



PUBLIC DISCLOSURE

July 10, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Column National Association
Charter Number 24626

1717 Mangrove Avenue, Suite 100,
Chico, CA 95926

Office of the Comptroller of the Currency

Novel Bank Supervision
91 Fieldcrest Avenue, Suite A-30
Edison, New Jersey 08837

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 major factors that support this rating include:

- A substantial majority of lending is inside the bank's assessment area (AA).
- A reasonable geographic distribution of loans.
- A reasonable borrower distribution of loans to small businesses.
- The loan-to-deposit ratio is less than reasonable.
- Adequate responsiveness to community needs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is less than reasonable.

The LTD ratio is calculated on a bank-wide basis. Column's quarterly average LTD ratio for the 12 quarters from March 2019 through December 2021 was 48.3 percent. Column had a high LTD of 57.5 percent and a low of 42.0 percent. In comparison, the quarterly average LTD ratio for five similarly situated institutions in the AA and adjacent AAs was 70.6 percent over the same 12-quarter period, with a high of 84.7 percent and a low of 59.1 percent. The OCC identified only one bank in the AA of similar size, and the average LTD of this bank during the 12-quarter period was 62.2 percent. Column competes with several large banks in the area for small business lending, including Wells Fargo Bank, National Association (NA), Bank of America, NA, JPMorgan Chase Bank, NA, and U.S. Bank, NA.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 78.6 percent of its total loans inside the bank's AA 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. The analysis includes loans originated as part of the Small Business Administration's Paycheck Protection Program (PPP) in 2020 and 2021.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	304	78.6	83	21.4	387	42,276	61.8	26,093	38.2	68,369
Total	304	78.6	83	21.4	387	42,276	61.8	26,093	38.2	68,369

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

Column National Association (Column or bank), previously known as Northern California National Bank (NCNB) is a community bank headquartered in Chico, CA. Column acquired NCNB in June 2021 and has no holding company. As of December 31, 2021, Column reported total assets of \$453.3 million with loans totaling \$190.0 million, or 42 percent of total assets, and total deposits of \$389.7 million. Tier 1 capital totaled \$44.2 million. During the evaluation period, Column focused on lending activity primarily in non-residential real estate and commercial loans. The bank also offers residential real estate loans and agriculture loans, and purchases auto loans through Woodside Credit.

Column operates one full-service branch at its headquarters in Chico, CA and a loan production office in Sacramento, CA. The headquarters lobby is open Monday through Thursday from 9:00 am to 5:00 pm, with extended hours on Friday until 6:00 pm. Additionally, the bank provides walk-up services beginning at 8:30 am Monday through Friday. The headquarters has a drive-up automated teller machine (ATM) for 24-hour banking. The bank also offers online banking, Automated Clearing House (ACH) services and remote deposit capture for customers. No branches were opened or closed during the evaluation period.

During the evaluation period, Column operated primarily in the state of California and the bank is located in Butte County, which is part of the Chico Metropolitan Statistical Area (MSA). The bank's AA includes all census tracts (CTs) in Butte County. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs.

Although competition in the AA is limited to 11 other institutions, the bank competes against several large financial institutions. As of June 30, 2021, the Federal Deposit Insurance Corporation (FDIC) reported 12 FDIC-insured financial institutions in the AA, with 38 deposit-taking offices. Column ranks 8th in deposit market share with a market share of 4.6 percent. The four banks with the largest market share hold a combined 67.4 percent of total deposits. The top four institutions are Tri Counties Bank, Wells Fargo Bank, NA, Bank of America, NA, and JPMorgan Chase Bank, NA.

This is the first evaluation for Column since acquiring NCNB. NCNB was previously evaluated on February 11, 2019 and received a "Satisfactory" rating. There were no other legal, financial, or other barriers present during the evaluation period that would impede the bank's ability to meet the credit needs of the AA.

The following table reflects details about the bank's loan portfolio as of December 31, 2021.

Table 1

COLUMN NATIONAL ASSOCIATION LOAN PORTFOLIO COMPOSITION AS OF DECEMBER 31, 2021		
Loan Type	\$ Volume (000)	% of Portfolio
Commercial (including non-residential and land)	151,365	79.6
Residential 1-4 Family Real Estate	17,070	9.0
Automobile	15,548	8.2
Agricultural	5,355	2.8
Other	702	0.4
Total Loans	190,040	100.0

Source: Consolidated Report of Condition as of December 31, 2021

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the CRA performance of Column using the Small Bank CRA examination procedures. The OCC performed a full-scope evaluation of the bank's AA. Refer to appendix A for detailed information of the scope and AA.

The evaluation period for the lending and community development tests was January 1, 2019 through December 31, 2021. The OCC determined that commercial loans were the bank's primary loan product during this evaluation period. The loans originated throughout the evaluation period were compared to the 2015 American Community Services (ACS) Census Data and 2021 D&B data.

The lending test assessed the distribution of small businesses by geography and gross annual revenue in the AA. During the evaluation period, the bank originated 233 PPP loans in the AA, which accounted for 76.7 percent of total small business loans originated. As part of the PPP program, the bank was not required to collect gross annual revenue. Therefore, the OCC excluded loans originated under the PPP from its analysis of distribution of small businesses by geography and gross annual revenue. The bank also submitted community development loans for consideration. The OCC sampled loan data derived from bank reporting and determined the data was accurate and reliable.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within the state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs 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. 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 a blend of the state ratings, and where applicable, multistate ratings.

The overall rating is based on performance in Column's AA in the state of California. Column's primary product is commercial loans, and this product was given full weight when considering the bank's performance. Additionally, consideration was given to the bank's community development activities, which can either have a positive or neutral impact on the rating.

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 (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A substantial majority of loans are within the AA.
- The geographic distribution of loans reflects a reasonable distribution throughout the bank's AA.
- The borrower distribution of loans reflects a reasonable distribution throughout the bank's AA.
- Less than reasonable LTD ratio.

Description of Institution's Operations in California

During the evaluation period, Column's (previously NCNB's) strategy focused on providing banking services to small and medium sized businesses, owners of agricultural operations and related businesses, and business professionals. Column's 2021 Strategic Plan noted that the bank's target market continues to be the City of Chico and the surrounding cities in Butte County, plus Sacramento through the bank's Loan Production Office. The bank's AA includes all 51 CTs in Butte County, which consists of two low-income CTs, 14 moderate-income CTs, 24 middle-income CTs, and 11 upper-income CTs. Although the bank did not lend in all of the CTs, there was no evidence of exclusion.

Per the Moody's Analytics report dated March 2023, the Chico, CA economy benefits from economic drivers in the healthcare and university sectors. Market strengths include an older population that helps support the healthcare sector, and the presence of a state university. The top three employers in the city are Enloe Medical Center, Oroville Hospital, and California State University – Chico. Additionally, the agriculture sector contributes to the local economy, however farms in the area have been facing significant challenges due to drought conditions (the farms in the area produce almonds and rice primarily, which are both water intensive). Moody's Analytics also noted some weaknesses in the Chico economy including a dearth of high-wage industries, low educational attainment locally (despite the presence of a university), and high employment volatility. Job growth, primarily driven by healthcare, has slowed and continues to be lower than the national and California averages. Over the evaluation period, the unemployment rate increased from 5.2 percent in 2019 to 9.5 percent in 2020, primarily due to the impact of the COVID-19 pandemic. As the economy stabilized, however, the unemployment rate improved to 6.9 percent in 2021 and 4.5 percent in 2022, which were below pre-pandemic levels.

Community Contact

One community contact interview was completed on March 18, 2021, with a private, non-profit Community Development Financial Institution committed to economic development in Butte County. The organization fosters relationships with community partners and businesses to develop and implement comprehensive economic development strategies and assist with financing needs for local businesses in California's Butte, Glenn, and Tehama counties. The contact stated that the City of Chico continues to need affordable, multifamily housing. The contact also stated that there are opportunities in

the community for banks to assist small businesses. In particular, the contact noted that banks can assist with the front end of loan preparation and working with businesses through the funding process.

Butte County – Chico MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Column 2021 Butte County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	51	3.9	27.5	47.1	21.6	0.0
Population by Geography	222,564	3.9	26.2	46.6	23.3	0.0
Housing Units by Geography	97,133	3.9	25.0	48.1	23.0	0.0
Owner-Occupied Units by Geography	50,031	0.9	20.3	51.6	27.2	0.0
Occupied Rental Units by Geography	35,287	7.5	29.4	44.2	18.8	0.0
Vacant Units by Geography	11,815	5.6	32.1	44.5	17.8	0.0
Businesses by Geography	16,077	1.5	27.4	43.6	27.4	0.0
Farms by Geography	1,082	0.8	17.9	40.3	40.9	0.0
Family Distribution by Income Level	50,963	22.9	16.7	19.0	41.4	0.0
Household Distribution by Income Level	85,318	25.8	15.4	16.0	42.8	0.0
Median Family Income MSA – 17020 Chico, CA MSA		\$56,914	Median Housing Value			\$225,491
			Median Gross Rent			\$921
			Families Below Poverty Level			13.1%
<i>Source: 2015 ACS Census and 2021 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>						

Scope of Evaluation in California

Column has only one AA, which consists of Butte County – Chico MSA. Refer to the table in appendix A for a description of the full-scope review.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Butte County – Chico MSA AA is good.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

Refer to Table Q in the state of California 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.

During the evaluation period, the geographic distribution of small loans by income category was reasonable for low- and moderate-income tracts. The bank originated approximately the same percentage of loans in low-income tracts compared to aggregate market data and the percentage of businesses in the low-income tracts. The bank originated a slightly lower percentage of loans to the moderate-income tracts compared to the percentage of businesses in the moderate-income tracts, but approximately the same percentage of loans compared to aggregate market data.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

Refer to Table R in the "MMSA" 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.

The bank's distribution of loans to businesses of different sizes reflects reasonable penetration given aggregate performance in AA. The bank originated a higher percentage of loans to businesses with revenues at or below \$1 million compared to the percentage of the aggregate number of reportable loans originated and purchased by all CRA-reporting lenders in the AA. However, the percentage of businesses with revenues at or below \$1 million is higher than both the aggregate percentage and the percentage of bank loans. Given this factor, the bank has a reasonable distribution as the bank's percentage of loans is higher than the aggregate percentage of loans.

Responses to Complaints

The bank did not receive any complaints related to CRA during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA. Performance related to community development activities had a positive effect on the bank’s rating in the state.

Community development is analyzed at the bank’s option. Column provided the OCC with information concerning community development loans.

Number and Amount of Community Development Loans

Refer to the Community Development Loans table below for the facts 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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Butte County – Chico MSA	2	100	\$350	100

The bank’s qualifying CD lending includes two working capital lines of credit to schools providing services to low- or moderate-income geographies or low-to-moderate income individuals. As there is a low level of educational attainment in the bank’s AA, efforts to support education demonstrates an adequate response to the community’s needs.

Appendix A: Scope of Examination

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 MSAs and non-MSAs 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”.

Time Period Reviewed:	01/01/19 to 12/31/21	
Bank Products Reviewed:	Small business loans Community development loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
California Butte County – Chico MSA	Full-scope	Includes the full Butte County.

Appendix B: Summary of MMSA and State Ratings

RATINGS: Column National Association	
Overall Bank:	Lending Test Rating:
Satisfactory	Satisfactory
MMSA or State:	
California	
Butte County – Chico MSA	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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 30th 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. Not all tables may be applicable depending on the scope of the evaluation.

- 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
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	
2021 Butte County AA	71	23,119	23.3	4,759	1.5	1.4	1.1	27.4	25.4	25.2	43.6	31.0	39.0	27.4	42.3	33.2	0.0	0.0	1.5	
Total	71	23,119	23.3	4,759	1.5	1.4	1.1	27.4	25.4	25.2	43.6	31.0	39.0	27.4	42.3	33.2	0.0	0.0	1.5	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

NORTHERN CALIFORNIA NATIONAL B (10000024626) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
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		
2021 Butte County AA	71	23,119	23.3	4,759	87.2	53.5	50.1	3.8	46.5	9.1	0.0		
Total	71	23,119	23.3	4,759	87.2	53.5	50.1	3.8	46.5	9.1	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

NORTHERN CALIFORNIA NATIONAL B (10000024626) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.