bank's capacity and the need and availability of CD opportunities in the AAs

### Description of Institution's Operations in Texas

Classic operates six banking centers which includes a network of five branches as well as the main office in the state of Texas. Classic's AAs include five counties, with each AA containing at least one branch. Milam County contains two locations, including one branch and the main office. While most AAs consisted of whole counties, the Falls County AA consisted of three census tracts, none of which were low or moderate income. We completed full-scope reviews of the Bastrop and Williamson Counties AA and the Lee and Milam Counties AA. We performed a limited-scope review of the Falls County AA.

### Bastrop and Williamson Counties AA

The following table show pertinent demographic information about the AA.

Demographic Information of the Bastrop and Williamson Counties Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	99	2.0	18.2	51.5	28.3	0.0
Population by Geography	550,540	1.0	16.0	54.1	28.9	0.0
Housing Units by Geography	201,635	1.0	17.2	54.7	27.1	0.0
Owner-Occupied Units by Geography	130,669	0.6	11.8	55.6	32.0	0.0
Occupied Rental Units by Geography	56,578	1.7	27.7	52.8	17.8	0.0
Vacant Units by Geography	14,388	1.5	24.1	54.5	19.8	0.0
Businesses by Geography	62,299	1.2	12.7	57.6	28.5	0.0
Farms by Geography	1,566	0.9	15.1	62.1	22.0	0.0
Family Distribution by Income Level	135,735	17.7	17.6	22.5	42.2	0.0

Household Distribution by Income Level	187,247	18.2	16.0	19.3	46.6	0.0
Median Family Income MSA - TX		\$78,997	Median Housing Value			\$187,560
			Median Gross Rent			\$1,053
			Families Below Poverty Level			6.0%
Source: 2015 ACS 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.						

The AA includes all of Bastrop and Williamson counties census tracts. We combined the counties for analytical purposes as both are part of the Austin-Round Rock-Georgetown MSA. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies. Classic operates one branch and ATM in each county in the AA. This AA consists of 99 CTs with a total population of 550,540. Approximately 20.2 percent of the AAs CTs are low to moderate income, with the majority of the AA living in a middle-income CT. Approximately 18.4 percent of loan originations between 2018 and 2020 were made within this AA.

The average median family income in the AA was approximately \$79 thousand; six percent of the families within the AA were considered below poverty. The U.S. Bureau of Labor Statistics identified unemployment rates ranging from 4.7 percent to 5.1 percent across the two counties within the AA as of December 31, 2020. Both county rates compare favorably to the 6.9 percent reported for the state of Texas and the national rate of 6.7 percent. Major employment industries in the AA include the local school district, hospitality and leisure, and healthcare facilities.

Classic faces strong competition from other local, regional, and national banks within this AA due to its location within the Austin-Round Rock-Georgetown MSA. The FDIC Deposit Market Share Report showed Classic with \$48.7 million in deposits within the AA or just 0.44 percent of the market share. Classic ranked 28<sup>th</sup> out of 37 institutions in the market which was dominated by large banks with a nationwide presence.

To help identify needs and opportunities in the AA we reviewed three recent regulatory agency contacts and found primary needs included small business lending, small business financial education and affordable housing.

## Lee and Milam Counties AA

The following table shows pertinent demographic information about the AA.

Demographic Information of the Lee and Milam Counties Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	9.1	54.5	36.4	0.0
Population by Geography	41,008	0.0	8.0	58.6	33.4	0.0
Housing Units by Geography	18,893	0.0	8.5	56.9	34.6	0.0
Owner-Occupied Units by Geography	10,620	0.0	7.0	55.2	37.9	0.0
Occupied Rental Units by Geography	4,722	0.0	10.9	61.5	27.6	0.0

Vacant Units by Geography	3,551	0.0	9.8	56.2	34.0	0.0
Businesses by Geography	2,739	0.0	10.4	58.9	30.7	0.0
Farms by Geography	227	0.0	5.3	55.9	38.8	0.0
Family Distribution by Income Level	10,303	18.5	16.5	19.1	45.9	0.0
Household Distribution by Income Level	15,342	24.8	14.9	14.9	45.4	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$95,081
			Median Gross Rent			\$670
			Families Below Poverty Level			12.6%
Source: 2015 ACS 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.						

The AA includes all of Lee and Milam counties census tracts. We combined the counties for analytical purposes as both are rural adjacent non-MSA counties. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies. Classic operates two branches, the main office, and three ATMs within this AA. This AA consists of 11 CTs with a combined population of 41,008. There are no low-income CTs and approximately 9.1 percent of the AA is in a moderate-income CT. The majority of the populace resides in a middle-income CT. Approximately 64.1 percent of loan originations between 2018 and 2020 were made within this AA and the greatest weight will be given to this AA in our analysis.

Economic conditions are generally good, but slowdowns did occur starting in 2020 due to the pandemic. Main industries in Milam County relate to services, healthcare, and retail trade. Major employers include county and city employees, school district employees, medical service providers, and light manufacturing companies such as Butler Weldments and Charlotte Pipe. In 2018, Luminant closed its operations in Rockdale resulting in a loss of 450 jobs directly related to Luminant and indirectly to subcontractors who did work for Luminant. The plant closing resulted in lost revenue for hotels, trailer parks and restaurants in the area, as well a substantial loss of tax revenue for the school district and the county.

The average median family income of the AA was \$52,198; 12.6 percent of families within the AA were considered below poverty. The U.S. Bureau of Labor Statistics identified unemployment rates ranging from 4.7 percent and 6.7 percent across the two counties within the AA as of December 31, 2020. Both county rates compare favorably to the 6.9 percent reported for the state of Texas and the national rate of 6.7 percent. Major employers include the local school district, local government, and healthcare facilities.

Classic faces some competition, primarily from local and regional institutions within this AA. The FDIC Deposit Market Share Report showed Classic with \$232 million in deposits within the AA or 25 percent of the market share. Classic ranked first out of seven institutions by deposit market share. Classic also ranked second among 150 financial institutions for mortgage lending market share within the AA at 6 percent.

To help identify needs and opportunities in the AA we reviewed two recent regulatory agency contacts and found primary needs included small business lending and affordable housing.

## Falls County AA

The following table reflects pertinent demographic information about the AA.

Demographic Information of the Falls County Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	7,899	0.0	0.0	66.3	33.7	0.0
Housing Units by Geography	3,448	0.0	0.0	72.0	28.0	0.0
Owner-Occupied Units by Geography	1,996	0.0	0.0	70.3	29.7	0.0
Occupied Rental Units by Geography	469	0.0	0.0	63.5	36.5	0.0
Vacant Units by Geography	983	0.0	0.0	79.2	20.8	0.0
Businesses by Geography	393	0.0	0.0	72.0	28.0	0.0
Farms by Geography	61	0.0	0.0	72.1	27.9	0.0
Family Distribution by Income Level	1,701	23.6	14.1	17.8	44.5	0.0
Household Distribution by Income Level	2,465	24.3	15.5	15.7	44.5	0.0
Median Family Income MSA - TX		\$54,026	Median Housing Value			\$74,800
			Median Gross Rent			\$566
			Families Below Poverty Level			14.3%
Source: 2015 ACS 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.						

Falls County consist of a total of six CTs, but this AA consists of three CTs, including the CT where the bank branch is. The AA does not include any low or moderate income CTs nor are these CTs adjacent to any low or moderate-income CTs within the county. Because of this, we found that the AA does not arbitrarily exclude low or moderate-income geographies. We performed a limited review of this AA because analysis would not be as meaningful due to the lack of LMI geographies.

To help identify needs and opportunities in the AA we completed a community contact and found the primary need was affordable housing.

## Scope of Evaluation in Texas

We selected the Bastrop and Williamson Counties AA and the Lee and Milam Counties AA for full scope reviews because they accounted for the majority of originations during the evaluation period. We performed a limited-scope review of the Falls County AA because there were no low or moderate-income CTs which limits the ability to provide meaningful analysis. Refer to Appendix A for a list of all AAs under review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS**

### **LENDING TEST**

The bank's performance under the Lending Test in Texas is rated Satisfactory.

#### **Conclusions for Areas Receiving Full Scope Reviews**

Based on full and limited scope reviews, the bank's lending performance in the state of Texas is reasonable.

#### **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of loans in the state.

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

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

##### **Bastrop and Williamson Counties AA**

The geographic distribution of the bank's home mortgage loans is excellent. The percentage of bank loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in these areas and the bank's lending performance in moderate-income areas exceeds performance from other area mortgage lenders as reported in the Aggregate Lending (aggregate) data. Although the bank did not overperform in the low-income geographies, this was not a concern given the fact that low income tracts accounted for just 0.6 percent of the overall loans within the AA.

##### **Lee and Milam Counties AA**

The geographic distribution of the bank's home mortgage loans is reasonable. The AA does not include any low-income geographies. Although the percentage of home mortgage loans to moderate-income census tracts was below the percentage of owner-occupied housing units, the aggregate of other lenders also fell below this percentage. Classic was just slightly below the aggregate percentage for moderate-income census tracts.

##### ***Small Loans to Businesses***

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

##### **Bastrop and Williamson Counties AA**

The geographic distribution of small loans to businesses is excellent. The percentage of bank loans in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies. The bank's performance exceeds aggregate data from other area small business lenders. There were no loans to low-income geographies which accounted for 1.2 percent of loans to small businesses within this AA.

### Lee and Milam Counties AA

The geographic distribution of small loans to businesses is reasonable. There were no loans to small businesses located within a low-income geography based on available market data for this AA. Although the percentage of loans to small businesses to moderate-income geographies was below the percentage of small businesses, the aggregate of other lenders also fell below this percentage. Classic was just slightly below the aggregate percentage for moderate-income geographies.

### ***Small Loans to Farms***

Refer to Table S in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

### Bastrop and Williamson Counties AA

The geographic distribution of loans to farms is poor. No small loans to farms were made within a low or moderate-income geography over the evaluation period. Loans to farms are not considered a primary product for this AA.

### Lee and Milam Counties AA

The geographic distribution of loans to farms is reasonable. There were no loans to farms located within a low-income geography based on available market data for this AA. Loans to farms located in a moderate-income geography were comparable to the percent of farms located within the moderate-income geographies.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

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

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### Bastrop and Williamson Counties AA

The distribution of bank home mortgage loans to borrowers of different income levels is reasonable. The percentage of bank loans to low-income families is less than the percentage of low-income families in the AA, but exceeds distributions reported by competitors in the Aggregate Lender data. The percentage of bank loans to moderate-income families is significantly less than the percentage of moderate-income families and significantly less than Aggregate Lender distributions. The increased demand for affordable housing, coupled with rising costs of housing and challenges associated with down payment and closing costs all negatively impacted the bank's performance.

Lee and Milam Counties AA

The distribution of home mortgage loans to individuals of different income levels is poor. The percentage of bank loans to both low-income and moderate-income borrowers is significantly below the percentage of low and moderate income families within these geographies. The bank is comparable to other home mortgage lenders when looking at the aggregate data for low-income borrowers but is significantly below the aggregate data for moderate-income borrowers.

***Small Loans to Businesses***

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Bastrop and Williamson Counties AA

The distribution of small loans to businesses is excellent. The percentage of bank loans to businesses with annual revenues of \$1 million or less is similar to the total percent of small businesses within the AA. The bank's percentage exceeds by almost double the aggregate percentage reported by other business lenders in the AA.

Lee and Milam Counties AA

The distribution of small loans to businesses is excellent. The percentage of bank loans to businesses with annual revenues of \$1 million or less exceeds the total percent of small businesses within the AA. The bank's percentage exceeds by more than twice the aggregate percentage reported by other business lenders in the AA.

***Small Loans to Farms***

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Bastrop and Williamson Counties AA

The distribution of small loans to farms is excellent. All loans within the sample size were to farms with annual revenues of \$1 million or less. This also exceeds the aggregate data on lending made by other financial institutions within the AA.

Lee and Milam Counties AA

The distribution of small loans to farms is excellent. Nearly all loans within the sample size were to farms with annual revenues of \$1 million or less. This also exceeds the aggregate data on lending made by other financial institutions within the AA.

**Responses to Complaints**

Classic did not receive any complaints related to its CRA or fair lending performance during the evaluation period.



## Conclusions for Area Receiving a Limited Scope Review

Based on limited scope review, the bank's performance under the Lending Test in the Falls County AA is consistent with the bank's overall performance under the Lending Test in the full scope AAs. There were no low or moderate-income geographies within the AA, so the greatest weight of our analysis was on the distribution of loans by income or revenue. We noted that Classic outperformed the home mortgage aggregate level data for lending to low or moderate-income families. Classic also exceeded the level of lending to moderate-income families within the AA. The greatest weight of our analysis was on the distribution of loans by income or revenue. The borrower distribution for small loans to businesses and farms is consistent with the full-scope AAs.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Texas is rated satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope and limited-scope reviews, the bank exhibits reasonable responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
<b>Full-Scope Reviews</b>				
Bastrop and Williamson Counties AA	3	25	2,074	40
Lee and Milam Counties AA	9	75	3,062	60
<b>Limited Scope Review</b>				
Falls County AA	0	0	0	0
<b>Total</b>	<b>12</b>	<b>100</b>	<b>5,136</b>	<b>100</b>
Source: Bank Data 1/1//2018 to 12/31/2020				

Classic originated a total of 12 CD loans over the evaluation period, totaling \$5.1 million across its AAs. This accounted for approximately 12 percent of the bank's tier 1 capital as of December 31, 2020. There were no CD loans within the Falls County AA.

Bastrop and Williamson Counties AA

Classic originated a total of three CD loans totaling \$2.1 million in the AA. This accounted for 40 percent of all CD loans based on dollar volume. This also accounted for five percent of the bank's tier 1 capital. Examples of CD loans within this AA include:

- An apartment complex with majority of tenants being LMI
- Municipal loans that help benefit LMI CTs

Lee and Milam Counties AA

Classic originated a total of nine CD loans totaling \$3.1 million in the AA. This accounted for 60 percent of all CD loans based on dollar volume. This also accounted for seven percent of the bank's tier 1 capital.

- One loan totaling \$850 thousand for an apartment complex with half of the units rented to LMI individuals. There were several other loans to apartment complexes that were targeted to LMI individuals.
- School district loan where a large portion of the student population is considered economically disadvantaged.

**Number and Amount of Qualified Investments**

<b>Qualified Investments</b>										
<b>Assessment Area</b>	<b>Prior Period*</b>		<b>Current Period</b>		<b>Total</b>				<b>Unfunded Commitments**</b>	
	<b>#</b>	<b>\$ (000's)</b>	<b>#</b>	<b>\$ (000's)</b>	<b>#</b>	<b>% of Total #</b>	<b>\$ (000's)</b>	<b>% of Total \$</b>	<b>#</b>	<b>\$ (000's)</b>
<b>Full Scope</b>										
Bastrop and Williamson Counties AA	0	0	6	7	6	15	7	26	0	0
Lee and Milam Counties AA	0	0	32	17	32	78	17	63	0	0
<b>Limited Scope Review</b>										
Falls County AA	0	0	3	3	3	7	3	11	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>41</b>	<b>27</b>	<b>41</b>	<b>100</b>	<b>27</b>	<b>100</b>	<b>0</b>	<b>0</b>
* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. ** Unfunded Commitments' means legally binding investment commitments tracked and recorded by the institution's financial reporting system.#										

Bastrop and Williamson Counties AA

Donations during the evaluation period totaled \$7 thousand. A listing of CD investments was not provided. Donations included:

- One \$1,500 donation to provide healthcare services to LMI individuals.
- One \$1,500 donation to help support children in foster care and the TX welfare system.

Lee and Milam Counties AA

Donations during the evaluation period totaled \$17 thousand. A listing of CD investments was not provided. Donations included:

- One \$3,000 donation to benefit an organization aimed at expanding businesses in Cameron.

- One \$1,141 donation to benefit children in foster care and the TX welfare system.

### **Extent to Which the Bank Provides Community Development Services**

#### **Bastrop and Williamson Counties AA**

During the evaluation period, eight employees provided 110 hours of service to three organizations. The services were primarily for community service with the majority being to one organization as part of a large back-to-school campaign that primarily benefitted LMI individuals.

#### **Lee and Milam Counties AA**

During the evaluation period, seven employees provided 528 hours of service to 13 organizations. Employees generally served as Board members for the various organizations. The services provided ranged from affordable housing opportunities, economic development, community service, and CT stability and revitalization. Examples of services include community service to food pantries, serving as members to programs awarding scholarships to LMI students, and serving as Board members for organizations that support LMI individuals.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited scope review, Classics performance under the CD Test in the Falls County AA is weaker than the bank's overall performance under the CD Test in the full scope areas. There were no CD loans within the AA during the evaluation period. There were no CD services within the AA during the evaluation period. CD investments were limited to donations totaling \$3 thousand. Weaker performance in the limited-scope AA had a limited impact on the overall CD rating.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2018 to 12/31/2020	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and small farms Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Texas</b>		
Bastrop and Williamson Counties AA	Full-scope	Part of Austin-Round Rock-Georgetown MSA (12420). Includes all 10 census tracts in Bastrop County and 89 census tracts in Williamson County.
Lee and Milam Counties AA	Full-scope	Non-MSA; includes all 4 census tracts in Lee County and all 7 census tracts in Milam County.
Falls County AA	Limited-scope	Part of Waco MSA (47380). Includes three census tracts (0002.00, 0005.00, and 0007.00) in Falls County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		Classic Bank, NA	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Classic Bank, NA	Satisfactory	Satisfactory	Satisfactory
Texas	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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, other secured consumer loans, and other unsecured consumer loans.

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent and less than 120 percent, in the case of a geography

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

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

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

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

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

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



**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size)

throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-scope Reviews																			
Bastrop and Williamson Counties AA 2020	61	17,348	21.3	35,311	0.6	0.0	0.3	11.8	32.8	7.1	55.6	60.7	55.8	32.0	6.6	36.9	0.0	0.0	0.0
Lee and Milam Counties AA 2020	187	34,065	65.2	760	0.0	0.0	0.0	7.0	3.7	4.3	55.2	58.8	54.2	37.9	37.4	41.4	0.0	0.0	0.0
Limited-scope Review																			
Falls County AA 2020	39	5,968	13.6	122	0.0	0.0	0.0	0.0	0.0	0.0	70.3	69.2	74.6	29.7	30.8	25.4	0.0	0.0	0.0
<b>Total</b>	<b>287</b>	<b>57,381</b>	<b>100.0</b>	<b>36,193</b>	<b>0.5</b>	<b>0.0</b>	<b>0.3</b>	<b>11.3</b>	<b>9.4</b>	<b>7.0</b>	<b>55.7</b>	<b>60.6</b>	<b>55.8</b>	<b>32.4</b>	<b>30.0</b>	<b>36.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<i>Source: 2015 ACS Census; 01/01/2018 - 12/21/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																			

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2018-20**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-scope Reviews																			
Bastrop and Williamson Counties AA 2020	61	17,348	25.0	35,311	17.7	5.6	4.8	17.6	9.8	18.5	22.5	18.0	25.0	42.2	54.1	35.9	0.0	20.0	15.8
Lee and Milam Counties AA 2020	187	34,065	65.2	760	18.5	1.7	2.8	16.5	3.7	9.6	19.1	13.4	21.7	45.9	71.7	49.7	0.0	10.7	16.2
Limited-scope Review																			
Falls County AA 2020	39	5,968	14.5	122	23.6	10.0	9.0	14.1	17.9	12.3	17.8	20.7	23.0	44.5	64.1	41.0	0.0	--	14.8
<b>Total</b>	<b>287</b>	<b>57,381</b>	<b>100.0</b>	<b>36,193</b>	<b>17.9</b>	<b>1.7</b>	<b>4.8</b>	<b>17.5</b>	<b>7.0</b>	<b>18.3</b>	<b>22.2</b>	<b>14.6</b>	<b>24.9</b>	<b>42.5</b>	<b>66.9</b>	<b>36.2</b>	<b>0.0</b>	<b>10.5</b>	<b>15.8</b>
<i>Source: 2015 ACS Census ; 01/01/2018 - 12/21/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																			

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2018-20**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-scope Reviews																			
Bastrop and Williamson Counties AA 2020	20	3,312	100.0	15,013	1.2	0.0	1.3	12.7	30.0	12.7	57.6	60.0	50.0	28.5	10.0	35.9	0.0	0.0	0.0
Lee and Milam Counties AA 2020	20	1,918	100.0	610	0.0	0.0	0.0	10.4	5.0	5.7	58.9	60.0	59.2	30.7	35.0	35.1	0.0	0.0	0.0
Limited-scope Review																			
Falls County AA 2020	20	2,457	100.0	85	0.0	0.0	0.0	0.0	0.0	0.0	72.0	40.0	75.3	28.0	60.0	24.7	0.0	0.0	0.0
<b>Total</b>	<b>60</b>	<b>7,687</b>	<b>100.0</b>	<b>15,708</b>	<b>1.2</b>	<b>0.0</b>	<b>1.3</b>	<b>12.5</b>	<b>14.2</b>	<b>12.4</b>	<b>57.7</b>	<b>53.6</b>	<b>50.5</b>	<b>28.6</b>	<b>32.2</b>	<b>35.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<i>Source: 2020 D&amp;B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  Due to rounding, totals may not equal 100.0%</i>																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-scope Reviews											
Bastrop and Williamson Counties AA 2020	20	3,312	100	15,013	91.6	90.0	48.4	2.2	10.0	6.2	0.0
Lee and Milam Counties AA 2020	20	1,918	100	610	84.4	85.0	33.0	4.2	15.0	11.4	0.0
Limited-scope Reviews											
Falls County AA 2020	20	2,457	100	85	86.5	75.0	37.6	3.8	25.0	9.7	0.0
<b>Total</b>	<b>60</b>	<b>7,687</b>	<b>100.0</b>	<b>15,708</b>	<b>91.3</b>	<b>84.0</b>	<b>47.8</b>	<b>2.3</b>	<b>16.0</b>	<b>6.4</b>	<b>0.0</b>
<i>Source: 2020 D&amp;B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>											

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2018-20**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-scope Reviews																			
Bastrop and Williamson Counties AA 2020	20	3,336	33.3	205	0.9	0.0	0.0	15.1	0.0	23.9	62.1	100.0	68.3	22.0	0.0	7.8	0.0	0.0	0.0
Lee and Milam Counties AA 2020	20	9,311	33.3	111	0.0	0.0	0.0	5.3	5.0	7.2	55.9	65.0	56.8	38.8	30.0	36.0	0.0	0.0	0.0
Limited-scope Reviews																			
Falls County AA 2020	20	9,295	33.3	77	0.0	0.0	0.0	0.0	0.0	0.0	72.1	70.0	63.6	27.9	30.0	36.4	0.0	100.0	0.0
<b>Total</b>	<b>60</b>	<b>21,942</b>	<b>100.0</b>	<b>393</b>	<b>0.8</b>	<b>0.0</b>	<b>0.0</b>	<b>13.4</b>	<b>1.7</b>	<b>14.5</b>	<b>61.7</b>	<b>78.3</b>	<b>64.1</b>	<b>24.2</b>	<b>20.0</b>	<b>21.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<i>Source: 2020 D&amp;B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>																			



Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-20
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-scope Reviews											
Bastrop and Williamson Counties AA 2020	20	3,336	33.3	205	97.0	100.0	62.9	1.5	0.0	1.5	--
Lee and Milam Counties AA 2020	20	9,311	33.3	111	99.1	95.0	58.6	0.4	5.0	0.4	0.0
Limited-scope Review											
Falls County AA 2020	20	9,295	33.3	77	98.4	75.0	81.8	0.0	25.0	1.6	0.0
<b>Total</b>	<b>60</b>	<b>21,942</b>	<b>100.0</b>	<b>393</b>	<b>97.3</b>	<b>90.0</b>	<b>65.4</b>	<b>1.3</b>	<b>10.0</b>	<b>1.4</b>	<b>0.0</b>
<i>Source: 2020 D&amp;B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.</i> <i>Due to rounding, totals may not equal 100.0%</i>											

## Classic Bank, N.A.

### Banking Center Locations and Hours of Operation As of: March 1, 2024

Branch Name	Address	City	State	Zip	County Name	State Code	MSA/MD Code	Census Tract	Census Tract Income	Lobby Hours	Drive-Thru Hours
Cameron – Lobby	102 N Houston	Cameron	TX	76520	Milam	48	N/A	9504.02	Middle	M-T 9 am - 5 pm Fri 9 am – 5:30 pm	N/A
Cameron – MotorBank	311 N Houston	Cameron	TX	76520	Milam	48	N/A	9504.02	Middle	N/A	M-T 8 am - 5 pm Fri 8 am – 5:30 pm  ATM Deposit available 24 Hours
Rosebud	204 South 5 <sup>th</sup> Street	Rosebud	TX	76570	Falls	48	47380	0007.00	Moderate	M-T 8:30 am–3 pm Fri 8:30 am – 5 pm	M-T 7:30 am–3 pm Fri 7:30 am – 5 pm  ATM Deposit available 24 Hours
Giddings	825 East Austin Street	Giddings	TX	78942	Lee	48	N/A	0004.00	Moderate	M-T 9 am - 5 pm Fri 9 am – 5:30 pm	M-T 8 am - 5 pm Fri 8 am – 5:30 pm  ATM Deposit available 24 Hours
Rockdale	1707 West Cameron Avenue	Rockdale	TX	76567	Milam	48	N/A	9507.00	Middle	M-T 9 am - 5 pm Fri 9 am – 5:30 pm	M-T 8 am - 5 pm Fri 8 am – 5:30 pm  ATM Deposit available 24 Hours
Bastrop	493 Hwy 71 West	Bastrop	TX	78602	Bastrop	48	12420	9504.00	Moderate	M-F 9 am - 5 pm	M-F 8 am - 5 pm  ATM Deposit available 24 Hours
Liberty Hill	12251 W St Hwy 29	Liberty Hill	TX	78642	Williamson	48	12420	0203.01	Middle	M-F 9 am - 5 pm	M-F 8 am - 5 pm  ATM Deposit available 24 Hours
Thorndale	204 West Hwy 79	Thorndale	TX	76577	Milam	48	N/A	9508.00	Upper	M-F 9 am - 5 pm	M-F 9 am - 5 pm

**CLASSIC BANK, N.A.**  
**LIST OF BRANCHES OPENED AND CLOSED**  
**(2024)**

*A list of branches opened or closed by the bank during the current year and each of the prior two calendar years, their street addresses, and geographies. (12 CFR 25.43(a)(4))*

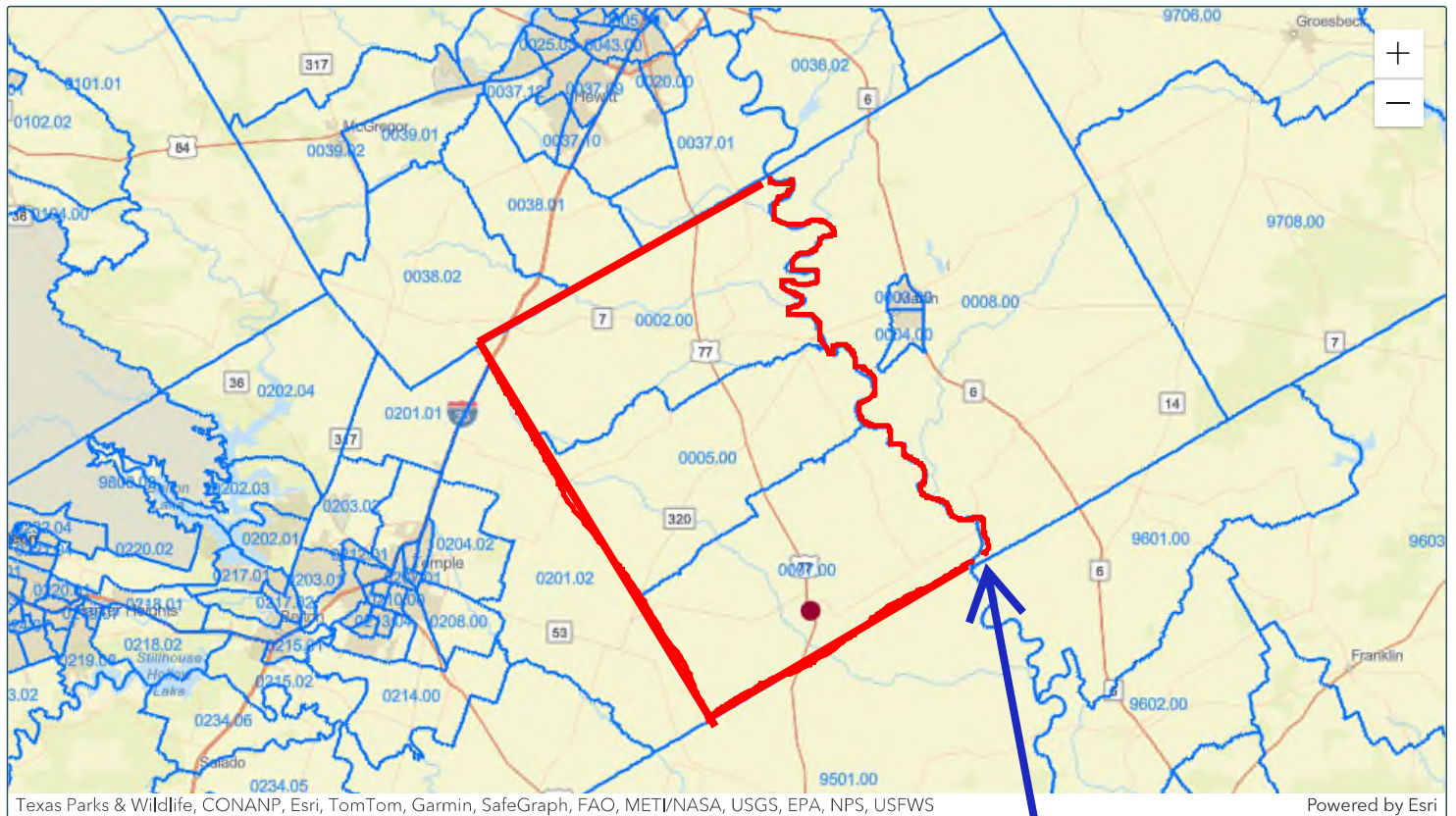
Branches Opened			
Year	Name/Location	Geography	Date
2024	None	n/a	n/a
2023	Thorndale Branch 204 West Hwy 79 Thorndale, TX 76577	MSA: N/A State – 48, Texas County – 331 Milam Tract Code – 9508.00	03/06/2023
2022	None	n/a	n/a
Branches Closed			
2024	None	n/a	n/a
2023	None	n/a	n/a
2022	None	n/a	n/a
Branches Relocated			
2024	None	n/a	n/a
2023	None	n/a	n/a
2022	None	n/a	n/a





FFIEC Geocoding/Mapping System – 2023

Falls County



● Matched Address: 204 S 5th St, Rosebud, Texas, 76570

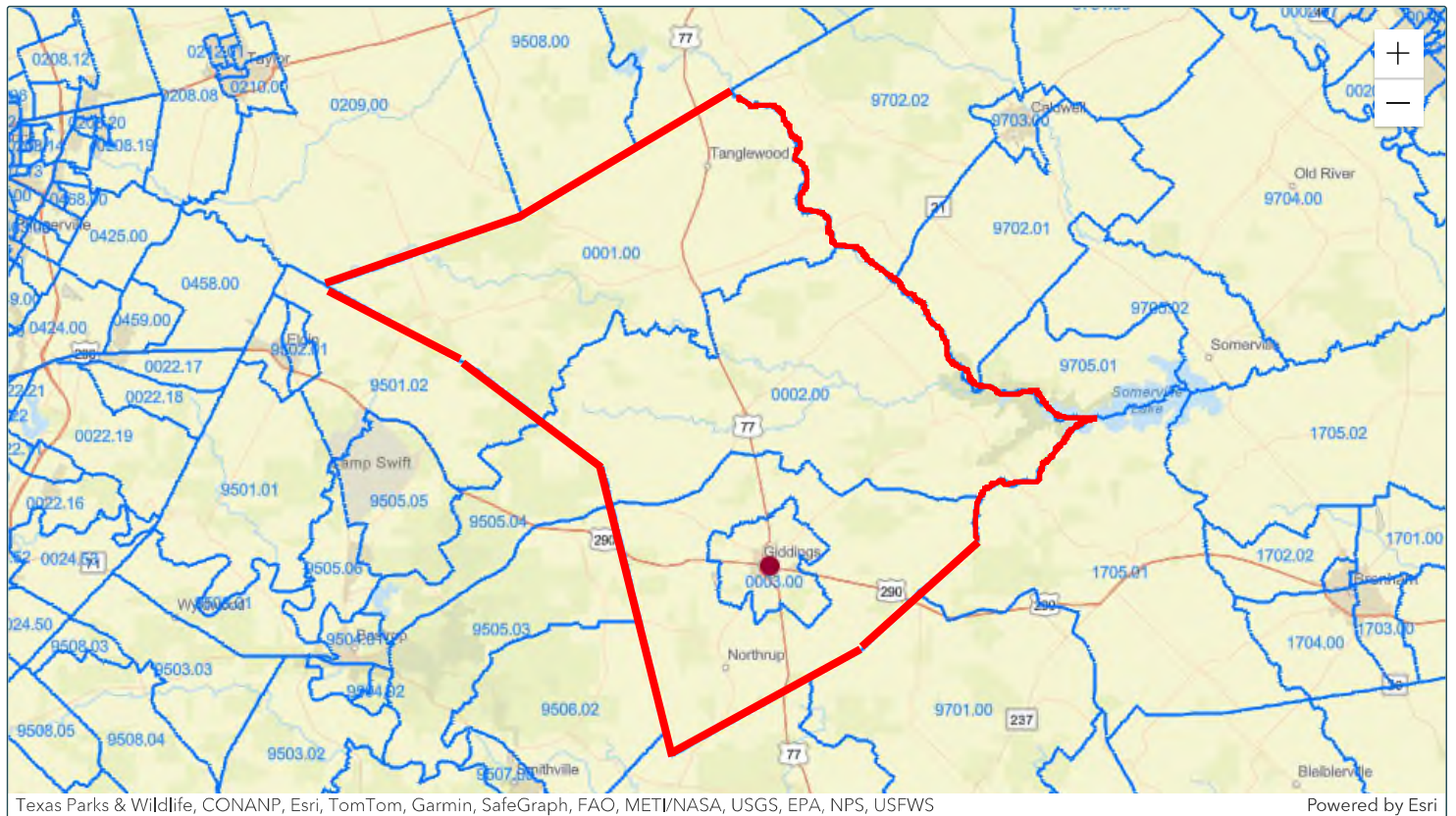
MSA: 47380 - WACO, TX || State: 48 - TEXAS || County: 145 - FALLS COUNTY || Tract Code: 0007.00

Brazos River

● Selected Tract

MSA: || State: || County: || Tract Code:



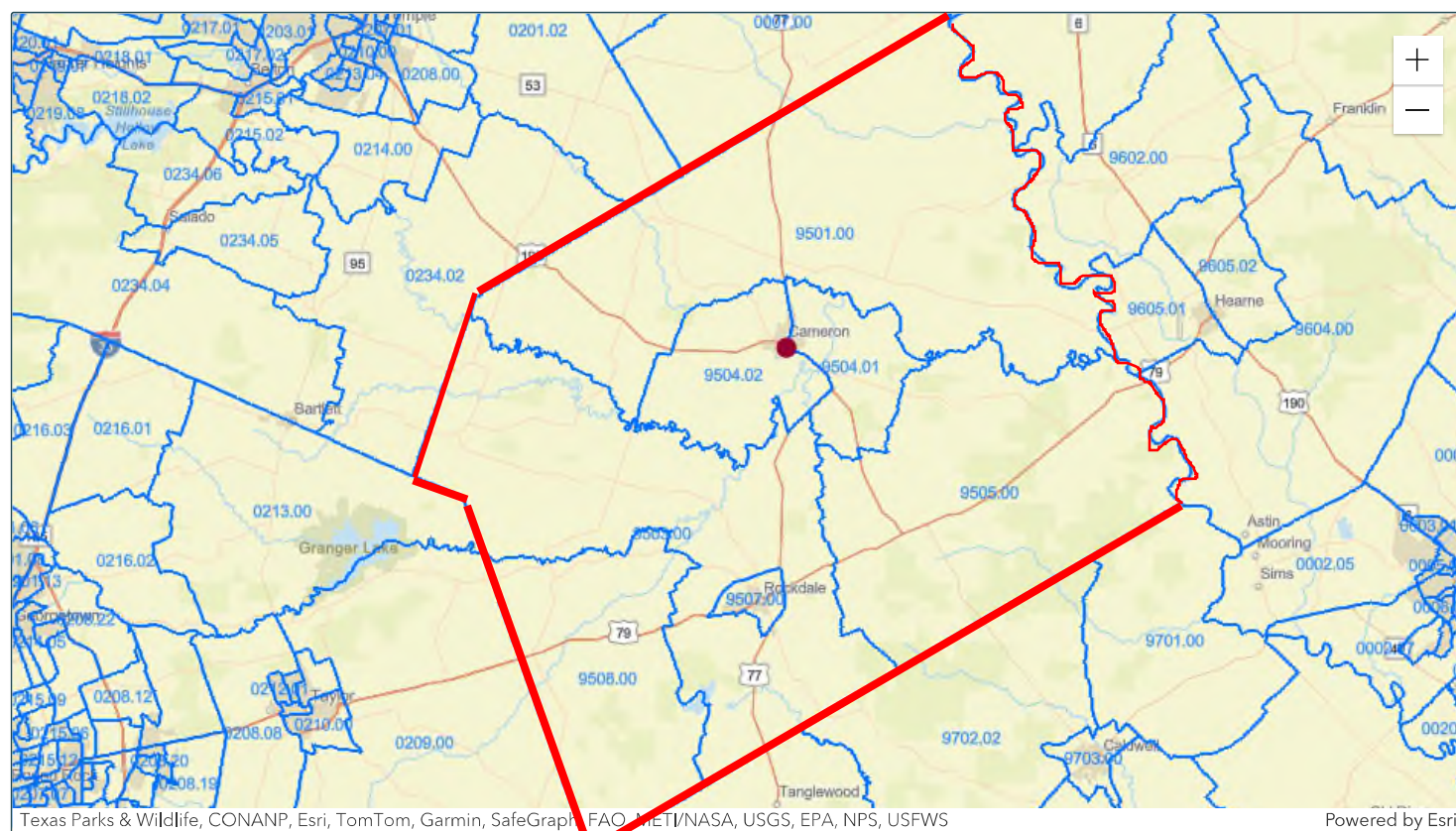


● Matched Address: 825 E Austin St, Giddings, Texas, 78942

MSA: NA - NA (Outside of MSA) || State: 48 - TEXAS || County: 287 - LEE COUNTY || Tract Code: 0004.00

● Selected Tract

MSA: || State: || County: || Tract Code:



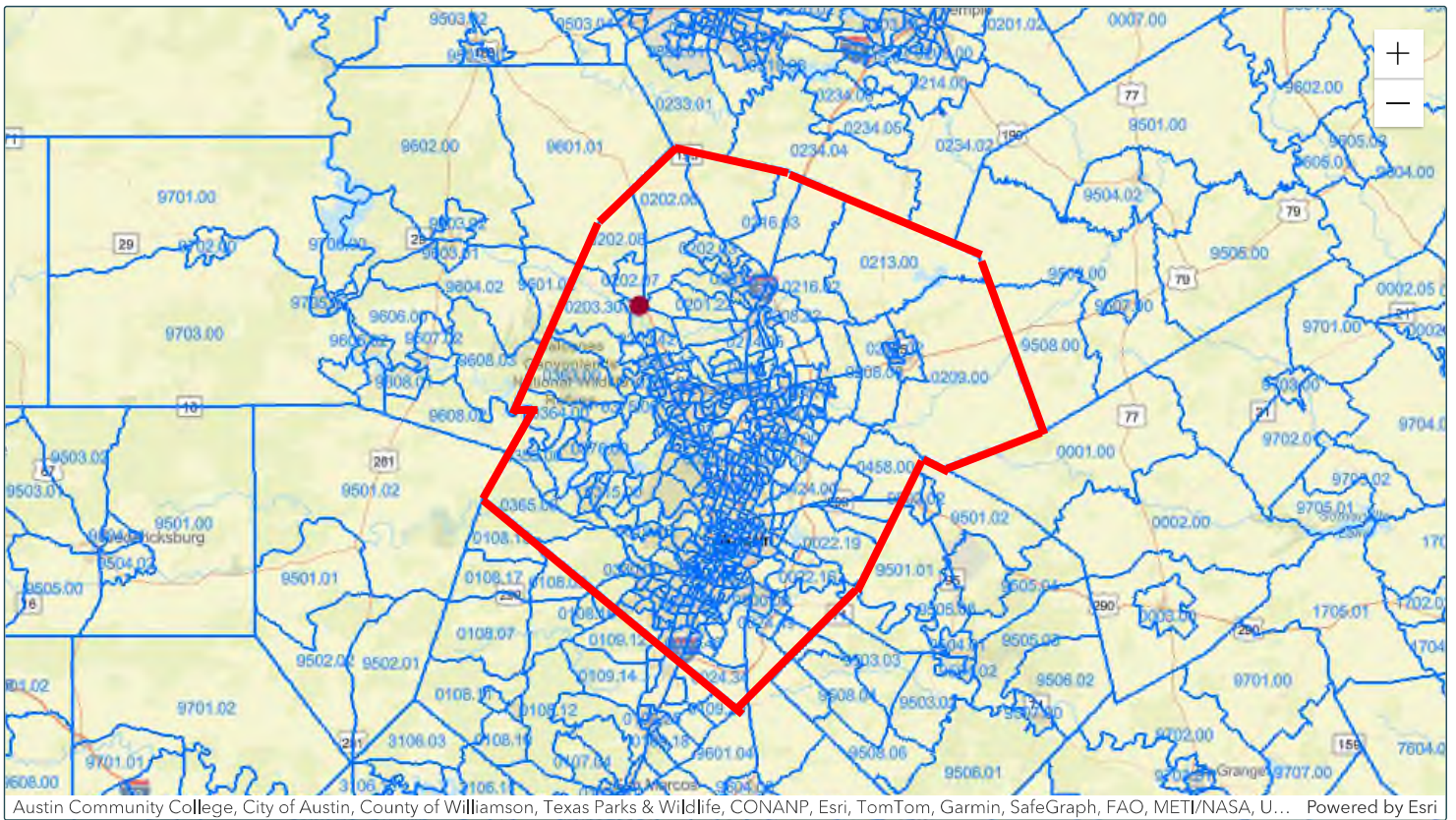
● Matched Address: 102 N Houston Ave, Cameron, Texas, 76520

MSA: NA - NA (Outside of MSA) || State: 48 - TEXAS || County: 331 - MILAM COUNTY || Tract Code: 9504.02

Selected Tract

MSA: || State: || County: || Tract Code:





Austin Community College, City of Austin, County of Williamson, Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, SafeGraph, FAO, METI/NASA, U... Powered by Esri

● Matched Address: 12251 W Sh 29, Liberty Hill, Texas, 78642

MSA: 12420 - AUSTIN-ROUND ROCK-GEORGETOWN, TX || State: 48 - TEXAS || County: 491 - WILLIAMSON COUNTY || Tract Code: 0203.29

● Selected Tract

MSA: || State: || County: || Tract Code:



**Classic Bank, N.A.**

**HMDA Disclosure Statement**

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web (CFPB) website:

([www.consumerfinance.gov/data-research/hmda](http://www.consumerfinance.gov/data-research/hmda)).

HMDA data for many other financial institutions are also available at this website.