

**ANNUAL REPORT TO THE FIRSTIER BANK BOARD OF DIRECTORS  
CRA (COMMUNITY REINVESTMENT ACT)  
APRIL 2021 (as of 12/31/20)**

An analysis of the percentage of loans by number and by volume in our assessment area outside of our assessment area was completed. A comparison of year over year change by dollars and number of loans is below.

	<b>12/31/2020</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>	<b>2017</b>	<b>2016</b>	<b>2015</b>	<b>2014</b>
Gross Loan Volume	429,737,901							
Loan Volume in Area	340,375,363	79%	72%	71%	64%	56%	47%	36%
Loan Volume Out of Area	89,362,538	21%	28%	29%	36%	44%	53%	64%
No of Loans	2,187							
No of Loans in Area	1,964	90%	80%	85%	80%	85%	79%	82%
No of Loans Out of Area	223	10%	20%	15%	20%	15%	21%	18%

Part 345.11(b) states, “*Purposes.* In enacting the Community Reinvestment Act (CRA), the Congress required each appropriate federal financial supervisory agency to assess an institution's record of helping to meet the credit needs of the local communities in which the institution is chartered, consistent with the safe and sound operation of the institution, and to take this record into account in the agency's evaluation of an application for a deposit facility by the institution.”

This section identifies our obligation to service all communities within our designated assessment area. The annual review of the service to our assessment area also includes a review of those areas immediately adjacent to our assessment area to assess if any areas should be added to our assessment area. The evaluation process used by the FDIC and other federal regulators is largely dependent on the number of loans and not on the volume of loans. In fact, large loans are typically not considered to be a part of the review process to determine if all areas are being served. Therefore, it is the number of loans and the number of customers being served in each census tract that effectively decides whether we are serving each census tract as required by Part 345.

The Bank's assessment area is comprised of seven non-contiguous areas.

1. Kimball County, Nebraska where the main office is located. Kimball, Nebraska is located at the intersection of Highway 71 and Interstate 80 with exits at mile markers 20 and 22. This includes branch in Kimball, NE - Census Tract 9545.00.
2. All of Buffalo County (Census Tracts 9689.00 – 9697.00), the eastern portion of Dawson County (Census Tract 9680.00), all of Phelps County (Census Tracts 9670.00 – 9672.00), all of Kearney County (Census Tracts 9666.00 and 9667.00), and all of Harlan County (Census Tract 9642.00), all counties in Nebraska. The Nebraska branches in this assessment area are located in Elm Creek, NE – Census Tract 9690.00, Holdrege, NE – Census Tract 9670.00, and Kearney, NE – Census Tract 9697.00. Elm Creek, NE is just North of Interstate 80 at mile marker 257. Holdrege, NE is approximately 17 miles South of Elm Creek, NE. The Interstate 80 exit to the Kearney, NE branch is at mile marker 272.
3. All of Laramie County, Wyoming (Census Tracts 0002.00 – 0020.00 and 9808.01). The branch located in this assessment area is located in Cheyenne, WY – Census Tract 0014.02. Cheyenne, WY is located at the intersection of Interstate 25 and Interstate 80 which is approximately 7 miles North of

the Colorado border and 40 miles West of the Nebraska border.

4. All of Weston County, Wyoming (Census Tracts 9511.00 & 9513.00). The Bank's Upton, WY branch is located in this area. Upton, WY – Census Tract 9511.00 is located approximately 45 miles Southeast of Gillette, WY at the intersection of Highway 16 and Highway 116 in Northeast Wyoming.
5. All of Douglas County, Colorado (Census Tracts 0139.01, 0139.04, 0139.05, 0139.07 – 0139.11, 0140.01, 0140.05 – 0140.13, 0141.07 – 0141.10, 0141.12 – 0141.16, 0141.22 – 0141.40, 0142.02 – 0142.04, 0143.00, 0144.03 – 0144.06, 0145.03 – 0145.06, 0146.02 -0146.04). Castle Rock, CO – Census Tract 0145.04 branch is located in Douglas County, Colorado. Castle Rock, CO is located on Interstate 25 South of Denver & Castle Pines approximately 30 miles between Interstate 25 exit 181 and 182. The Castle Rock, Colorado branch is located at the intersection of Wilcox Street and 1<sup>st</sup> Street in Castle Rock, Colorado.
6. All of Weld County, Colorado (Census Tracts 0001.00 – 0003.00, 0004.01, 0004.02, 0005.01, 0005.02, 0006.00 – 0023.00, 0025.01 & 0025.02). Greeley, CO – Census Tract 0014.16 branch is located in Weld County, Colorado. Greeley, CO is located in the High Plains of northern Colorado about 25 miles east of the Rocky Mountains and north of Denver, Colorado. The Greeley, Colorado branch is located at the intersection of 63<sup>rd</sup> Avenue and W 10<sup>th</sup> St in Greeley, Colorado.
7. All of Broomfield County, Colorado (Census Tracts 0300.00 – 0314.00, 9801.00 – 9803.00). Broomfield, CO - Census Tract 0311.00 branch is located in Broomfield County, Colorado. Broomfield, CO is located half way between Boulder, CO and Denver, CO on Highway 36. The branch is just off Highway 36 on Wadsworth and 120<sup>th</sup> Avenue in Broomfield, Colorado.

Based on my analysis of the area we are currently serving it is my recommendation that we amend our Assessment Area to include Broomfield County, Colorado where the new Broomfield branch was opened on February 16, 2021. Although Broomfield County, Colorado was added to the Bank's assessment area in February 2021, the analysis of loans at the beginning of this report includes all assessment areas except the Broomfield County, Colorado assessment area.

Our Community Reinvestment Act Notice posted in each branch is in compliance with the regulation and used the model language provided in the regulation.

The Public Files will be updated prior to April 1, 2021.

A review of the HMDA-LAR (Home Mortgage Disclosure Act –Loan Application Register) shows no evidence of discrimination by race, sex, or income. The bank lending staff does consistently grade loan applicants and decisions are made based solely on credit-worthiness. All denials and withdrawals are reviewed by the bank Compliance Officer or other designee who constantly monitors for any evidence of suspected disparate lending practices.

The final HMDA data submission to the FFIEC HMDA Platform was made February 27, 2020 for the year 2019. The deadline for submission is March 1 of each year. Due to the change in the HMDA thresholds effective July 1, 2020, the threshold to report closed-end mortgage loans from 25 to 100 originated loans in each of the previous two years, and to report dwelling-secured open-end lines of credit from 100 to 200 originated lines in each of the prior two years have eliminated FirstTier Bank from currently reporting HMDA loans.

FirstTier Bank is considered to be an "Intermediate Small Institution" under the Community Reinvestment Act as of 12/31/20. Any bank with assets of at least \$330 million and less than \$1.322 billion as of December 31 of both of the prior two calendar years is considered to be an

Intermediate Small Bank (ISB). The record keeping requirements and CRA evaluations are significantly elevated for ISB banks.

Submitted by: *Jacqueline F Smith*