

**Baker Boyer Bank
Community Reinvestment Act
2020 Public File**

§228.43 Content and availability of Public File

(a) *Information available to the public:* A bank shall maintain a public file that includes the following information:

- 1) All written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping meet the community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law.

No written comments were received.

- 2) A copy of the public section of the bank's most recent CRA Performance Evaluation prepared by the Office of the Comptroller of the Currency. The bank shall place this copy in the public file within 30 business days after its receipt from the Office of the Comptroller of the Currency;

Please See Attached Copy of 2019 Performance Evaluation

- 3) A list of the bank's branches, their street addresses, and census tracks;

Washington: State Code 53

County	County Code	MSA Code
Walla Walla	071	47460
Benton	005	28420
Franklin	021	28420
Yakima	077	49420

Location	Address	Lobby Hours	Drive-thru hours	Census Tract
<i>Walla Walla Main Office</i>	7 W. Main St, Walla Walla, WA	Monday-Thursday: 9am-5pm; Friday: 9am-6pm	Monday-Thursday: 9am-5:30pm; Friday: 9am-6pm	9206.00
<i>Eastgate Branch</i>	1931 E Isaacs, Walla Walla, WA	Monday-Thursday: 9am-5pm; Friday: 9am-6pm	Monday-Thursday: 9am-5:30pm; Friday: 9am-6pm	9208.01
<i>Plaza Branch</i>	1530 Plaza Way, Walla Walla, WA	Monday-Thursday: 9am-5pm; Friday: 9am-6pm	Monday-Thursday: 9am-5:30pm; Friday: 9am-6pm	9206.00
<i>Wheatland Branch</i>	1500 Catherine St, Walla Walla, WA	Monday-Friday: 9am-12pm		9207.01
<i>Tri-Cities Branch</i>	1149 N Edison St, Suite A, Kennewick WA	Monday-Friday: 9am-5pm		0109.01
<i>Yakima Branch</i>	909 Triple Crown Way, Yakima, WA	Monday-Friday: 9am-4pm		0004.00

Oregon: State Code 41

County	County Code	MSA Code
Umatilla	059	9999

Location	Address	Lobby Hours	Drive-thru hours	Census Tract
<i>Milton Freewater Branch</i>	320 N. Columbia, Milton-Freewater, OR	Monday-Thursday: 9am-5pm; Friday: 9am-6pm	Monday-Thursday: 9am-5:30pm; Friday: 9am-6pm	9502.00

ATM Locations

<i>Walla Walla Main Office Branch</i> 16 S 2 nd Walla Walla, WA 99362	<i>Tri-Cities Branch</i> 1149 N Edison St Kennewick, WA 99336
<i>Plaza Branch</i> 1530 Plaza Way Walla Walla, WA 99362	<i>Eastgate Branch</i> 1931 E. Isaacs Walla Walla, WA 99362
<i>Milton-Freewater Branch</i> 320 N. Columbia Milton-Freewater, OR 97862	

- 4) 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 census tracts;

N/A

- 5) A list of Services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. At its option, a bank may include information regarding the availability of alternative systems for delivering retail banking services (e.g., ATMs, ATMs not owned or operated by or exclusively for the bank. Banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs);

Please refer to the attached Community Reinvestment Act Statement for details regarding bank services. The attached fee schedule is accurate as of March 2020.

- 6) A map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either in the map or in a separate list;

Please refer to the attached Community Reinvestment Act Statement for the map details. Our assessment areas are Walla Walla County, Yakima County, Benton County, and Franklin County located in Washington and Umatilla County, Oregon.

- 7) Any other information the bank chooses.

N/A

(b) Additional information available to the public

1) Banks other than small banks. A bank, except a small bank or a bank that was a small bank during the prior calendar year shall include in its public file the following information pertaining to the bank and its affiliates, if applicable, for each of the two calendar years:

- (i) If the bank has elected to have one or more categories of its consumer loans considered under the lending test, for each of these categories, the number and amount of loans:
 - (A) To low-, moderate-, middle-, and upper-income individuals;
 - (B) Located in low-, moderate-, middle-, and upper-income census tracts; and
 - (C) Located inside the bank's assessment area(s) and outside the bank's assessment area(s); and
- (ii) The bank's CRA Disclosure Statement. The bank shall place the statement in the public file within three business days of its receipt from the OCC.

OCC 2019 Public Disclosure included below

2) Banks required to report Home Mortgage Disclosure Act (HMDA) data. A bank required to report home mortgage loan data pursuant part 1003 of this title shall include in its public file

a written notice that the institution's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (CFPB's) website.

The Bank did not receive any requests to view the Disclosure Statements in 2019.

The Bank's Modified HMDA LAR and Disclosure Statements may be obtained from the Consumer Financial Protection Bureau's website: www.consumerfinance.gov/hmda

- Institution name: Baker Boyer National Bank
- LEI: 2549009AOX259OY87H37

3) *Small Banks.* **N/A**

4) *Banks with strategic plans.* **N/A**

5) *Banks with less than satisfactory ratings.* **N/A**

(c) *Location of Public Information.* A bank shall make available to the public for inspection upon request and at no cost the information required in this section as follows:

- 1) At the main office, and if an interstate bank, at one branch in each state, all information in the public file; and
- 2) At each branch:
 - (i) A copy of the public section of the bank's most recent CRA Performance Evaluation and a list of services provided by the branch; and
 - (ii) Within five calendar days of the request, all the information in the public file relating to the assessment area in which the branch is located.

(d) *Copies.* Upon request, a bank shall provide copies, either on paper or in another form acceptable to the person making the request, of the information in its public file. The bank may charge a reasonable fee not to exceed the cost of copying and mailing (if applicable).

(e) *Updating.* Except as otherwise provided in this section, a bank shall ensure that the information required by this section is current as of April 1 of each year. **Updated March 20, 2020**

BAKER BOYER BANK
COMMUNITY REINVESTMENT ACT STATEMENT
Adopted by Board of Directors March 2018

CRA Policy

Baker Boyer National Bank, headquartered in Walla Walla, Washington. Baker Boyer has seven banking locations in Washington and Oregon consisting of four branches in Walla Walla, one branch each in Yakima and Kennewick, Washington and in Milton-Freewater, Oregon. Baker Boyer National Bank is a full-service bank which is firmly committed to providing our community with a full range of quality products and services.

It is the policy of Baker Boyer National Bank to ensure proper adherence to the provisions and intent of the Community Reinvestment Act (CRA) in order that the goals of meeting the credit needs of the communities the Bank serves, including low and moderate income neighborhoods, are met. We are committed to serve our communities to the best of our abilities within the limits of our financial, physical, and staffing; paying heed to sound banking practices and our obligation to depositors and stockholders. The bank focuses on lending deposits locally to the people and communities within our lending area.

In order to ensure proper adherence to the provisions of the CRA, it is important to understand the methodology used by the Comptroller of the Currency, our bank regulator, for assessments of our performance. The bank receives positive consideration for home loans that we make to low- or moderate-income individuals within our primary market area (assessment area) as well as home loans made to individuals of all income levels that reside in specific census tracts within our assessment area where the median income for that tract is low or moderate.

In addition to the direct lending to individuals described above, the bank also receives positive consideration for community development loans, investments, and services. In the context of CRA, “community development” means loans, investments, or services that the bank provides to

- organizations or individuals that in turn provide affordable housing or other community services targeted to low- or moderate- income individuals
- small businesses or small farms (with gross revenues under \$1 million generally)

Nondiscrimination Policy Statement

It is the policy of Baker Boyer National Bank to fully and completely comply with the letter and spirit of all applicable federal and state consumer protection, civil rights, and fair housing laws and regulations. Each lending officer and bank employee is required to be knowledgeable of the requirements of all such laws and regulations affecting his or her job responsibilities, and it is the affirmative duty of each officer and employee to carry out their responsibilities at all times in a manner that complies with the requirements of all such applicable laws and regulations.

Baker Boyer National Bank's lending policies, procedures, and practices will not in any way

discriminate against any person on the basis of race, color, religion, national origin, sex, marital status, age (providing the applicant has the capacity to enter into a contract) or other prohibited basis. This policy of nondiscrimination covers all aspects of bank services including, in particular, the application for, consideration of, granting, servicing, and collection of extensions of credit.

Assessment Areas

Baker Boyer has 4 assessment areas consisting of 7 banking locations.

- Walla Walla County, WA; MSA 47460 *(4 locations)*
 - Main Branch –Downtown - offers retail banking, consumer lending services and D.S. Baker Advisor services, which includes trust, investment, family advising and commercial lending services
 - Plaza, Eastgate and Wheatland - retail banking branches
- Yakima County, WA; MSA 49420 *(1 location)*
 - Yakima DS Baker Advisor location
- Benton and Franklin Counties, WA; MSA 28420 *(1 location)*
 - Kennewick DS Baker Advisor location
- Umatilla County, OR; MSA 99999 *(1 location)*
 - Milton Freewater- retail banking branch

Technical Compliance

The Bank is in compliance with the Community Reinvestment Act. The Bank maintains a program to document its efforts to determine the community development, credit, investment, and service needs of our delineated community.

The Executive Vice President, Chief Banking Officer is charged with the management and documentation of the bank's CRA lending efforts and is responsible for the results of the CRA Lending Test score.

The Executive Vice President of Administration is charged with the management and documentation of the bank's CRA investment efforts and is responsible for the results of the CRA Investment portion of the Community Development test.

The CRA Officer provides consultation, guidance and assists in coordinating and documenting efforts to carry out the program.

The bank's lending area is defined generally as Walla Walla, Yakima, Benton and Franklin Counties, Washington, and Umatilla County, Oregon; as illustrated by the maps attached in Exhibit A. Occasionally, the Bank will extend credit to borrowers who do not reside in its established market areas; but such extensions of credit is limited.

This file, the bank's master Community Reinvestment Act public file is maintained by the Bank's CRA Officer and available on the bank's intranet, ("the vault") and is accessible by all employees.

CRA Strategic Program

Mission

Baker Boyer is a 150-year-old an independent community bank that is headquartered in Walla Walla, Washington. Our mission statement is "Family Legacies Grown Locally".

The bank believes in supporting the communities in which we operate through Community Development activities and through useful products and services. Our goal is to help grow, protect, and secure family legacies for generations. We originate loans, provide donations, purchase investments and render services that promote the betterment of our economies, community infrastructures, opportunities and education.

Objective

Baker Boyer's objective is to focus our community development activities that benefit the low-to-moderate income population within our assessment areas. We strive to work with community partners to identify opportunities that provide affordable housing or community services to low-to-moderate income individuals, as well as look for activities that promote economic development, stabilization or revitalization.

Additionally Baker Boyer seeks to empower individuals to break the cycle of low to moderate subsistence. It is a long term goal that will take careful investment into the education, health, and economic infrastructure in order to both create a new educated and healthy workforce while pairing them with careers in industries of the future that are attracted to our communities.

Vision

It is the vision of Baker Boyer to continually increase the economic vitality of the communities we serve in order to help everyone in the community increase their quality of life and economic circumstances. Baker Boyer's CRA Strategic Program focuses on identifying the immediate needs of our communities as well as to focus on long term solutions to current socio-economic disparities. This includes working with our community partners to find solutions for the immediate needs and to develop long term solutions such as education of motivated low to moderate income individuals in order to raise their long term economic potential. Baker Boyer also looks to alleviate health burdens of low to moderate income individuals that hinder their economic escalation.

Additionally to sustain a vibrant and sound economy with increasing prosperity, Baker Boyer continues to invest in other businesses and activities that add to the economic vitality of the communities we serve.

Types of Credit Offered by Baker Boyer National Bank:

Unsecured

When in the loan officer's judgment it is in the Bank's best interests to do so, we will lend on an unsecured basis to consumer customers. Because unsecured loans necessarily involve greater risks than secured loans, the following factors will be carefully considered by the loan officer in making the decision:

- a) Credit history
- b) Debt ratio
- c) Maximum loan
- d) Employment
- e) Ability to repay

Automobile Loans

Any loan in which an automobile or truck is used as collateral is classified as an automobile loan. The Bank continues to offer both direct loans to bank customers and dealer-originated loans.

Home Improvement Loans and Home Equity Lines of Credit

Home improvement loans and home equity lines of credit can be made for a variety of reasons including, but not limited to: additions to a home, air conditioning, heating, a new roof, remodeling, swimming pools, fences, landscaping, etc.; debt consolidation; or purchase of other assets. The Bank offers HELOCs with an open-ended term of ten years, after which becoming fully amortized based on a maximum of a 180-month term.

Stocks and Bonds as Collateral

Stock loans fall into two categories: those made to buy or carry margin stocks, and all other loans secured by stock. When the purpose is to buy or carry margin stock, the loan officer should refer to the Regulation U section of HPMS Volume 5 for additional guidance. For all other stock loans, compliance with this statement of policy is all the guidance needed.

Savings and Time Certificate of Deposit Loans

This type of loan is considered to be 100% secured and, when properly documented, is the safest loan a bank can make. These loans are secured by savings instruments held at Baker Boyer. The bank does not make loans against saving instruments at other institutions.

Mobile Home Loans

The Bank will finance mobile home purchases on a limited basis. The term for a new or used mobile home which year built is not more than 15 years, is limited to a 10-year maximum, with a down payment of not less than 40% of the purchase price.

Personal Equipment and Appliance Loans

This type of loan is most often given for the purchase of computers, kitchen appliances or small lawn or garden equipment. As these items depreciate rapidly the term is kept short.

Aircraft

Fixed-wing aircraft are good collateral; and, when properly made, loans usually pay as agreed.

Debt Consolidation Loans

Baker Boyer National Bank makes Debt Consolidation Loans.

Recreational Vehicle/Equipment Loans

This class of loan includes campers, camp trailers, travel trailers, stock/horse trailers, boats, motor homes, motorcycles and snowmobiles.

Commercial Lines of Credit

It is our policy to grant sound, short-term loans to local business customers that the Bank's resources permit and opportunity affords. This is a community responsibility as well as a sound and profitable banking practice. Short-term lines of credit may be unsecured or may be secured with, among other things, accounts receivable or inventory.

Agricultural Loans

Agricultural loans cover three basic areas: farm-operating lines of credit, livestock and equipment financing, and capital improvements.

Commercial Term Loans

Term loans are loans, not including qualifying real estate loans, with maturities greater than one year, which regularly amortize and which are typically repaid from the business' cash flow. The purposes for which the Bank makes term loans are illustrated by, but not limited to, the following:

- A. Expansion or modification of plant or equipment.
- B. Purchase equipment
- C. Refinancing a present debt.
- D. Replenishing working capital depleted by previous expansion.

Term Real Estate Loans

Real estate term loans are offered for custom construction, purchase and refinance, owner occupied, non-owner occupied; secured by a first lien on 1-4 family properties including condominiums, PUD, manufactured homes, primary and secondary residences under the following guidelines:

Residential:

- 1. Adjustable Interest rate products are available with different interval options.
- 2. Fixed interest rates are available with different loan terms.
- 3. Maximum maturity 30 years. Amortized in equal payments.
- 4. FHA/VA loans are available as allowed by our investor, for 15- & 30-year terms.

- a) The amount of a conventional loan will not exceed 97% of the appraised value or sales price of the property and improvements, whichever is less.
 - b) The amount of a FHA loan will not exceed 97.50% of the appraised value or sales price of the property and improvements, whichever is less.
 - c) The amount of a VA loan will not exceed 100% of the appraised value or sales prices of the property and improvements, whichever is less, except as allowed by VA to include the VA funding fee.
5. Conventional loans with a loan-to-value ratio that exceed 80% will require private mortgage insurance or other suitable collateral.
 6. FHA loans will be required to have One Time and Monthly Mortgage Insurance, as required by FHA.
 7. VA loans will be required to have a Funding Fee as required by VA.

Interim Real Estate Loans

Our bank's policy is to establish a portfolio which will assure fulfillment of the bank's responsibilities in (1) keeping its depositors' money safe, (2) earning sufficient income to provide adequate return on its capital, and (3) enabling our community and trade area to grow and prosper. The extension of interim loans is considered a proper form of commercial lending. Because this type of loan is generally very short and is paid when the project is completed, the Bank attempts to make loans of this type within the bounds of sound banking practice.

Land Loans

Land loans for purposes of developing property. Generally, the customer has to demonstrate that construction will go forward on the land within one year. Land loans are not made to speculators on the basis of hopes for future appreciation.

Second Mortgage Loans

Second mortgage loans are a proper loan for the Bank and often take the form of the home improvement loan discussed above.

Business Loans

Business loans are divided into four categories: operating lines of credit, loans for equipment purchased, for other capital improvement, and loans to new businesses partially guaranteed by the Small Business Administration.

Ready Credit/ODP (Overdraft Protection)

Ready Credit or ODP is a line of credit tied directly to a customer's checking account. This type of loan is available through the Installment Loan Department. It saves the customer overdraft charges by automatically transferring funds into their checking account to cover checks if their own funds do not. It has also become an excellent tool in helping the lower income and retired borrowers who may qualify for a small loan and can afford only a small minimum monthly payment.

Profile of Participation in Special Loan Categories:

Loan Analysis

As of December 31, 2019, the total Bank deposits were \$537,516 and total net loans were \$276,840; for a loan-to-deposit ratio of 51.50%. The loan portfolio mix for each quarter end of 2019 is as follows:

	Quarter 1 3/31/19	Quarter 2 6/30/19	Quarter 3 9/30/19	Quarter 4 12/31/19
Real Estate Loans	74.25%	72.20%	73.30%	74.42%
Commercial and other loans	22.17%	21.99%	20.98%	20.02%
Agricultural Loans	4.19%	6.53%	6.37%	6.12%
Installment Loans	1.67%	1.46%	1.55%	1.75%
LESS: Allowance for Loan Loss	(2.28%)	(2.19%)	(2.20%)	(2.31%)
	100.00%	100.00%	100.00%	100.00%
Loan to Deposit Ratio	51.90%	55.68%	53.66%	51.50%

12.44 % of our commercial loans are guaranteed by the Small Business Administration and 15.29% of our agricultural loans are guaranteed by the Farmer Service Agency.

EXHIBIT A

BAKER BOYER NATIONAL BANK - ASSESSMENT AREA CENSUS TRACTS

Walla Walla MSA 47460	Umatilla MSA 99999	Yakima MSA 49429	Benton MSA 28420	Franklin MSA 28420
9200.00	9400.00	0001.00	0101.00	0201.00
9201.00	9501.00	0002.00	0102.01	0202.00
9202.00	9502.00	0003.00	0102.02	0203.00
9203.00	9503.00	0004.00	0103.00	0204.00
9204.00	9504.00	0005.00	0104.00	0205.01
9205.00	9505.00	0006.00	0105.00	0205.02
9206.00	9506.00	0007.00	0106.00	0206.01
9207.01	9507.00	0008.00	0107.01	0206.03
9207.02	9508.00	0009.01	0107.03	0206.05
9208.01	9509.00	0009.02	0107.05	0206.06
9208.02	9510.00	0010.00	0107.07	0207.00
9209.00	9511.00	0011.00	0107.08	0208.00
	9512.00	0012.01	0108.03	9801.00
	9513.00	0012.02	0108.05	
	9514.00	0013.00	0108.07	
		0014.00	0108.09	
		0015.01	0108.10	
		0015.02	0108.11	
		0016.01	0108.13	
		0016.02	0108.14	
		0017.01	0109.01	
		0017.02	0109.02	
		0018.00	0110.01	
State: 53 County: 71	State: 41 County: 59	State: 53 County: 77	State: 53 County: 5	State: 53 County: 21

COMMUNITY DELINEATION:

Walla Walla, Yakima, Benton and Franklin Counties, Washington. Umatilla County, Oregon

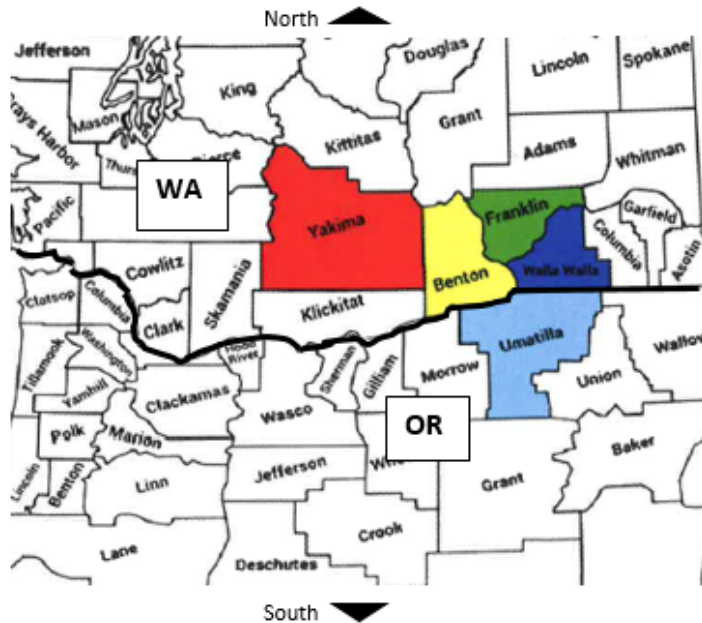


Exhibit B

COMMUNITY REINVESTMENT ACT NOTICE

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

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the OCC, and comments received from the public relating to our assessment area needs and opportunities, as well as our responses to those comments. You may review this information today by reviewing the public file which is available at www.bakerboyer.com.

You may also have access to the following additional information, which we will make available to you after you make a request to us: (1) A map showing the assessment area containing a select branch, which is the area in which the OCC evaluates our CRA performance for that particular community; (2) branch addresses and associated branch facilities and hours in any assessment area; (3) a list of services we provide at those locations; (4) our most recent rating in the assessment area; and (5) copies of all written comments received by us that specifically relate to the needs and opportunities of a given assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the banks that are scheduled for CRA examinations in that quarter. This list is available from the Deputy Comptroller, 1225 17th Street, Suite 300, Denver, CO 80202-5534. You may send written comments regarding the needs and opportunities of any of the bank's assessment areas to Cindy Dickson, CRA Officer, 7 West Main, Walla Walla, WA 99362 and Deputy Comptroller, 1225 17th Street, Suite 300, Denver, CO 80202-5534. Your comments, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Deputy Comptroller. You may also request from the Deputy Comptroller an announcement of our applications covered by the CRA filed with the Comptroller. We are an affiliate of Baker Boyer Bancorp, a bank holding company. You may request from the Federal Reserve Bank of San Francisco, 101 Market Street, San Francisco, CA 94105, an announcement of applications covered by CRA filed by bank holding companies.

Baker Boyer Bank

Regulation C, Home Mortgage Disclosure Act (HMDA)

Background and Summary

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975 to monitor residential mortgage lending practices of financial institutions. Financial Institutions must report information concerning loan originations, loans purchased, or loans sold during the year as well as data regarding loan applications that do not result in an origination, such as denials and withdrawals. The regulation requires institutions to report lending data to their supervisory agencies on a loan-by-loan and application-by-application basis by way of a “register” reporting format.

The purpose of HMDA is to:

- Provide the public with mortgage lending data that demonstrates whether a financial institution is serving the housing credit needs of its community;
- Aid public officials in distributing public-sector investments and attracting private-sector investments where needed;
- Assist examiners and others in identifying potentially discriminatory lending activities; and
- Aid regulators in enforcing anti-discrimination laws and regulations.

The Consumer Financial Protection Bureau (CFPB) implements HMDA. The Office of the Comptroller of the Currency (OCC) is required to assess the bank’s HMDA compliance during regular compliance examinations. The OCC also uses HMDA data to help determine the bank’s performance under the Community Reinvestment Act (CRA).

Policy

It is the policy of Baker Boyer Bank to comply with the Home Mortgage Disclosure Act and the requirements of Regulation C. The bank’s Loan Application Register shall be completed accurately and completely and updated no less frequently than thirty days after the end of the calendar quarter in which the final action (origination of loans, denial or withdrawn application) is taken. The bank has the option to include HELOCs and withdrawn pre-approvals in the HMDA Loan Application Register; at this time such loans will not be reported.

The bank’s completed Loan Application Register for each calendar year shall be filed with the CFPB prior to March 1st of the following year.

The HMDA data about the Bank’s residential mortgage lending is available online through the CFPB’s website. (<https://ffiec.cfpb.gov/data-publication/>). Institution name: Baker Boyer National Bank, LEI: 2549009AOX259OY87H37. The data shows geographic distribution of loans and applications; ethnicity, race, gender, age and income of applicants and borrowers; and information about loan approvals and declinations.

The Master Home Mortgage Disclosure Act public file will be maintained by the Compliance Department HMDA Officer. A notice of the availability of our HMDA data is displayed in each branch lobby.

Community Reinvestment Act

Baker Boyer Bank Employee Services 2019

CRA Qualified Services

[Bryan Ponti, Trust Advisor](#) – ***Christian Aide Center Board Member***. Primary purpose is to provide housing for homeless men, women and children. Also provided drug and alcohol treatment, mentorship, and parenting classes to aid the guests at the shelter. [Serving Walla Walla County 9 hours volunteered in 2019.](#)

[Brad Hansen, Trust Advisor](#) – ***Union Gospel Mission of Yakima- Planned Giving Advisory Board member***. The Advisory Board provides education to the valley about ways to give charitably to Union Gospel Mission through estate planning and other tax effective techniques. Completes articles for the newsletter for the Mission to discuss various topics on how to give, as well as putting on presentations in town to inform donors directly. [Serving Yakima County 6 hours volunteered in 2019.](#)

[Mitch Roach, VP Business Banking Advisor](#) – ***Habitat for Humanity Tri-County Partners, Family Selection Committee member***. Family Selection Committee member since August 2002. Habitat partners with low-income working families to provide affordable housing and our committee reviews the application files, does family visits to the homes of qualifying applicants and then makes a recommendation to the Habitat board regarding the decision of the applicant family. Habitat works in partnership with low-income working families, sponsors and communities to build and renovate decent, affordable housing. [Serving Benton, Franklin and Walla Walla Counties 15 hours volunteered in 2019.](#)

[Jolene Riggs, Controller](#)- ***School Based Health Center***. Geared to low-income students. Free to students. Health Centers in the schools: Blue Ridge, Wa-Hi, Pioneer Middle School, Lincoln High Alternative School. [Serving Walla Walla area 40 hours volunteered in 2019.](#)

[Elizabeth Humphrey, VP Business Advisor](#) - ***Board Commissioner of the Walla Walla Housing Authority***. The board and organization is set up to provide education to low and moderate income individuals, families, seniors, and Veterans on how to safely afford a house or rental as well as provide them with the house or rental. [Serving Walla Walla area 48 hours volunteered in 2019.](#)

Susie Colombo, VP Family Advisor – **Board member for the Providence St. Mary Foundation.** Raise money to support health care in the community, especially to low income people. Mission Statement: “As people of Providence, we reveal God’s love for all, especially the poor and vulnerable, through our compassionate service.” [Serving Walla Walla and Umatilla County 60 hours volunteered in 2019.](#)

Terri Lyford, VP Retail Banking Manager – **Walla Walla YWCA Board Member.** The YWCA serves women and children of domestic violence. Some Programs include: safe shelter housing, support groups, medical & legal advocacy, crisis line, safety planning, after school childcare program, day care facilities to low income families and more. [Serving the Walla Walla area 12 hours volunteered in 2019.](#)

Camille Snell, Trust Advisor – **Yakima YWCA Board Member.** The Yakima YWCA serves women and children of the Yakima Valley who need shelter from domestic violence. Support services are available to help the victims of domestic violence learn to cope and heal from the trauma they have experienced. The Yakima YWCA also offers a variety of programs to help women become independent. For instance, women can visit the Working Women's Wardrobe to select professional clothing for employment. In addition, there are a number of support groups available to women and children. Domestic violence is a major issue in Yakima, and the YWCA is working to help the victim’s transition to a healthy and peaceful life. [Serving Yakima 72 hours volunteered in 2019.](#)

Mark Hess, EVP COO – **Walla Walla Public School, Bond Committee.** 560 million dollar bond to improve 4 separate schools in the WW school district. Vice Chair of Bond Oversight Committee. [Serving Walla Walla County 30 hours donated in 2019.](#)

Jodi Venneri, VP CreditQuest Administrator – **YMCA.** Annual Campaign Fundraiser Committee member- supports membership scholarships for youth and families that have financial needs. . [Serving Walla Walla County 30 hours donated in 2019.](#)

JT Lieuallen, VP Trust Advisor – **Children’s Home Society Board Member.** CHS focuses on providing comprehensive services to children by providing a streamlined and cohesive support system for children and families to access various services that meet all their needs. Benefits at risk youth in Walla Walla Valley. [Serving Walla Walla County 65 hours donated in 2019.](#)

Cathy Schaeffer, Family Advisor – **Downtown Walla Walla Foundation, Board member.** Community development, developing and maintaining a comprehensive downtown revitalization strategy implementation a balance of activities in the areas of organization, promotion, design and economic vitality. This includes coordinating with local governments, business, and non-profit enterprises. Recent involvement includes advocating for the Evergreen Housing Development Group, which has agreed to add affordable housing units in the new apartments they plan to build in the downtown area. [Serving Walla Walla County- 6.5 hours volunteered in 2019.](#)

Stella Pederson, Trust Advisor – **Habitat for Humanity Tri-County Partners, Family Selection Committee member.** Family Selection Committee member since August 2002. Habitat partners with

low-income working families to provide affordable housing and our committee reviews the application files, does family visits to the homes of qualifying applicants and then makes a recommendation to the Habitat board regarding the decision of the applicant family. Habitat works in partnership with low-income working families, sponsors and communities to build and renovate decent, affordable housing. [Serving Benton, Franklin and Walla Walla Counties 3 hours volunteered in 2019.](#)

[Cindy Dickson, Compliance & CRA /HMDA Officer -MercyCorp Northwest, Walla Walla](#) **Microbusiness Program Oversight Committee Member.** Mercy Corp Northwest offers programs and opportunity to individuals without ready access to resources, providing hard working individuals and families an opportunity to break intergenerational cycles of poverty. [Serving Walla Walla County 10 hours donated in 2019.](#)

[Brad Hansen, Trust Advisor – Yakima County Development Association-Board Member.](#) Provide resources and funding for businesses looking to relocate to Yakima County or expand within the county. Provide resources and grant funding for certain infrastructure projects within Yakima County. Provide resources and funding for Business Plan Competition held within businesses in Yakima and surrounding counties. [Serving Yakima County 15 hours volunteered in 2019.](#)

[Stella Pederson, Trust Advisor – Benton Legal Aid Council- Board of Director Member.](#) meet monthly to review finances for BFLA, number of legal aid cases referred out to local attorneys for representation, number of low-income clients helped, coordinate communications to local organizations re: legal aid activities and purposes. The Board provides guidance and assistance to hired staff on legal issues, fundraising efforts, continuing legal education programs as fundraisers for legal aid. [Serving Benton and Franklin Counties 12 hours volunteered in 2019.](#)

[Jan Darrington, VP Family Advisor – Junior Achievement.](#) The mission of Junior Achievement is to inspire and prepare young people to succeed in a global economy. The programs are developed with a primary emphasis on entrepreneurship, financial literacy, and work readiness, while providing a strong secondary emphasis on mathematics, reading, and writing skills. Students learn fundamental business and economic concepts, explore career interests and opportunities, and develop work-readiness skills. [Serving Benton & Franklin Counties 2 hours donated in 2019.](#)

[John Keyes, Investment Professional– Junior Achievement.](#) The mission of Junior Achievement is to inspire and prepare young people to succeed in a global economy. The programs are developed with a primary emphasis on entrepreneurship, financial literacy, and work readiness, while providing a strong secondary emphasis on mathematics, reading, and writing skills. Students learn fundamental business and economic concepts, explore career interests and opportunities, and develop work-readiness skills. [Serving Walla Walla County 5 hours donated in 2019.](#)

[Kain Evans, VP, IT Director, Information Technology-Board Vice President of Valley Residential Services, Tech Committee Chair.](#) VRS provides supervised housing for developmentally disabled adults. [Serving Walla Walla County 80 hours donated in 2019.](#)

[John Cunnison, VP, Chief Investment Officer](#) – **Walla Walla Housing Authority Commissioner of the Board**. The board and organization is set up to provide education to low and moderate income individuals, families, seniors, and Veterans on how to safely afford a house or rental as well as provide them with the house or rental. [Serving Walla Walla 50 hours volunteered in 2019.](#)

[Peter Allen, EVP Asset Management](#)–**Providence St. Mary Hospital Community Ministry Board Chair (local governing board)**. The ministry board has delegated responsibility for the quality and community benefit aspects of the hospital providing health care to the Walla Walla region, specifically focused on the poor and vulnerable as stated in the mission of the organization. Raise money to support health care in the community, especially to low income people. Specific responsibilities include managing assets of the foundation. [Serving Walla Walla, Umatilla and surrounding Counties 180 hours volunteered in 2019.](#)

[Cathy Schaeffer, Family Advisor](#) – **Touchet School District Board of Directors, Board member**. The Touchet School Board is the elected authority for local school regulations, policy, programs, and procedures within the framework of state law. As board members, we are responsible for translating the educational ideals, values, and goals of the community into concepts of policy. We ensure goals are set to provide long-range planning for local education; the district budget is balanced; interests are protected; and that buildings and grounds are maintained. Monthly meetings, open to the public, as well as work sessions, public hearings, and regular events are the activities that comprise the bulk of volunteer service in this position as a Director on the Touchet School Board. [Touchet School District is located within Walla Walla County- 73 hours volunteered in 2019.](#)

[Jan Darrington, VP Family Advisor](#) – **Family Health & Wellness Foundation- Executive Member**. The Foundation provides funding to low-income families, i.e. free mammograms, sports physicals, incidental needs in long hospital stays. It also oversees an endowment specifically for low-income children between ages birth to 12 years old to assure they get appropriate health care. [Serving Walla Walla, Benton and Franklin Counties- 35 hours volunteered in 2019.](#)

[Cathy Schaeffer, Family Advisor](#) – **SE Area Technical Skills Center General Advisory Committee, Committee Member**. Career and Technical Education Advisory Committee volunteers help plan for our future workforce through advising, assisting, and providing support and advocacy for quality career and technical education (CTE) programs in regional Skills Centers. Quarterly meetings open to the public, as well as regular events such as volunteering for career/interview events are part of this Advisory Committee member role. By providing direction and guidance to administrators and teachers for the public school's CTE program, volunteer advisory committee members: Provide information to update, modify, expand, and improve the quality of career training programs and curriculum; and Support and strengthen the partnerships between business, labor, the community, and education. [Serving Walla Walla County School Districts- 18 hours volunteered in 2019.](#)

Teresa Larson, EVP, Strategic Manager- **YWCA Board Member**. "YWCA Walla Walla signature program is the Domestic Violence and Sexual Assault Resource Center: a domestic violence shelter, counseling, support groups, advocacy, information and more. Offering quality, licensed childcare programs and a number of community and personal enrichment programs." [Serving Walla Walla County 35 hours volunteered in 2019](#)

Lynn Foust, VP Senior Financial Advisor – **Helpline**. Organized annual fundraising luncheon. Helpline provides assistance for indigent and working poor individuals and families on an emergency basis with food, clothing, prescriptions, transportation, utilities, short-term shelter, homeless prevention, assistance, infant care needs and referrals for crisis advocacy and counseling. It also provides emergency food bank services for needy families and screen and voucher referrals for food services at three other area food banks. [Serving Walla Walla County 4 hours volunteered in 2019.](#)

Michelle Thacker, Internet and Banking Operations Manager – **Athena Weston School District Budget Committee, Board Member**. Served as Chairperson of the Board. Financial review of the projected year of all schools with final approval. [Serving Umatilla County 10 hours volunteered in 2019.](#)

Anna Duncan, AVP Consumer Loan Officer – **Walla Walla Association of Realtors Care and Share Food Drive, Committee Member**. Plan and organize food drive. The annual food drive distributes and collects donation bags from residences in the community. All collected food is donated to BMAC Food Bank. [Serving Walla Walla County 6 hours volunteered in 2019](#)

Other Community Services

Mark Kajita, President -**Mill Creek Coalition**. This coalition looks at strengthening the infrastructure of the Mill Creek Channel, and works with the City, County, Port, Downtown Walla Walla Foundation, the CTUIR, congressional delegations and the Army Corps of Engineers. [75 hours volunteered in 2019](#)

Alex Dill, Banking Operations –**Columbia County Fire Department, Volunteer**. Aided in Wildland Fires, Medical Calls, Structure Fires, and Emergency Calls. Serve the Community with Emergency Response Services, such as putting out fires (wildland and residential), Medical, and Car Accidents. [Serving Walla Walla County 44 hours volunteered in 2019](#)

Anna Duncan, AVP Consumer Loan Officer – **Walla Walla Association of Realtors Care and Share Food Drive, Committee Member**. Distribute and collect bags. The annual food drive distributes and collects donation bags from residences in the community. All collected food is donated to BMAC Food Bank. [Serving Walla Walla County 4 hours volunteered in 2019](#)

Cherylyn Hoerner, Loan Servicing – **Walla Walla Public Schools Music Boosters Organization**. Member of the board of the Boosters program that analyzes and financially supports the music students of all Walla Walla public schools. Approval and disbursement of budget and fundraising

annually to support additional items not covered by school funds. [Serving Walla Walla County 10 hours donated in 2019.](#)

JT Lieuallen, VP Trust Advisor –***United Way of Walla Walla, Fundraiser Committee.*** Served on committee to plan and host 5K fundraiser. [Serving Walla Walla County 15 hours donated in 2019.](#)

JT Lieuallen, VP Trust Advisor –***United Way of Umatilla/Morrow Counties, Fundraiser Committee.*** Served on committee to plan and host golf fundraiser. [Serving Umatilla and Morrow Counties 10 hours donated in 2019.](#)

JT Lieuallen, VP Trust Advisor – ***United Way of Walla Walla.*** Volunteer service includes reviewing financial reports, marketing materials, bylaw & legal review, education of board and staff regarding donor strategies, and physical labor. [Serving Walla Walla County 100 hours donated in 2019.](#)

Judy Hicks, VP, Consumer Loan Manager – ***Friends of Children of Walla Walla, Volunteer.*** Friends is a local non-profit mentoring organization that helps children in the Walla Walla Valley engage in safe, youth focused friendships with adults. Formed in 1999 to help prevent children from facing life's challenges alone, Friends remains committed to creating positive change in the lives of families one child at a time. [Serving Walla Walla County 90 hours volunteered in 2019.](#)

Elizabeth Humphrey, VP Business Advisor - ***Board Member for Shakespeare Walla Walla.*** Past president, Board Member and Grant writer. I provide financial knowledge and assistance to the board on all financial matters of the organization. I prepare budgets, and I write grants and seek funding for the various programs offered by the organization. The organization is the fiscal agent for the annual Dia de los Muertos Festival which reaches out into our local schools and Hispanic communities to bring them together in celebration of this Hispanic celebration and cultural event. School children are taught how to make masks and perform plays for the festival. Shakespeare WW also provides in-school teaching opportunities with its residency programs. This includes teaching an Anti-bullying program to 6th graders in Walla Walla, Dayton, Milton-Freewater, and other communities. Over 50% of the students in these schools receive reduced or no-cost lunches, indicating that many of them come from low-income families. [Serving Walla Walla area 120 hours volunteered in 2019.](#)

Josh Allington, EVP Chief Banking Officer- ***AWANA Youth Program.*** Youth Counselor for school aged children in grades 3-5. Services included 1 hour of physical activity in the gym involving the entire group. The last hour was spent on faith based counseling and discussion of bible verses. Children were of all faiths and all income backgrounds. [Serving Walla Walla County 50 hours volunteered in 2019](#)

Marianne Renick, VP Branch Manager – ***WW Sunrise Rotary, Board Member and Treasurer.*** Taking care of all financial needs of the club; Weekly recap/Weekly deposit of funds/weekly bills/Quarterly invoices and collection of dues/yearly tax. [Serving Walla Walla County 24 hours volunteered in 2019.](#)

[Lora Zink, AVP M-F Branch Manager](#) – ***Community Development Downtown Alliance, Member.***

Community Development - Build Community engagement and support for MF through community activities i.e. make a Difference Day, Cinco de Mayo Festival, Main Street Activities, etc. Economic Vitality - Partner with the City of MF to strengthen existing businesses and attract new businesses that will enhance the downtown economic base. [Serving Walla Walla County 40 hours volunteered in 2019](#)

[Rose Hajduk, Executive Assistant](#) – ***Friends of Children of Walla Walla.*** "The Friends ABC Program is a school-based mentoring program serving high need schools in Walla Walla and College Place. Adult volunteers in the ABC Program visit once a week with their young friend, with all visits occurring on school grounds during lunch time. Volunteers are rigorously screened and trained, and are matched with kids who have similar interests and hobbies. Whether the time is spent playing tag or coloring together, the half hour visits every week provide a consistent time and space the child can count on. This one-on-one time is a precious gift for children who are often lacking positive adult role. Both parents and teachers find that children who participate in the ABC Program are more likely that be successful academically and socially."- From Friend's Website. [Serving Walla Walla County 36 hours donated in 2019.](#)

[Rose Hajduk, Executive Assistant](#) – ***Walla Walla Valley Chamber of Commerce.*** Community and Business Development. Served as a Chamber Ambassador Secretary, attend monthly meetings to discuss promoting Walla Walla businesses. Take minutes at monthly meetings and distribute them to all the ambassadors. Assist with organization of monthly "Business after Hours", an event held at different chamber businesses where the business has a chance to tell people about their services. [Serving Walla Walla County 34 hours donated in 2019.](#)

[Brian Bruggeman, VP Financial Planning Manager](#) –***Walla Walla Community Hospice, Investment Committee.*** Walla Walla Community Hospice is a hospice care provider serving Walla Walla, WA and the surrounding area. Walla Walla Community Hospice offers care and emotional, social, and spiritual support for patients and their families in end-of-life scenarios. [Serving Walla Walla and Columbia Counties 2 hours volunteered in 2019.](#)

ACCOUNT ACCESS

Your Baker Boyer accounts come with the following features for ease of access and to keep you in control of your finances. If you would like more information, our Personal Bankers are available to talk with you about your financial goals.

ATM Card

Available for Checking and Savings accounts. For use at ATM machines only. Not used as a debit card.

VISA Chip Debit Card

Access your funds anytime, from anywhere. Baker Boyer Visa Debit Cards come with built-in chip technology for enhanced security, giving you greater fraud protection when you use your card at a chip-activated terminal.

ATM Deposits

Deposit cash and checks at any Baker Boyer ATM.

Online Banking

Access your accounts anytime with realtime updates and information. With Online Banking you can: check your balance, view account history, pay your bills, make transfers, and more.

Online Bill Pay

Pay your bills at your convenience or set up auto payments. Accessed through Online Banking.

E-Statements

View current and previous monthly account statements through Online Banking.

Remote Deposit

Scan checks remotely and transmit the check images to Baker Boyer for deposit. Available for Business accounts only.

24 Hour Phone Banking

Access your accounts by phone 24 hours a day. Check your balance, transfer funds, verify a credit or debit, or make a Baker Boyer loan payment. Available in Spanish. Call 509-522-2262 or 800-583-2265.

Text Banking

Available with Online Banking, Text Banking is a quick option that gives you access to your account history and balance with any text enabled phone.

Mobile Banking App

Access Online Banking using your mobile device. Available for iPhone and Android. With the app you can: check your balance, view account history, pay your bills, make transfers and more.

Mobile Deposit

Deposit checks from your mobile device using our Mobile Banking App. Must be setup with both Online Banking and Mobile Banking.

Direct Deposit

Your regular deposits can be setup to automatically deposit into your account. i.e. payroll checks, retirement disbursements, social security checks, and others.

Savings Overdraft Sweep*

Protects your checking account from being overdrawn. Overdraft sweep will transfer available funds from your savings account into your checking account in the event your checking account does not have sufficient funds to cover a transaction.

**Fees and limits may apply.*

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STATEMENT OF FEES

Any fees changed are effective 03/18/2019. Some fees may be subject to change without prior notice.

ACCOUNT & OTHER SERVICE FEES

Account Reconciling	\$50 per hour
ACH Auto Transfer Fee	\$5/transfer
ATM PIN Reset	no charge
ATM PIN Reset, Rush Request	\$60
ATM Transaction Fee	no Baker Boyer imposed fee
ATM/Debit Card Replacement Request	\$15
ATM/Debit Card Replacement Request, Rush	\$60
Bill Pay (business & personal)	no charge
Bill Pay (additional features for small businesses):	
BillPayperless (Invoicing)	\$9.95/mo
Direct Deposit	\$9.95/mo
BillPayperless/Direct Deposit Package	\$18.00/mo
Bond or Coupon Redemption	\$10 per envelope + postage
Cashier's Checks	\$5
Check Printing	varies
Collections, Incoming & Outgoing, Domestic	\$20
Collections, Incoming & Outgoing, Foreign	\$35
Copy of Check	no charge
Counter Checks (three per sheet)	\$3
Deposited Items Returned	\$6
Dormant Account Fee	\$5 per month
Early Account Closing (within 60 days)	\$25
Excessive Savings Account Withdrawals	\$5 each after 6*
Excessive Money Market Acct Withdrawals	\$5 each after 6*
Excessive Private Banking Svgs Withdrawals	\$5 each after 6*
Fax, Incoming or Outgoing	\$3 first page, \$1 thereafter
Foreign Currency (Buy or Sell)	\$20**
Foreign Draft Order	\$30
Garnishments/Levies	\$100
Image Checks Returned with Statements	no charge
Loose Coin Processing (Non-Customer)	15% of total
Night Depository, Key Replacement	\$30
Night Depository, Zipper Bag with Lock	\$20
Night Depository, Zipper Bag without Lock	\$10
NSF Item Paid/Returned	\$30
Maximum Daily Fee for NSF/OD on Personal Accounts	\$120
Notary Service	no charge
Overdraft Sweep Transfer from Deposit Acct (per day)	\$5

ACCOUNT & OTHER SERVICE FEES (continued)

Personal Check Cashing, Non-Customer	\$25
Research	\$50 per hour
Returned /Undeliverable Statement	\$5
Statement Replacement	\$5 each
Stop Payment / Alert Request	\$30
VISA Debit Card Int'l Transaction	1% of converted amount
Wire Transfers, Incoming	\$10
Wire Transfers, Outgoing (Domestic)	\$20
Wire Transfers, Outgoing (International)	\$70

OTHER ACCOUNT FEES FOR ANALYZED BUSINESS ACCOUNTS

Box Currency/Coin Wrappers	\$2.50 per box
Checks Paid	\$0.12
Currency Purchased/Deposited	\$0.05 (per \$100)
Deposited Items Returned	\$6
Deposits Posted	\$0.15
Fax Notification	\$3
Monthly Maintenance Fee	\$14
On-Us Items Deposited	\$0.08
Rolled Coin Purchased/Deposited	\$0.06 (per roll)
Special Statement Cutoff	\$2
Sweep Setup from Loan or Repurchase	\$10
Transit Items Deposited	\$0.08

SAFE DEPOSIT BOX RENTAL FEES

Size listed indicates height and width. Length for all boxes is 18". Fees are annual.

3" x 5"	\$25
5" x 5"	\$40
3" x 10.5"	\$50
5.5" x 10.5"	\$75
10" x 10"	\$120
11" x 10.5"	\$120
Lost Key	\$10
Drilling Fee	\$250 prepay
Late Fee (over 60 days)	\$5 per month

*Excessive withdrawal fee applies when the account exceeds 6 pre-authorized third party withdrawals per statement period (if not more than 31 days). If statement period is quarterly, 6 pre-authorized withdrawals are allowed per calendar month.

**Other fees may apply



PERSONAL ACCOUNTS

CHECKING ACCOUNTS	eSolutions	Regular	Merit (62+ years)	Interest
Opening Balance	\$100	\$100	\$100	\$5,000
Service Charge	No Monthly Service Charge After 3, 50¢ per check \$6 monthly fee for paper statements*	\$12 monthly service charge, waived with minimum daily balance of \$750	\$5 monthly service charge, waived with minimum daily balance of \$100	\$12 monthly service charge, waived with minimum daily balance of \$5,000
Other Account Fees	No Baker Boyer imposed fee for debit card & ATM transactions.			
Interest	N/A	N/A	N/A	Interest is earned daily & paid monthly on collected balance, if greater than \$5,000.

*There is a \$6 monthly service fee for eSolutions customers who choose paper statements. There is no charge for electronic statements which are available through Online Banking.

SAVINGS ACCOUNTS	Regular	Minor (under age 21)	Merit (62+ years)	Money Market Gold
Opening Balance	\$100	\$25	\$100	\$5,000
Service Charge	\$5 monthly service charge, waived with minimum daily balance of \$400	\$5 monthly service charge, waived with minimum daily balance of \$25	\$5 monthly service charge, waived with minimum daily balance of \$100	\$15 monthly service charge, waived with minimum daily balance of \$5,000
Other Account Fees	No Baker Boyer imposed fee for ATM transactions. Excessive savings account withdrawals \$5 each after 6**			
Interest	Interest is earned daily and paid quarterly on collected balance, if greater than \$400.	Interest is earned daily and paid quarterly on collected balance, if greater than \$25.	Interest is earned daily and paid quarterly on collected balance, if greater than \$100.	Interest is earned daily and paid monthly on collected balance. Rates are subject to change daily. Interest based on current ledger balance tiers.***

Regular, Minor, Merit, and Money Market Gold Savings accounts are limited to six pre-authorized transfers, checks to a third party, or automatic transfers (such as mortgage or insurance payments) per statement cycle. We reserve the right to not pay accrued interest if account is closed prior to payment date.

**Excessive withdrawal fee applies when the account exceeds 6 pre-authorized third party withdrawals per statement period (if not more than 31 days). If statement period is quarterly, 6 pre-authorized withdrawals are allowed per calendar month.

***Interest Balance Tiers

\$0 to \$24,999.99

\$25,000.00 to \$49,999.99

\$50,000.00 to \$99,999.99

\$100,000.00 to \$249,999.99

\$250,000.00 and over

All fees are accurate as of 10/1/2018 and are subject to change without prior notice. Also, please reference Baker Boyer's Statement of Fees.

Updated 10/2018



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PERSONAL LOANS & SERVICES

Because we're an independent, community bank, you can take advantage of our ability to offer specialized loan products that are modified to suit your purpose. The basic types of personal loans we offer are outlined here, but we encourage you to talk with a bank representative when considering a loan. It's likely we can find a way to get you the funds you need. You also benefit from local decision making, which means faster approval and processing. Plus, your questions and special requests for copies of documents or account information can be directed to a bank representative via a local phone call or a quick visit when you drop by your branch.

Personal Loans

Sometimes life offers unexpected opportunities. A chance to go back to school or the chance to finally purchase the perfect antique kitchen table and chairs. At other times, life can give us unexpected bills to pay—from medical bills to auto repairs. No matter what your reason or need, a personal loan may be just the financial tool you need. There's no need for collateral, and the rates are better than those on most credit cards.

Debt Consolidation

This personal loan helps you to package all, or most, of your debt. If you are currently making payments on a couple of credit cards, a car loan, and various other revolving accounts, you may be paying too much in interest. Most revolving accounts charge from 18% to 21% interest and other types of loans may charge as much as 28% interest. By consolidating some or all of these loans and accounts into one personal loan, you could increase disposable income—because you would make one affordable monthly payment rather than several—and you may pay less in interest costs.

Ready Credit

Using your Ready Credit is as easy as writing a check. It's your personal line of credit that complements your checking account. It's a form of overdraft protection, as well as being available for unexpected needs or opportunities. And the rate and fee are better than those of most credit cards.

Auto Loans

Whether you're in the market for a new or used car, our flexible auto loans may be just what you need. Often times, the interest rate is lower than it would be when getting a loan directly from a dealer. Our advisors can help you determine the value of your trade-in and can also pre-approve your loan prior to your actual purchase.

Recreational Vehicle Loans

From boats to campers, jet skis to snowmobiles, and motorcycles to 4-wheelers, we have a loan to help purchase that vehicle you can't live without. You'll find that our interest rate may be lower than what a dealer will offer you and we have various repayment terms.



HEALTH SAVINGS ACCOUNTS

Health Savings Accounts (HSAs) allow you to pay for current health expenses and save for future medical expenses on a tax-free basis. HSAs are established as Money Market Savings account types.

Baker Boyer Bank Fees:

- Data Processing/Establishment Fee of \$25 and \$2 per month service charge.
- Minimum Opening Balance -\$100.

Additional Fees Include:

- Excess Contribution Fee (per occurrence)-\$20
- Mistaken Distribution Fee (per occurrence for amounts over \$50)-\$20
- Tax-Correction Fee (non-bank error)-\$50
- Transfer to Other Bank Fee-\$20

Note: Baker Boyer will generally return an item overdrawing an HSA, as this account type requires available funds for use. Exceptions will be handled on a case-by-case basis.

Client Responsibility - Keep track of IRS guidelines for qualified medical expenses, the balance in the HSA, contribution limits, and distributions completed.

Employer Responsibility - Employers who make contributions to HSAs on behalf of employees are responsible for monitoring contributions, satisfying comparability rules, determining whether employer contributions will be forwarded to one or more financial organizations, and reporting employer contributions to employees and the IRS.

Financial Institution Responsibility

- For individuals under age 55, financial organizations must not accept annual contributions that exceed the maximum contribution amount in effect for the year (\$6,900 for 2018 and \$7,000 for 2019)
- For individuals who attain age 55 by the end of the calendar year, financial organizations must not accept annual contributions that exceed the maximum contribution amount in effect for the year, plus the catch-up contribution dollar amount (\$7,900 for 2018 and \$8,000 for 2019)
- Report to the client and IRS: 1099-SA-HSA Distributions, 5498-SA-HSA Contributions or Rollovers, Fair Market Value Statement-Reports end-of-year balance and includes all reportable contributions and distributions ***The FMV Statement is not an IRS requirement, but rather an extra service Baker Boyer Bank provides for HSA clients.***

Contribution limits depend on Self or Family Coverage

- 2018-Self-Only \$3,450 w/ Catch-up of \$1,000 (Age 55+)= \$4,450 and Family \$6,900 w/ Catch-up of \$1,000 (Age 55+)= \$7,900
- 2019-Self-Only \$3,500 w/ Catch-up of \$1,000 (Age 55+)= \$4,500 and Family \$7,000 w/ Catch-up of \$1,000 (Age 55+)= \$8,000

Interest Earnings- Interest is earned daily and paid monthly on collected balance. Rates are subject to change daily. Interest based on current ledger balance tiers.

\$0 to \$24,999.99 | \$25,000.00 to \$49,999.99 | \$50,000.00 to \$99,999.99 | \$100,000.00 to \$249,999.99 | \$250,000.00 and over

Employers and Employees Making Contributions

- Any HSA contributions, other than current year, require special handling by a bank employee to ensure the transaction is reported appropriately.
- All HSA contributions completed using Online Banking report as current year only.
- Any medical reimbursements received that were originally paid using HSA funds must be handled by a bank employee to ensure correct reporting.

IRS Info

- IRS Publication 969-Health Savings Accounts and Other Tax-Favored Health Plans
- IRS Publication 502-Dental and Medical Expenses, the instructions to IRS Form 8889, and the IRS's website www.irs.gov

Updated 1/2019



HOME LOANS & SERVICES

Whether you're building a home, buying a home, or refinancing an existing mortgage, we've got a home loan product that can help you accomplish your goal. As an independent, community bank, our decisions and servicing are done locally—which means that in addition to faster approval and processing you work directly with the people you need to find solutions. At Baker Boyer, we offer a variety of home loan services and the ability to modify products to suit your individual needs. Please talk to any bank representative about your plans so we can provide the information you need to make the choice that's best for you.

Home Loans

Whether you're buying your first home or building a new one, a house represents a huge investment. That's why we take extra care to provide you with information and advice, as well as options that meet your financial goals. We'll help you determine a price range that keeps your payments where you want them, and you can choose from various repayment terms and a fixed or variable interest rate. The following page contains our 12-point checklist that can help you prepare for application requirements.

FHA & VA Loans

If you're a veteran or a first time home buyer, our FHA or VA loan products may be right for you. These loans offer flexibility and low minimum payments. For those who might not qualify for conventional home loans, FHA and VA loans are great alternatives.

Home Equity Loans

If you have established equity in your home—and you probably have if you've owned your home three or more years—a home equity loan can help provide the cash you need for other purposes. Borrow up to 80% of the value of your home and use the funds for anything you wish. With various repayment terms and potential tax advantages, this loan could be just what you need.

Home Equity Line of Credit

Whether you have a specific need, project, or purchase, or you simply want the comfort of knowing you have access to extra cash, a home equity line of credit is a great choice. As a revolving line of credit, it's there whenever you need it. Interest is only accrued on the amount of money you actually use, and that interest may even be tax deductible (consult your tax advisor). Approval time is fast—usually in one day—and access is easy, either by Home Equity check, telephone request, request by mail, or in person. You can also transfer funds using 24 Hour Phone Banking or Online Banking.

Refinancing

Although this loan is basically the same as a conventional home loan, it can be a valuable tool for accomplishing your goals. Whether you wish to take advantage of better interest rates, or you want to move your loan from another financial institution, we can help. With flexible terms and your choice of variable or fixed interest rate, we've got the options you need.

Construction Loans

When building a new home for your family, Baker Boyer is a great place to start. You can work directly with a loan officer who has experience in construction and can assist you all the way—from the initial planning stage to completion of your project. Once complete, we will work on updating your file for the end and final amortizing loan.



HOME LOANS & SERVICES

Modular Homes & Land Loans

We can develop a loan package that covers everything from the purchase of land for your manufactured home, to site preparations like car port, foundation, and digging a well. From the purchase of your home, to final setup, we're with you all the way. Choose from various repayment terms. Most of our loans remain right here, which makes adjustments and servicing convenient for the life of your loan.

Escrow Services

Escrow accounts provide a safeguard in the administration of private contracts between a buyer and seller. Whether you're the buyer or seller, if you're involved in a private sale contract, our Escrow staff can be a valuable partner. Our services are designed to help your transaction go smoothly and to provide complete, timely, and accurate records.

Application Checklist

To expedite processing, bring the following information with you when you apply for your home loan:

- Accepted purchase and sale agreement with any amendments or counteroffers signed by all parties.
- Names and addresses of all employers for the previous two years.
- Annual gross salary, last year's Form W-2, and most recent payroll voucher.
- If self-employed, copies of your federal income tax return for the previous two years. If employed by your own corporation, copies of its returns for the previous two years and a year-to-date profit-and-loss statement.
- If you choose to use your Social Security, disability, or pension income, bring a copy of a check or award certificate from the issuing agency.
- Names and addresses of banks or credit unions in which you have accounts, including account numbers and balances.
- List of all stocks, bond, certificates of deposit, and all other securities showing current market value, recent monthly and/or quarterly statements, account numbers, etc.
- Life insurance: list issuing company's name and policy number showing face amount and cash value less outstanding loans (if being used for down payment).
- Real estate owned: list address, current market value, original loan amount, and current balance owing for any real estate owned, with the account number for each property. Provide same information for previously owned and paid off real estate, to verify net proceeds on sale of property.
- Complete list of all obligations including installment loans, student loans, department store balances, and credit card balances.
- If you have been a party of any legal proceeding, be prepared to provide a copy of any documents showing evidence of your rights to additional income or obligation of additional payments resulting from the action.
- If you have had any credit concerns (e.g. bankruptcy, foreclosures, repossessions), be prepared to provide a copy of any documents showing the outcome of the proceedings.

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BUSINESS FINANCING

LINES OF CREDIT

Manage your cash flow more effectively with a line of credit that you can access instantly. Our rates are very attractive and, in many cases, your line is available to pay down and use again as you need to.

COMMERCIAL REAL ESTATE CONSTRUCTION LOANS

Our Business Advisors will work side by side to help you complete your construction with a loan program that meets your needs. We also offer term options with monthly payments that work for you. Let us help you get your next project off the ground.

COMMERCIAL REAL ESTATE LOANS

We're experts in the commercial real estate area, and that means we'll put the most prudent package together for you, taking into consideration your entire financial picture. Whether you're purchasing, refinancing, or doing a land development project, our monthly payment plans are cash flow friendly.

AGRICULTURAL LOANS

We provide farmers the flexibility to borrow what they need, when they need it. Payments are usually made annually, as opposed to monthly terms that fit best into a farmer's financial picture.

TERM LOANS: EQUIPMENT PURCHASE AND BUSINESS EXPANSION

Finance that new truck, computer system, company vehicle, or business expansion and replenish your cash flow. Whether your expansion includes brick and mortar, new technology, or supporting new markets, bring your business plan to us and we'll show you how we can help grow your legacy.



BUSINESS ACCOUNTS

CHECKING ACCOUNTS	eSolutions	First Step Business	Business Account Analysis*	Interest Business
Opening Balance	\$100	\$100	\$100	\$5,000
Service Charge	No Monthly Service Charge After 3, 50¢ per check \$6 monthly fee for paper statements*	\$12 monthly service charge, waived with minimum daily balance of \$2,500	monthly service charge based on account analysis, starting with \$14 base monthly service charge	\$15 monthly service charge, waived with minimum daily balance of \$5,000
Other Account Fees	No Baker Boyer imposed fee for debit card & ATM transactions.	50¢ per posted check (in excess of 25); 30¢ per deposited item (in excess of 50)	see above	50¢ per posted check (in excess of 25); 30¢ per deposited item (in excess of 50)
Interest	N/A	N/A	N/A	Interest is earned daily & paid monthly on collected balance, if greater than \$5,000.

*There is a \$6 monthly service fee for eSolutions customers who choose paper statements. There is no charge for electronic statements which are available through Online Banking.

SAVINGS ACCOUNTS	Business Savings	Business Money Market Gold
Opening Balance	\$100	\$5,000
Service Charge	\$5 monthly service charge, waived with minimum daily balance of \$400	\$15 monthly service charge, waived with minimum daily balance of \$5,000
Other Account Fees	No Baker Boyer imposed fee for ATM transactions. Excessive savings account withdrawals \$5 each after 6**	
Interest	Interest is earned daily and paid quarterly on collected balance, if greater than \$400.	Interest is earned daily and paid monthly on collected balance. Rates are subject to change daily. Interest based on current ledger balance tiers.***

*Analyzed Account

Earnings Credit—All collected funds in your Business Checking account earn a credit which is used to reduce your monthly service charge. This credit is derived by applying earnings credit to your daily collected balance after a 15% reserve requirement has been deducted. This earning rate is the same as the monthly average of the discounted 90-day Treasury Bill rate and is subject to change on the last day of each month.

Uncollected Funds—If checking withdrawals are made faster than incoming checks are collected, you are in effect using bank funds. For this service, a fee is assessed for uncollected funds using the monthly average of the 90-day Treasury Bill rate plus 4%. This rate is subject to change on the last business day of each month. When your charges exceed the earnings credit, the amount results in a service charge being applied.

**Excessive withdrawal fee applies when the account exceeds 6 pre-authorized third party withdrawals per statement period (if not more than 31 days). If statement period is quarterly, 6 pre-authorized withdrawals are allowed per calendar month.

Savings accounts are limited to six pre-authorized transfers, checks to a third party, or automatic transfers (such as mortgage or insurance payments) per statement cycle. We reserve the right to not pay accrued interest if account is closed prior to payment date.

***Interest Balance Tiers

\$0 to \$24,999.99
 \$25,000.00 to \$49,999.99
 \$50,000.00 to \$99,999.99
 \$100,000.00 to \$249,999.99
 \$250,000.00 and over

All fees are accurate as of 10/01 and are subject to change without prior notice. Also, please reference Baker Boyer's Statement of Fees.

Updated 10/2018



(509) 525-2000 | (800) 234-7923

WWW.BAKERBOYER.COM

MEMBER FDIC | EQUAL HOUSING LENDER



EXECUTIVE ACCOUNT

An account to reward our valued clients...

The Baker Boyer Executive Account is designed expressly for the personal needs of business owners and members of their senior employee team, as well as D.S. Baker Advisors clients. With preferred features, it provides account holders with interest on balances over \$1,000, two NSF fees waived annually, no minimum balance or domestic ATM fees, and a personal line of credit at New York Prime.

Executive Checking

- No minimum balance or service charges
- Interest earned on collected balances of \$1,000 or more daily
- Free checks as long as you continue to qualify for this account
- Preferred Courtesy Overdraft limit of \$1,000
- No-fee Executive Ready Credit* at New York Prime
- 2 NSF fees refunded annually
- Executive Account Visa® Debit Card
 - No monthly or annual card fees
 - Baker Boyer Bank will pay all fees charged at any ATM in the U.S.
 - Special Minimum Limits: ATM \$1,000 and POS \$5,000
- Free Online Banking and Bill Pay
- Free eStatements online – includes checking activity and check images
- Free Cashier's Checks

Executive Personal Loans

- One time credit of \$500 applied to primary or secondary residence mortgage fees
- Executive Personal Line of Credit*
 - Rate at New York Prime[†]
 - No annual fees

Qualifications

- Maintain primary business checking account with Baker Boyer
 - Business Loan relationships without business checking do not qualify for Executive Account
- Business Checking (excluding First Step Business Checking) with Business Online Banking Services or standard Online Banking services (i.e. without ACH or wires)*
- Enrollment in Online Banking for your new Executive Checking
- Offered to:
 - Business Owners (up to two senior employee team members), and
 - D.S. Baker Advisors clients.

*credit standards apply

[†]variable daily with a floor of 7%

04/15





Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

August 5, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Baker Boyer National Bank
Charter Number 3956

7 West Main Street
Walla Walla, WA 99362

Office of the Comptroller of the Currency

101 Stewart Street, Suite 1010
Seattle, WA 98101

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 Lending Test rating is based on a combination of the Washington (WA), and Oregon (OR) ratings. Performance in the Walla Walla assessment area (AA) in WA is weighted most heavily because it represents the bank's primary trade area with 58 percent of branch locations, 78 percent of total deposit volume as of June 30, 2018, 37.9 percent of commercial loans originated or purchased, and 80.3 percent of mortgage loans originated during the evaluation period.
- The Community Development (CD) Test rating is based on a combination of the WA and OR ratings. Performance in the CD Test was weighted in the same manner as the Lending Test.

Loan-to-Deposit Ratio

Baker Boyer National Bank's (BBNB) average Loan-to-Deposit (LTD) ratio is reasonable given its size, financial condition, and AA credit needs. We calculated the average LTD ratio over the prior 11 quarters since our prior June 2016 CRA Evaluation. BBNB's average LTD ratio was 52.4 percent over this period. In addition, BBNB engaged in secondary market sales of residential loans. Over the loan review period, BBNB sold \$55.6 million of residential loans to Federal Home Loan Mortgage Corporation. This represents 20.7 percent of total loans originated.

We compared BBNB's performance with five peer banks operating in the same general regions of the states of WA and OR. Each comparable bank operates in at least one of BBNB's AAs. The comparable banks range from \$313.8 million to \$1.8 billion in total assets, with an average size of \$689.5 million. Four of the banks were smaller than BBNB, the largest of which had \$467.8 million in total assets. The average LTD ratio of the comparable banks was 67.6 percent. Based on these averages and the level of secondary market sales, BBNB's average quarterly LTD ratio is reasonably close to that of similarly situated financial institutions and meets the standard for satisfactory performance. The table below illustrates BBNB's average LTD ratio compared to similarly situated institutions.

Baker Boyer National Bank		Similar Institutions	
Average LTD Ratio	52.4	Average LTD Ratio	67.6
High LTD Ratio	55.3	High LTD Ratio	88.8
Low LTD Ratio	42.3	Low LTD Ratio	48.0

Lending in Assessment Area

BBNB originated a substantial majority of its loans within the designated AAs. Based on our loan sample and the Home Mortgage Disclosure Act Loan Application Register (HMDA LAR), the bank

originated 92.3 percent of residential mortgages and 90.5 percent of commercial loans within its AAs by number, and 91.5 percent by dollar volume. The table below shows the bank's lending volume by year inside and outside its AAs for home mortgages and commercial loans.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
July 1, 2016-December 31, 2016	104	98.1	2	1.9	106	21,807	95.9	932	4.1	22,739
2017	149	90.9	15	9.1	164	31,671	89.6	3,683	10.4	35,354
2018	94	88.7	12	11.3	106	23,445	83.8	4,535	16.2	27,980
Subtotal	347	92.3	29	7.7	376	76,923	89.4	9,150	10.6	86,073
Business Loan Sample										
July 1, 2016-December 31, 2016	47	92.2	4	7.8	51	14,187	90.6	1,472	9.4	15,659
2017	117	89.3	14	10.7	131	25,841	89.5	3,022	10.5	28,863
2018	113	91.1	11	8.9	124	44,637	90.7	4,597	9.3	49,234
Subtotal	277	90.5	29	9.5	306	84,665	90.3	9,091	9.7	93,756
Total	624	91.5	58	8.5	682	161,588	89.9	18,241	10.1	179,829

Description of Institution

Baker Boyer National Bank (BBNB) first opened in 1869 and received a national charter in 1889. BBNB is the oldest bank in the state of WA. The bank is a wholly-owned subsidiary of Baker Boyer Bancorp. BBNB is headquartered in Walla Walla, WA and operates seven branch offices in two states. The bank's primary lending focus is on commercial loans and residential real estate loans for individuals. The bank also has a significant level of trust and asset management operations, with income from these activities representing approximately 24.9 percent of adjusted operating income as of December 31, 2018. BBNB had \$1.1 billion in fiduciary assets as of June 30, 2019.

BBNB has two rating areas for the states of Washington, and Oregon. Within the state of Washington, BBNB has three AAs, Walla Walla, Kennewick, and Yakima. In Oregon, the bank's only AA is Milton-Freewater. BBNB has three branch offices located in Walla Walla, WA, and one each in Kennewick, and Yakima, WA and one in Milton-Freewater, OR. The bank has automated teller machines located in three of the Walla Walla branches, and one in the Milton-Freewater and Kennewick branches. The Yakima and Kennewick branches primarily focus on trust, private banking, and commercial services. The Yakima and Kennewick branches were originally established as trust offices. The Yakima and Kennewick branches do not currently have a loan officer on site; however, should a trust customer require one, they will send someone out to the branch location from Walla Walla. Three of the Walla

Walla branches and the Milton-Freewater Branch rely on the downtown Walla Walla branch for trust and loan services.

As of June 30, 2016, BBNB had total assets of \$581 million and equity capital of \$56.7 million. Total loans represented 49.2 percent of total assets. The largest loan segment is for business loans, which include commercial, commercial multifamily, and construction and development loans. Business loans make up 58.9 percent of the loan portfolio. Commercial multifamily is the largest segment with 36.8 percent of the portfolio. The bank also has 27.0 percent of their portfolio in residential lending. The following table shows the loan portfolio composition as of June 30, 2016.

Table 1 – Baker Boyer National Bank Loan Portfolio Composition as of June 30, 2019		
Loan Type	Amount (\$000)	% of Loan Portfolio
Consumer	9,676	3.3
Construction and Development	4,572	1.6
Farmland/Agriculture	34,009	11.6
Residential Mortgages (senior and junior liens)	79,117	27.0
Residential Construction	226	0.0
Commercial and Industrial	60,049	20.5
Commercial Real Estate/Multifamily	107,697	36.8
Other	1,448	0.5

*Source: June 30, 2019 Call Report. Due to rounding, totals may not equal 100.0
Residential construction loans may be considered as mortgages or business loans depending on HMDA status.*

There are currently no legal, financial, or other factors that prevent BBNB from meeting the credit needs of their community. The bank was rated ‘Satisfactory’ as of the most recent CRA performance evaluation dated June 30, 2016. Please refer to the CRA public file for additional information regarding the bank.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank’s CRA performance was evaluated under the Intermediate Small Bank (ISB) criteria. We reviewed home mortgage loans and small loans to businesses for the period beginning July 1, 2016, through December 31, 2018. The scope of this examination included a review of loans originated within the assessment period. Primary products were chosen by outstanding loans made by the bank. Newly originated loans did not differ significantly from outstanding loan quantities.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For the 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. 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 vast majority of the bank’s activity is centered around Walla Walla, WA. There has been growth in Umatilla, and Benton-Franklin; however, the majority of the bank’s lending activity remains centered around Walla Walla due to both the Yakima, and Benton-Franklin branches having been created solely to service the BBNB’s trust department. As such, the greatest weight is given to Walla Walla, but the other AAs will factor into the BBNB’s overall rating.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA 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 Washington

CRA rating for the State of Washington: 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 evaluation period lending activity in the Washington AAs reflects reasonable penetration among businesses of different sizes and among individuals of different income levels.
- The bank's evaluation period lending activity reflects reasonable dispersion among geographies of different income levels in the Washington AAs.
- The bank has demonstrated adequate responsiveness to the community development (CD) needs of the Washington AAs.

Description of Institution's Operations in Washington

Three of the bank's 4 AAs are located in the state of Washington. The bank's headquarters, and the majority of its operations are located within the Walla Walla AA, which consists of the entirety of Walla Walla County. Walla Walla County is one of 2 counties that comprise the Walla Walla, WA MSA. In addition to its headquarters, the bank maintains three branches in Walla Walla. The other AAs in Washington are Yakima County and the combined counties of Benton and Franklin. These counties comprise the entirety of their respective MSAs: Yakima, WA and Kennewick-Pasco-Richland, WA. The bank operates one branch in the city of Yakima, and one branch within the tri-cities area of WA.

Walla Walla AA

The Walla Walla AA, which is comprised of the entire county of Walla Walla, is located in southeast Washington. Walla Walla County is bordered to the north by Franklin County (along the Snake River), to the west by Benton County (along the Columbia River), and to the east by Columbia County. The county's southern boundary forms part of the Washington-Oregon border across which is the Umatilla AA.

Data compiled by Moody's Analytics indicates that the Walla Walla AA has seen steady growth since 2018. Job growth and average hourly earnings have improved as the labor market has tightened. The housing market has experienced a relatively slow rise in prices. The unemployment rate was 4.5 percent in 2018, down from 5.8 percent in 2012. The unemployment rate peaked at 8.0 percent in 2010. Manufacturing and agricultural goods have driven economic performance in recent times. The long-term economic prospects are projected to be modest and below the U.S. national average. A key driver of this forecast is the decline in manufacturing, and low level of educational attainment.

According to information from the Washington State Economic Security Department, the largest sectors of the economy are health care, retail trade, service industry, agriculture and government services. Over 90 percent of the workforce is employed in these sectors. Government, healthcare, and agriculture employed 20.4 percent, 16.0 percent, and 12.9 percent of total employment, respectively. Tourism and wine production are also important to the local economy. Over 100 wineries exist in the Walla Walla Valley. Total covered employment for 2017 was 27,314 in Walla Walla County with an average annual wage of \$42,998. Average wages were up 4.2 percent from 2016. The local average annual wage is significantly below the state average of \$62,077. The state continues to expect construction, manufacturing, retail trade, warehousing, healthcare and education to drive growth over the next five years. The 2017 population in Walla Walla was 60,338. The population grew at a relatively slow rate of 3.0 percent from 2010 to 2017, which is significantly lower than the statewide growth rate of 10.1 percent.

The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2018 shows that eight commercial banks operate in Walla Walla County. Two of these banks capture 81.98 percent of the local deposit market. Banner Bank has the highest market share of deposits at 38.8 percent, followed by BBNB, which has a market share of 28.98 percent. Banner Bank, like BBNB, is headquartered in Walla Walla. However, this institution has much broader operations with 168 offices and total assets of \$7.5 billion.

We completed a community contact interview with a representative of a local community action organization. The contact feels that the local economy is currently doing well financially. While the unemployment rate is fairly low, growth in wages has fallen behind growth in both property values, and rental expense increases. This individual noted that affordable housing was the primary community development need. There is a significant disparity in the quantity of affordable housing, relative to the number of lower income residents. The contact also noted that there are a significant number of migratory farm workers who also need additional low-income housing putting further strain on the supply of low-income housing. The contact feels that while overall, local financial institutions are actively serving the community, there are growing opportunities related to assisting with affordable housing. The contact noted a high level of community involvement from local trust funds and local financial institutions, which have been key to allowing for some recent development projects to begin.

The following table provides key demographic information for the Walla Walla AA.

The following table provides key demographic information for the Walla Walla AEA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Walla Walla 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	58.3	16.7	8.3
Population by Geography	58,781	0.0	14.8	58.5	22.8	3.9
Housing Units by Geography	23,157	0.0	16.1	61.7	22.2	0.1
Owner-Occupied Units by Geography	13,197	0.0	12.1	57.9	30.0	0.0
Occupied Rental Units by Geography	8,170	0.0	21.5	67.9	10.5	0.1
Vacant Units by Geography	1,790	0.0	20.8	61.3	17.8	0.0
Businesses by Geography	3,437	0.0	23.2	53.7	23.0	0.1
Farms by Geography	412	0.0	8.3	42.0	49.8	0.0
Family Distribution by Income Level	14,007	21.5	17.8	18.6	42.1	0.0
Household Distribution by Income Level	21,367	23.9	16.0	18.6	41.5	0.0
Median Family Income MSA - 47460 Walla Walla, WA MSA		\$55,944	Median Housing Value			\$195,219
			Median Gross Rent			\$654
			Families Below Poverty Level			12.4%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Walla Walla 2017/2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	8.3	8.3	66.7	8.3	8.3
Population by Geography	59,726	4.9	9.1	66.6	14.6	4.8
Housing Units by Geography	23,768	4.4	11.0	69.7	14.9	0.0
Owner-Occupied Units by Geography	13,944	3.7	9.0	66.2	21.0	0.0
Occupied Rental Units by Geography	7,752	5.6	14.2	75.1	5.2	0.0
Vacant Units by Geography	2,072	4.5	12.6	72.9	10.0	0.0
Businesses by Geography	3,560	5.8	16.3	63.4	14.4	0.1
Farms by Geography	408	2.7	5.1	76.7	15.4	0.0
Family Distribution by Income Level	13,688	22.1	15.1	22.2	40.6	0.0
Household Distribution by Income Level	21,696	24.1	15.0	17.7	43.2	0.0
Median Family Income MSA - 47460 Walla Walla, WA MSA		\$61,619	Median Housing Value			\$192,318
			Median Gross Rent			\$733
			Families Below Poverty Level			12.3%
Source: 2015 ACS Census and 2018 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.						

Benton-Franklin AA

The Benton-Franklin AA includes the cities of Kennewick, Pasco, and Richland.

Information from Moody's Analytics and the Washington State Economic Security Department shows that economic performance in the Kennewick-Richland area has been strong. High in-migration has been a key factor; however, Moody's Analytics notes that this growth could slow due to declines in federal funding of the Hanford Nuclear Site. There have also been declines in agricultural production due to trade worries within the past two years. Growth is expected to continue on the strength of the in-migration and manufacturing. The population in Benton County grew 13.3 percent to 198,171 from 2010 to 2017. The Franklin County population grew 17.9 percent to 94,347 over this same period. The top industries in Franklin County are healthcare, government, and manufacturing. The top industries in Benton County are government, health services, and professional/technical services. The top employers in the area are Hanford Site, Battelle/PNNL, Kadlec Regional Medical Center, Bechtel National, Inc., ConAgra/Lamb Weston, and Washington River Protection Solutions. The unemployment rate has dropped from 6.9 percent in 2015 to 5.4 percent in 2018. Total employment grew at rates of 2.2 percent in 2017 and 2.9 percent in 2018. The average annual wage in Benton and Franklin Counties was \$63,600 and \$64,300 in 2017 and 2018, respectively. These wages were up 3.7 percent and 4.2 percent from 2016 and 2017, respectively.

The FDIC Deposit Market Share Report as of June 30, 2018 shows that 17 commercial banks operate in the Benton-Franklin AA. BBNB ranks 13 out of 17, with 1.52 percent of the market share. The top four banks by market share are U.S. Bank, Yakima Federal Savings and Loan Association, Bank of America, and Banner Bank.

We completed a community contact interview with a representative of a local community action organization. The contact feels that the local economy is currently doing well financially. While the unemployment rate continues to decline, growth in wages has fallen behind growth in both property values, and rental expense increases. This individual noted that affordable housing was the primary community development need. There is a significant disparity in the quantity of affordable housing, relative to the number of lower income residents. The contact notes that there have been significant benefits to working with banks on community development as they have utilized bank employees to assist with grant proposals to fund community development activities. The contact feels that while overall, local financial institutions are actively serving the community, there are growing opportunities related to assisting with affordable housing. The contact noted a high level of community involvement from local trust funds and local financial institutions, which have been key to allowing for some recent development projects to begin.

Table A – Demographic Information of the Assessment Area**Assessment Area: Benton-Franklin 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	6.0	26.0	32.0	32.0	4.0
Population by Geography	253,340	9.5	25.1	34.9	30.5	0.0
Housing Units by Geography	90,305	8.6	23.7	36.1	31.5	0.0
Owner-Occupied Units by Geography	57,531	4.3	20.1	36.2	39.3	0.0
Occupied Rental Units by Geography	25,929	17.2	29.9	36.1	16.8	0.0
Vacant Units by Geography	6,845	12.1	30.3	35.5	22.2	0.0
Businesses by Geography	13,002	6.5	25.9	32.5	34.5	0.6
Farms by Geography	975	2.4	27.0	54.3	16.0	0.4
Family Distribution by Income Level	60,076	21.9	17.5	20.0	40.7	0.0
Household Distribution by Income Level	83,460	23.1	16.8	18.3	41.8	0.0
Median Family Income MSA - 28420 Kennewick-Richland, WA MSA		\$63,929	Median Housing Value			\$161,247
			Median Gross Rent			\$729
			Families Below Poverty Level			11.2%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area**Assessment Area: Benton-Franklin 2017/2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	2.0	30.0	32.0	32.0	4.0
Population by Geography	271,373	3.1	32.2	34.8	29.9	0.0
Housing Units by Geography	97,502	3.0	29.9	35.0	32.0	0.0
Owner-Occupied Units by Geography	62,103	1.2	25.1	35.0	38.7	0.0
Occupied Rental Units by Geography	30,052	7.0	39.6	34.5	18.9	0.0
Vacant Units by Geography	5,347	0.7	32.3	39.0	28.0	0.0
Businesses by Geography	13,782	1.3	29.3	37.6	31.4	0.5
Farms by Geography	1,029	0.9	25.9	54.7	18.2	0.3
Family Distribution by Income Level	65,837	21.6	17.6	19.5	41.3	0.0
Household Distribution by Income Level	92,155	23.9	16.1	19.0	41.0	0.0
Median Family Income MSA - 28420 Kennewick-Richland, WA MSA		\$66,500	Median Housing Value			\$179,030
			Median Gross Rent			\$843
			Families Below Poverty Level			12.0%

Source: 2015 ACS Census and 2018 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.

Yakima

Yakima AA is located in the central part of Washington state. The AA includes all parts of Yakima county, and the city of Yakima. The county is bordered on the east by Benton-Franklin, to the south by Klickitat, to the north by Kittitas, and to the west by Lewis county.

Our review of Moody's Analytics and the Washington State Economic Security Department show that Yakima has had sustained but slowing growth. Moody's Analytics notes that the county is heavily dependent on agriculture, and the industry has seen a slowdown as a result of tariffs, and inclement weather respectively. Since 2010, the county has had an increase of 2.9 percent, from 244 thousand to 251 thousand. This modest growth is anticipated to continue, with a potential improvement should trade or the agricultural production improve over the next year. The major industries within Yakima are agriculture at 26.6 percent of the workforce, healthcare at 14.0 percent, and local government at 12.2 percent. The AA has a higher unemployment rate relative to the rest of the state at 6.8 percent; however, this has declined every year since 2011. The AA's average wage is \$38,374 for 2017, which is significantly under the state's average salary of \$62,073 for the same period. The AA also has a high level of poverty, with 18.1 percent of the population living in poverty within Yakima county.

The FDIC Deposit Market Share Report as of June 30, 2018 shows that 15 commercial banks are located within Yakima. The three institutions with the largest deposit share hold 54.5 percent of the total deposits in the area. These institutions are Yakima Federal Savings and Loan, US Bank, and Banner Bank. BBNB holds less than 1 percent of the total deposits for this area.

We completed a community contact interview with a representative of a local community action organization. The representative noted that the local economy is improving, with growth in tourism because of the growth in the winery industry in the area. The contact noted that low-income housing is the primary issue for the area. The area has a significant quantity of low-income individuals, and providing housing is a significant challenge. They discussed utilizing networks of local community organizations, with support from financial institutions, pooling resources in order to help facilitate the construction of additional low-income housing in the city. The contact also noted that crime is a significant issue for the area and hampers local development. The contact noted that they believe there are opportunities for financial institutions to further assist with local low-income housing plans and highlighted a recent veterans housing center which had been constructed as a result of partnerships with local groups.

Washington – 2016 – Yakima MSA – Table A - Demographic Information of the Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Yakima 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	4.4	33.3	35.6	26.7	0.0
Population by Geography	243,231	4.1	34.2	34.4	27.3	0.0
Housing Units by Geography	84,387	3.8	30.0	36.0	30.2	0.0
Owner-Occupied Units by Geography	50,710	1.3	25.2	35.1	38.5	0.0
Occupied Rental Units by Geography	28,365	8.5	38.4	36.1	17.0	0.0
Vacant Units by Geography	5,312	2.3	31.8	45.2	20.7	0.0
Businesses by Geography	11,008	8.3	29.0	33.1	29.6	0.0
Farms by Geography	1,200	2.3	16.7	57.8	23.3	0.0
Family Distribution by Income Level	58,284	22.4	16.9	19.9	40.9	0.0
Household Distribution by Income Level	79,075	23.3	15.7	19.5	41.5	0.0
Median Family Income MSA - 49420 Yakima, WA MSA		\$48,004	Median Housing Value			\$145,427
			Median Gross Rent			\$654
			Families Below Poverty Level			16.8%
Source: 2010 U.S. Census and 2016 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.						

Washington – 2017/2018 Yakima AA – Table A - Demographic Information of the Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Yakima 2017/2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.0	28.9	42.2	28.9	0.0
Population by Geography	247,408	0.0	28.5	42.6	28.9	0.0
Housing Units by Geography	86,208	0.0	23.9	42.3	33.8	0.0
Owner-Occupied Units by Geography	49,969	0.0	17.6	41.2	41.3	0.0
Occupied Rental Units by Geography	30,003	0.0	35.1	45.0	19.9	0.0
Vacant Units by Geography	6,236	0.0	20.0	38.7	41.3	0.0
Businesses by Geography	11,023	0.0	29.0	39.3	31.7	0.0
Farms by Geography	1,134	0.0	8.1	56.2	35.7	0.0
Family Distribution by Income Level	57,541	20.2	18.1	20.6	41.1	0.0
Household Distribution by Income Level	79,972	22.0	17.4	19.5	41.1	0.0
Median Family Income MSA - 49420 Yakima, WA MSA		\$49,907	Median Housing Value			\$154,614
			Median Gross Rent			\$787
			Families Below Poverty Level			16.5%
Source: 2015 ACS Census and 2018 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.						

Scope of Evaluation in Washington

We analyzed borrower distribution by borrower income and geographic distribution in all three of BBNB's assessment areas in Washington. Our assessments incorporated economic conditions, local competition, the bank's strategic emphasis in Washington state, and the need for essential community development services such as affordable housing, economic development that creates middle-income or low-income jobs, and financial education. However, consistent with BBNB's historic and current strategic focus on trust services in the Yakima and Benton-Franklin AAs, lending volumes were insufficient for analysis for the following time periods and loan product combinations to meet OCC sampling guidelines.

- Yakima AA home mortgage lending for 2016 and for 2017/2018,
- Yakima AA small business lending for 2016 and for 2017/2018,
- Benton-Franklin AA home mortgage lending for 2016,
- Benton-Franklin AA small business lending for 2016.

Our analysis of 2016 bank lending data is compared to 2010 census data while 2017/2018 data is compared to updated 2015 census information. For this reason, these time periods are presented separately in the following tables that present lending test data. Based on the time periods and loan products with insufficient lending activity for further analysis, our conclusions are focused on home mortgage lending and small business lending in the Walla Walla AA for the entire assessment period as well as home mortgage lending and small business lending in the Benton-Franklin AA for the 2017/2018 period. Due to the lack of sufficient loans to conduct a full analysis, we will weight Yakima's performance less than the other branch locations, but will conduct a review of home mortgage lending, and small business lending within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

In Washington, BBNB's performance under the Lending Test is "Satisfactory."

The Walla Walla AA was given the most weight in the analysis for Washington, as the majority of the bank's deposits and loans come from this AA.

Based on full-scope review of the bank's lending performance in the state of Washington is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in Washington. Business lending during 2017/2018 was given the most weight as this was the largest segment of loans originated by the institution, and we had enough loan data to give a greater analysis of the loans originated. Home mortgage lending was focused on the Walla Walla AA.

The tables in this section reflect BBNB's performance against demographic data. For each census tract designation based on income, the tables state the percentage of businesses or households in the designated tract categories. Demographic data is compared to the bank's commercial loans or residential mortgage loans made in designated tract categories, which is derived from either the business loan sample or from HMDA data for the loan review period. Refer to Table O below for further details.

Home Mortgage Loans

Refer to Table O in the state of Washington 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.

BBNB's mortgage lending in the Walla Walla assessment area performed better than peer in moderate income tracts, and near to peer data in low income tracts. In 2016, the bank originated no loans to low-income tracts; however, there are no houses located within low-income tracts within the AA. The bank originated 8.6 percent of their home mortgage loans, which is slightly under peer bank data which is 11.1 percent of home mortgage loans. The census data for 2016 indicates that only 12.1 percent of homes in the AA are located within moderate-income tracts.

In the 2017 through 2018 period, the bank originated 2.5 percent of loans in low-income tracts within the Walla Walla AA. This is in-line with peer performance at 3.0 percent and is in-line with the 3.7 percent of homes located within low-income tracts. The bank originated 11.1 percent of their loans within moderate-income tracts, which compares favorably to peer bank data which indicates that peer institutions originated 8.7 percent. It also compares favorably to the overall distribution of households, as only 9.0 percent of households are located in moderate-income tracts. Overall, the bank's performance in Walla Walla was more than satisfactory due to the bank's strong performance in 2017/2018.

The geographic distribution of mortgage lending in Benton-Franklin had slightly below peer performance in moderate income areas, and in-line with peer data for low income areas. In 2016, BBNB only originated 12 loans within the Benton-Franklin AA. This is insufficient to evaluate home mortgage lending in the 2016 period. In 2017/2018, BBNB originated no loans in low-income census tracts. This is comparable to peer bank data, as HMDA data indicates only 1.1 percent of loans were originated in low-income census tracts, and 1.3 percent of total residences were located in low-income census tracts. BBNB originated 10.0 percent of loans in moderate-income tracts. This is below peer data, which indicated that 21.0 percent of loans were originated in moderate-income census tracts. It is also below aggregate data for the AA, as 25.1 percent of residences are located in moderate-income tracts.

BBNB originated 9 home mortgage loans in the Yakima AA between 2016 and 2018. This is an insufficient number of loans to evaluate for either the 2016, or 2017 and 2018 time period. As such, we will minimize the weight of BBNB's lending in Yakima for our geographic evaluation of home mortgage originations.

Small Loans to Businesses

Refer to Table Q in the state of Washington 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.

BBNB's business lending in the Walla Walla assessment area performed similarly to peer in low-income census tracts, and significantly below peer for moderate income tracts. In 2016, the bank originated no business loans to low-income tracts; however, there are no businesses based within low-income tracts within the AA. The bank originated 4.8 percent of their business loans in moderate-income tracts, which is significantly under peer bank data which is 18.2 percent of business loans. The census data for 2016 indicates that only 23.2 percent of businesses in the AA are located within moderate-income tracts.

In 2017 and 2018, the bank originated 0.0 percent of business loans in low-income tracts within the Walla Walla AA. This is slightly below peer performance at 5.7 percent and is in-line with the 5.8 percent of businesses located within low-income tracts. The bank originated 4.8 percent of their loans within moderate-income tracts, which compares poorly to peer bank data which indicates that peer institutions originated 17.4 percent. It also compares poorly to the overall distribution of businesses, as only 16.3 percent of businesses are located in moderate-income tracts.

The geographic distribution of commercial lending in Benton-Franklin had significantly above peer performance in moderate income areas, and in-line with peer data for low income areas. In 2016, BBNB only originated 7 commercial loans within the Benton-Franklin AA. This is insufficient to evaluate the geographic component of commercial lending in the 2016 period. In 2017/2018, BBNB originated no commercial loans in low-income census tracts. This is comparable to peer bank data, as HMDA data indicates only 1.2 percent of business loans were originated in low-income census tracts, and 1.3 percent of AA businesses were located in low-income census tracts. BBNB originated 50.0 percent of commercial loans in moderate-income tracts. This is significantly above peer data, which indicated that 29.0 percent of loans were originated in moderate-income census tracts. It is also below aggregate data for the AA, as 29.3 percent of Walla Walla businesses are located in moderate-income tracts.

BBNB originated 7 business loans in the Yakima AA in 2016, and originated 13 business loans in 2017 and 2018. This is an insufficient number of loans to evaluate for either time period. As such, we will minimize the weight of BBNB's lending in Yakima for our geographic evaluation of commercial originations.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. The tables in this section reflect BBNB's performance against demographic data. For small business lending, the tables lead with the demographic comparator ratios, followed by BBNB's lending performance by both number and dollar volume. We derived bank data from representative commercial loan samples, with each category shown as a percentage of total reviewed loans. For residential mortgages, the tables compare the bank's reported HMDA data to income demographics in the AA.

BBNB's lending to businesses of different sizes in both the Walla Walla AA and the Benton-Franklin AA is consistent with the aggregate lending of the AA. Yakima had insufficient loans made in the AA to perform a meaningful analysis. Refer to Table R for further details.

Home Mortgage Loans

Refer to Table P in the state of Washington 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.

The distribution of home mortgage loans to low- and moderate-income (LMI) families in the Walla Walla AA is reasonable. The lack of affordable housing reduces opportunities for mortgage lending to LMI borrowers in the AA. This is demonstrated by the considerable lag between demographic data and aggregate lending in the AA. BBNB originated 2.5 percent of mortgage loans to low-income families in 2016. Aggregate HMDA data indicates that 3.1 percent of home mortgage loans within the AA were originated to low-income families in 2016. Census data indicates 21.5 percent of AA families are low-income. The bank originated 11.1 percent of home mortgage loans to moderate-income families in 2016. Aggregate HMDA data indicates that 11.6 percent of home mortgage loans within the AA were originated to moderate-income families in 2016. Census data indicates 18.6 percent of AA families are moderate-income.

In 2017-2018, BBNB originated 5.6 percent of mortgage loans to low-income families within the AA. Aggregate HMDA data indicates that 5.1 percent of home mortgage loans within the AA were originated to low-income families in 2017-2018. Census data indicates 22.1 percent of AA families are low-income. The bank originated 7.1 percent of home mortgage loans to moderate-income families in 2017-2018. Aggregate HMDA data indicates that 12.1 percent of home mortgage loans within the AA were originated to moderate-income families. Census data indicates 15.1 percent of AA families are moderate-income.

The distribution of home mortgage loans in the Benton-Franklin AA is reasonable in relation to aggregate lending data for low income borrowers. BBNB's lending to moderate income borrowers compares poorly to both the aggregate data as well as the percentage of moderate-income families in the AA, however, greater weight is given to the Walla Walla AA lending performance because of BBNB's minimal amount of banking activity in the Benton-Franklin AA both in deposit taking as well as home loan lending. The lack of affordable housing reduces opportunities for mortgage lending to low income borrowers in the AA. This is demonstrated by the considerable lag between demographic data and aggregate lending in the AA. BBNB did not originate any mortgage loans to low-income families in 2017/2018. Aggregate HMDA data indicates that only 4.4 percent of home mortgage loans within the AA were originated to low-income families in 2016. Census data indicates 21.6 percent of AA families are low-income. The bank originated 10.0 percent of home mortgage loans to moderate-income families in 2017/2018. Aggregate HMDA data indicates that 16.6 percent of home mortgage loans within the AA were originated to moderate-income families in 2017/2018. Census data indicates 17.7 percent of AA families are moderate-income.

BBNB originated 2 home mortgage loans in 2016, and 7 home mortgage loans 2017 and 2018. This is insufficient to conduct a meaningful analysis for the AA.

Small Loans to Businesses

Refer to Table R in the state of Washington 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 distribution of business loans to businesses with gross annual revenues of \$1 million or less in the Walla Walla AA reflects reasonable penetration among small businesses of different sizes. In 2016, BBNB originated 76.2 percent of sampled business loans to small businesses with gross annual revenues of \$1 million or less in Walla Walla. This performance significantly exceeds the peer data which

indicates 41.2 percent of loans within the AA were to small businesses. Census data indicates that 84.1 percent of businesses have gross annual revenues of \$1 million or less.

In 2017-2018, BBNB originated 85.7 percent of its business loans to small businesses with gross annual revenues of \$1 million or less in Walla Walla. This ratio of lending to small businesses continues to exceed the aggregate CRA data which indicates that 52.0 percent of loans within the AA were to small business. Census data indicates that 83.8 percent of businesses have gross annual revenues of \$1 million or less.

The distribution of business loans to businesses with gross annual revenues of \$1 million or less in the Benton-Franklin AA reflects reasonable penetration among small businesses of different sizes. In 2016, BBNB originated 71.4 percent of sampled business loans to small businesses with gross annual revenues of \$1 million or less. This performance significantly exceeds the aggregate CRA data which indicates 38.4 percent of loans within the AA were to small businesses. Census data indicates that 82.7 percent of businesses in Benton-Franklin have gross annual revenues of \$1 million or less.

In 2017-2018, BBNB originated 75.0 percent of its business loans to small businesses in Benton-Franklin with gross annual revenues of \$1 million or less. This ratio of lending to small businesses continues to significantly exceed the aggregate CRA data which indicates that 50.6 percent of loans within the AA were to small business. Census data indicates that 82.7 percent of businesses have gross annual revenues of \$1 million or less.

In Yakima, BBNB originated 7 commercial loans in 2016, and 13 commercial loans in the 2017 and 2018 period. This is an insufficient quantity of loans to perform a meaningful analysis.

Responses to Complaints

There were no complaints with relation to the bank's CRA performance within the state of Washington.

COMMUNITY DEVELOPMENT TEST

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

Based on full-scope reviews, the bank exhibits adequate 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

Refer to the Lending Activity tables below for the facts and data used to evaluate the bank's level of CD lending.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Walla Walla AA	8	80%	\$3,379	78%
Benton-Franklin AA	1	10%	\$842	19%
Yakima AA	1	10%	\$100	2%

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

The bank exhibited excellent responsiveness to community development needs in the Walla Walla AA through community development loans relative to the community development lending opportunities in the AA. During the evaluation period, the bank originated eight community development loans totaling \$3.38 million that benefited the Walla Walla AA. These loans provided necessary community services funding for such projects as construction of a homeless women and children shelter, LMI housing and counseling, and refinancing of a local property that houses the county's social services programs.

The bank exhibited adequate responsiveness to community development needs in the Benton - Franklin AA. The bank originated one community development loan for \$842 thousand in this AA during the evaluation period. The loan was a qualified SBA 504 loan to a local dental practitioner.

The bank exhibited adequate responsiveness to community development needs in the Yakima AA. During the evaluation period, the bank originated one community development loan totaling \$100 thousand that benefited the Yakima AA. The loan helped stabilize a local 24-hour pharmacy which provides service to the community as well as free vaccinations to the un/underinsured.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Walla Walla AA	0	\$0	25	\$2,151	25	45%	\$2,151	22%	0	\$0
Benton – Franklin AA	4	\$1,140	9	\$2,251	13	24%	\$3,391	35%	0	\$0
Yakima	6	\$1,960	11	\$2,366	17	31%	\$4,285	43%	0	\$0

* 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 that are tracked and recorded by the institution's financial reporting system.

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified community development investments. This table includes all community development investments, including prior period investments that remain outstanding as of the examination date.

The bank exhibited poor responsiveness to community development needs in the Walla Walla AA through qualified investments given the overall level of investments relative to investment opportunities within the AA. During the evaluation period, the bank donated \$206 thousand to over 15 qualified organizations operating in the Walla Walla AA. These donations funded necessary community services, such as food banks, youth center as well as a women and children shelter. The donations had a focused attention on the LMI community. The bank also made investments into the Walla Walla AA via the purchasing of \$1.9 million in general obligation municipal bonds. These bonds provide infrastructure support to schools where over fifty percent of students received free or reduced fare lunches.

The bank exhibited poor responsiveness to community development needs through investments in the Benton-Franklin AA given the overall level of investments relative to investment opportunities within the AA. During the evaluation period, the bank donated \$6 thousand to four qualified organizations operating in the Benton-Franklin AA. These donations funded LMI community services, such as medical screening for uninsured and support for abused children. The bank also made investments into the Benton-Franklin AA by purchasing of \$3.4 million in general obligation municipal bonds. These bonds provide infrastructure support to schools that support a majority of LMI students as well as supporting the local hospital where there has been a shortage in medical services.

The bank exhibited poor responsiveness to community development needs in the Yakima AA through qualified investments given the overall level of investments relative to investment opportunities within the AA. During the evaluation period, the bank donated \$41 thousand to six qualified organizations operating in the Yakima AA. These donations funded community programs that provide scholarships as well as to the United Way with a focus on programs supporting LMI individuals. The bank also made investments into the Umatilla AA via the purchasing of \$4.3 million in general obligation municipal bonds. These bonds provide infrastructure support to schools where over fifty percent of students received free or reduced fare lunches.

Extent to Which the Bank Provides Community Development Services

The bank exhibited excellent responsiveness to community development needs in the Walla Walla AA through community development services given the level of services which exist within the AA. During the evaluation period, bank employees dedicated 2145 service hours to over 30 qualified organizations operating in the Walla Walla AA. These organizations provide and/or facilitate food banks, safe affordable housing, financial education, low-cost legal advice for LMI individuals, and industrial economic development. The bank's community development services are responsive to the AA needs identified by our community contact, including affordable housing and job creation.

The bank exhibited excellent responsiveness to community development needs in the Benton-Franklin AA through community development services given the level of services which exist within the AA. During the evaluation period, bank employees dedicated 330 service hours to 6 qualified organizations operating in the Benton-Franklin AA. These organizations help facilitate housing for LMI individuals as well as complementary medical services for those in need.

The bank exhibited excellent responsiveness to community development needs in the Yakima AA through community development services given the level of services which exist within the AA. During the evaluation period, bank employees dedicated 168 service hours to 3 qualified organizations operating in the Yakima AA. These organizations help with domestic violence victims, provide scholarships to underprivileged students, and support economic development in the AA.

State of Oregon

CRA rating for the State of Oregon: 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 evaluation period lending activity in the Umatilla AA indicates a more than reasonable penetration through a variety of businesses of different sizes, and among individuals of multiple income levels.
- The bank has demonstrated a more than adequate overall responsiveness to the community development (CD) needs of its AA in Oregon.

Description of Institution's Operations in Oregon

The bank maintains one branch in the city of Milton-Freewater, OR. Management designated the county of Umatilla as its sole AA in the state of Oregon.

Umatilla AA

The Umatilla AA comprises the entire county of Umatilla in Oregon. The county is located in the Northeastern region of Oregon at the Washington border, at the confluence of the Umatilla and Columbia Rivers. Umatilla County comprises the majority of the Pendleton-Hermiston, OR Micropolitan Statistical Area. Umatilla County is 3,231 square miles in size. It borders Walla Walla County, WA and Benton County, WA to the north, both of which are part of the bank's AAs. Columbia County, WA is to the Northeast of Umatilla County. Umatilla County is also bordered by the Oregon counties of Wallowa, Union, Grant, and Morrow. The US Census Bureau estimates the County population at 76,738 as of July 1, 2018. The estimated growth rate from April 1, 2010 to July 1, 2018, was approximately 0.9 percent, much lower than the overall Oregon growth rate of 9.5 percent. The largest city in Umatilla County is Hermiston, which had a 2018 population of 17,671 per estimates from the US Census bureau. Pendleton, the county seat, is the second largest city with a population of 16,781. Milton-Freewater, the city in which BBNB's branch resides, had a population of 7,053. The median household income from 2011-2015 was \$48,101. Umatilla County's top industries are retail industries, manufacturing, and healthcare.

Ten commercial banks operate in the AA per the FDIC Deposit Market Share Report dated June 30, 2018. The largest two deposit holders are Banner Bank and U.S. Bank which hold 36.9 percent and 18.9 percent of total deposits in the area, respectively. BBNB ranks six out of ten, with a market share of 5.3 percent.

We tried to contact multiple community contacts within Milton-Freewater; however, none of the contacts we tried to contact would agree to an interview or respond to our requests. We considered looking for a community contact located in Pendleton, or other parts of the county; however, this would not be indicative of performance for the institution, as the entirety of their operations are located in the town of Milton-Freewater, which is a town just across the border from Walla Walla.

Table A – Demographic Information of the Assessment Area**Assessment Area: Umatilla 2016**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	0.0	93.3	6.7	0.0
Population by Geography	75,889	0.0	0.0	91.8	8.2	0.0
Housing Units by Geography	29,586	0.0	0.0	93.7	6.3	0.0
Owner-Occupied Units by Geography	16,991	0.0	0.0	93.2	6.8	0.0
Occupied Rental Units by Geography	9,554	0.0	0.0	94.6	5.4	0.0
Vacant Units by Geography	3,041	0.0	0.0	94.4	5.6	0.0
Businesses by Geography	4,067	0.0	0.0	93.7	6.3	0.0
Farms by Geography	497	0.0	0.0	84.7	15.3	0.0
Family Distribution by Income Level	18,716	18.0	16.7	22.2	43.0	0.0
Household Distribution by Income Level	26,545	20.2	14.7	18.5	46.7	0.0
Median Family Income Non-MSAs - OR		\$50,374	Median Housing Value			\$138,698
			Median Gross Rent			\$615
			Families Below Poverty Level			11.0%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area**Assessment Area: Umatilla 2017/2018**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	0.0	73.3	26.7	0.0
Population by Geography	76,738	0.0	0.0	71.5	28.5	0.0
Housing Units by Geography	29,741	0.0	0.0	75.6	24.4	0.0
Owner-Occupied Units by Geography	16,791	0.0	0.0	73.4	26.6	0.0
Occupied Rental Units by Geography	10,003	0.0	0.0	78.5	21.5	0.0
Vacant Units by Geography	2,947	0.0	0.0	78.1	21.9	0.0
Businesses by Geography	4,081	0.0	0.0	78.9	21.1	0.0
Farms by Geography	479	0.0	0.0	58.5	41.5	0.0
Family Distribution by Income Level	18,288	19.1	15.5	19.6	45.8	0.0
Household Distribution by Income Level	26,794	20.9	14.6	16.8	47.6	0.0
Median Family Income Non-MSAs - OR		\$51,555	Median Housing Value			\$144,672
			Median Gross Rent			\$694
			Families Below Poverty Level			13.9%

Source: 2015 ACS Census and 2018 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.

Scope of Evaluation in Oregon

We conducted a full-scope review of BBNB's performance in its sole AA in Oregon, the Umatilla County AA. Since this AA has no low or moderate-income census tracts, the geographic distribution of lending within the AA is not meaningful. The results of the lending test will be based on the bank's performance in lending to borrowers of different incomes and to businesses of different sizes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Oregon is reasonable.

This conclusion is based on performance in the Umatilla AA, the bank's sole AA in the state. The bank has a poor level of home mortgage lending to low and moderate-income individuals relative to both census data, and aggregate HMDA data; however, this is offset due to the excellent distribution of loans to businesses of different sizes relative to the same census or peer business data. Due to the lack of low- and moderate-income census tracts, the geographic distribution of lending for home mortgages or small businesses does not factor into the overall performance rating for this area.

Distribution of Loans by Income Level of the Geography

Geographic analysis was not meaningful for Oregon due to an absence of low- or moderate- income tracts located within the AA. The bank exhibits reasonable geographic distribution of loans in the state of Oregon. There were no low- or moderate-income tracts in the Umatilla AA during the evaluation period. Due to the absence of low- or moderate- income tracts to assess, the geographic analysis was not performed. The tables for geographic distribution in Oregon below are included for reference.

The tables in this section reflect BBNB's performance against demographic data. For each census tract designation based on income, the tables state the percentage of businesses or households in the designated tract categories. Demographic data is compared to BBNB's commercial loans or residential mortgage loans originated in designated tract categories, which is derived from either the business loan sample or from HMDA data for the loan review period.

Home Mortgage Loans

Refer to Table O in the state of Oregon 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.

None of Umatilla was located within a low or moderate-income CT for either 2016, or 2017-2018. An analysis of the area was not performed.

Small Loans to Businesses

Refer to Table Q in the state of Oregon 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.

None of Umatilla was located within a low or moderate-income CT for either 2016, or 2017-2018. An analysis of the area was not performed.

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. We gave greater weight to commercial lending performance, given that commercial lending is BBNB's primary focus. BBNB's record of lending to borrowers of different income levels and businesses of different sizes meets the standard for satisfactory performance.

The tables in this section reflect BBNB's performance against demographic data. For commercial loans, the tables lead with the demographic comparator ratios, followed by BBNB lending performance by both number and dollar volume. We derived bank data from representative commercial loan samples, with each category shown as a percentage of total reviewed loans. For residential mortgages, the tables compare the bank's reported HMDA data to income demographics in the AA.

The distribution of commercial loans reflects excellent penetration to small businesses with revenues under \$1 million. In 2017/2018 BBNB originated 77.8 percent of loans to businesses with revenues under \$1 million compared to 53.5 percent of peer aggregate lending and 81 percent of businesses in the AA reporting annual revenues under \$1 million.

BBNB's home loan lending to low income borrowers is reasonable in relation to the lack of affordable housing for low income borrowers and aggregate home loan lending performance. In 2017/2018 BBNB made no loans to low income borrowers and aggregate lending performance also reflects very low levels of lending at 3.1 percent compared to 19.1 percent of families reporting as low income in the AA. For moderate income borrowers, BBNB reports 5.6 percent of loans were to moderate income borrowers compared to aggregate lending of 14.1 percent and 15.5 percent of families reporting as moderate income.

Home Mortgage Loans

Refer to Table P in the state of Oregon 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.

The overall borrower distribution for the bank's home mortgage loan originations is reasonable. In 2016, BBNB originated no mortgage loans to low-income families in the Umatilla AA. Aggregate HMDA data indicates that 2.9 percent of home mortgage loans within the AA were originated to low-income families in 2016. Census data indicates 18.0 percent of AA families are low-income. The bank originated no home mortgage loans to moderate-income families in 2016. Aggregate HMDA data indicates that 13.4 percent of home mortgage loans within the AA were originated to moderate-income families. Census data indicates 16.7 percent of AA families are moderate-income.

In 2017-2018, BBNB originated no mortgage loans to low-income families within the Umatilla AA. Aggregate HMDA data indicates that 3.1 percent of home mortgage loans within the AA were originated to low-income families in 2017-2018. Census data indicates 19.1 percent of AA families are low-income. The bank originated 5.6 percent of home mortgage loans to moderate-income families in 2017-2018. Aggregate HMDA data indicates that 14.1 percent of home mortgage loans within the AA were originated to moderate-income families. Census data indicates 15.5 percent of AA families are moderate-income. The lower level of lending to low-income families is due to the lack of affordable housing located within the AA. For moderate-income families, the level of lending is under peer banks performance; however, there is a notable increase in the level of lending from 2016 to 2017-2018. The bank is currently taking steps to expand their lending presence within Umatilla and plans to add a local loan officer to encourage loan generation within the area.

Small Loans to Businesses

Refer to Table R in the state of Oregon 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 distribution of business loans to businesses with gross annual revenues of \$1 million or less in the Umatilla AA reflects excellent penetration among small businesses of different sizes. In 2016, BBNB originated 100 percent of sampled business loans to small businesses with gross annual revenues of \$1 million or less. This performance significantly exceeds the aggregate CRA data which indicates 45.2 percent of loans within the AA were to small businesses. Census data indicates that 81.1 percent of businesses have gross annual revenues of \$1 million or less.

In 2017-2018, BBNB originated 77.8 percent of its business loans to small businesses with gross annual revenues of \$1 million or less. This ratio of lending to small businesses continues to exceed the aggregate CRA data which indicates that 53.5 percent of loans within the AA were to small business. Census data indicates that 81.0 percent of businesses have gross annual revenues of \$1 million or less.

Responses to Complaints

There were no complaints with relation to the bank's CRA performance within the state of Oregon.

COMMUNITY DEVELOPMENT TEST

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

Based on a full-scope review, the bank exhibits adequate 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 area.

Number and Amount of Community Development Loans

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Umatilla AA	2	100%	\$510	100%

The Community Development Loans Table, shown above, set forth the information and data used to evaluate the bank's level of community development lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank exhibited adequate responsiveness to community development needs in the Umatilla AA through community development lending specifically to the city of Milton-Freewater relative to the level of opportunities available within the AA. During the evaluation period, the bank originated two community development loan totaling \$510 thousand that benefited the Umatilla AA. The largest of these loans to the city of Milton-Freewater provided funds to the city to continue critical operations of the city's power and water treatment facilities.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Umatilla AA	2	\$575	2	\$2	4	100%	\$577	100%	0	\$0

* 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 that are tracked and recorded by the institution's financial reporting system.

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified community development investments. This table includes all community development investments, including prior period investments that remain outstanding as of the examination date.

The bank exhibited adequate responsiveness to community development needs in the Umatilla AA through qualified investments relative to opportunities available within the AA. During the evaluation period, the bank donated \$2 thousand to two qualified organizations operating in the Umatilla AA. These organizations provided LMI individuals housing opportunities as well as providing food. The bank also made investments into the Umatilla AA via the purchasing of general obligation municipal bonds. These bonds provide infrastructure support to schools where over fifty percent of students received free or reduced fare lunches.

Extent to Which the Bank Provides Community Development Services

The bank exhibited excellent responsiveness to community development needs in the Umatilla AA through community development services. During the evaluation period, bank employees dedicated 37 service hours to two qualified organizations operating in the Umatilla AA. Given the small size of the branch located in this AA, and limited staffing at the branch, this is a significant quantity. These organizations include a housing rehabilitation program to assist LMI individuals maintain home ownership as well as the local school district.

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 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”.

Time Period Reviewed:	06/30/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage, and small business loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Oregon		
Umatilla	Full-Scope	
Washington		
Benton-Franklin	Full-Scope	
Walla Walla	Full-Scope	
Yakima	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS Baker Boyer National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Baker Boyer NB	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Oregon	Satisfactory	Satisfactory	Satisfactory
Washington	Satisfactory	Satisfactory	Satisfactory

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

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:

- 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.

Oregon - 2016 - Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Umatilla 2016	9	1,687	100.0	1,867	0.0	0.0	0.0	0.0	0.0	0.0	93.2	100.0	94.3	6.8	0.0	5.7	0.0	0.0	0.0
Total	14	1,687	100.0	1,867	0.0	0.0	0.0	0.0	0.0	0.0	93.2	100.0	94.3	6.8	0.0	5.7	0.0	0.0	0.0
Source: 2010 U.S Census; 07/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Oregon – 2017/2018 - Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
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
Umatilla 2017/2018	18	3,146	100.0	1,718	0.0	0.0	0.0	0.0	0.0	0.0	73.4	72.2	77.2	26.6	27.8	22.8	0.0	0.0	0.0
Total	18	3,146	100.0	1,718	0.0	0.0	0.0	0.0	0.0	0.0	73.4	72.2	77.2	26.6	27.8	22.8	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Washington – 2016 - Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Benton-Franklin 2016	12	2,355	12.6	10,557	4.3	0.0	2.8	20.1	25.0	15.1	36.2	16.7	37.0	39.3	58.3	45.1	0.0	0.0	0.0
Walla Walla 2016	81	17,448	85.3	1,943	0.0	0.0	0.0	12.1	8.6	11.1	57.9	46.9	59.2	30.0	44.4	29.6	0.0	0.0	0.1
Yakima 2016	2	317	2.1	5,686	1.3	0.0	1.3	25.2	0.0	16.4	35.1	0.0	32.4	38.5	100.0	49.9	0.0	0.0	0.0
Total	95	20,120	100.0	18,186	2.6	0.0	2.0	21.4	10.5	15.1	38.1	42.1	37.9	38.0	47.4	45.0	0.0	0.0	0.0
Source: 2010 U.S Census; 07/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Filter: 07172019BBNB2016 HMDA Submission: Action Date is between 7/1/2016 12:00:00 AM and 9/30/2016 12:00:00 AM or Action Date is between 10/1/2016 12:00:00 AM and 12/31/2016 12:00:00 AM.																			

Washington – 2017/2018 - Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
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
Benton-Franklin 2017-18	20	6,429	8.9	9,757	1.3	0.0	1.1	25.1	10.0	21.0	35.0	20.0	34.8	38.7	70.0	43.1	0.0	0.0	0.1
Walla Walla 2017-18	198	44,346	88.0	1,782	3.7	2.5	3.0	9.0	11.1	8.7	66.2	56.1	66.7	21.0	30.3	21.7	0.0	0.0	0.0
Yakima 2017-18	7	1,195	3.1	5,070	0.0	0.0	0.0	17.6	14.3	13.1	41.2	28.6	39.1	41.3	57.1	47.8	0.0	0.0	0.0
Total	225	51,970	100.0	16,609	1.0	2.2	1.0	20.3	11.1	17.2	40.9	52.0	39.5	37.8	34.7	42.2	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Oregon – 2016 – Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	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
Umatilla 2016	9	1,687	100.0	1,867	18.0	0.0	2.9	16.7	0.0	13.4	22.2	22.2	21.3	43.0	55.6	40.9	0.0	22.2	21.5
Total	9	1,687	100.0	1,867	18.0	0.0	2.9	16.7	0.0	13.4	22.2	22.2	21.3	43.0	55.6	40.9	0.0	22.2	21.5
Source: 2010 U.S. Census ; 07/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Filter: 07172019BBNB2016 HMDA Submission: Action Date is between 7/1/2016 12:00:00 AM and 9/30/2016 12:00:00 AM or Action Date is between 10/1/2016 12:00:00 AM and 12/31/2016 12:00:00 AM.																			

Oregon 2017/2018 – Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	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
Umatilla 2017-18	18	3,146	360.0	1,718	19.1	0.0	3.1	15.5	5.6	14.1	19.6	38.9	22.4	45.8	50.0	42.5	0.0	5.6	17.9
Total	18	3,146	360.0	1,718	19.1	0.0	3.1	15.5	5.6	14.1	19.6	38.9	22.4	45.8	50.0	42.5	0.0	5.6	17.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Washington – 2016 - Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	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
Benton-Franklin 2016	12	2,355	12.6	10,557	21.9	8.3	5.2	17.5	0.0	16.6	20.0	16.7	22.1	40.7	58.3	41.6	0.0	16.7	14.6
Walla Walla 2016	81	17,448	85.3	1,943	21.5	2.5	3.1	17.8	11.1	11.6	18.6	12.3	21.7	42.1	63.0	44.4	0.0	11.1	19.2
Yakima 2016	2	317	2.1	5,686	22.4	0.0	2.9	16.9	0.0	11.3	19.9	50.0	19.7	40.9	50.0	50.0	0.0	0.0	16.1
Total	95	20,120	100.0	18,186	22.1	3.2	4.2	17.2	9.5	14.4	19.8	13.7	21.3	40.9	62.1	44.5	0.0	11.6	15.5
Source: 2010 U.S. Census ; 07/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Filter: 07172019BBNB2016 HMDA Submission: Action Date is between 7/1/2016 12:00:00 AM and 9/30/2016 12:00:00 AM or Action Date is between 10/1/2016 12:00:00 AM and 12/31/2016 12:00:00 AM.																			

Washington – 2017/2018 – Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017-18	
	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
Benton-Franklin 2017-18	20	6,429	22.5	9,757	21.6	0.0	4.4	17.7	10.0	16.6	19.5	20.0	25.0	41.3	55.0	43.4	0.0	15.0	10.6
Walla Walla 2017-18	198	44,346	88.0	1,782	22.1	5.6	5.1	15.1	7.1	12.1	22.2	14.1	24.9	40.6	59.6	41.0	0.0	13.6	17.0
Yakima 2017-18	7	1,195	7.9	5,070	20.2	0.0	4.0	18.1	14.3	13.8	20.6	0.0	23.2	41.1	71.4	48.0	0.0	14.3	11.0
Total	225	51,970	100.0	16,609	21.0	4.9	4.4	17.6	7.6	15.3	20.2	14.2	24.4	41.2	59.6	44.5	0.0	13.8	11.4
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Oregon – 2016 – Table Q – Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Umatilla 2016	4	670	100.0	1,264	0.0	0.0	0.0	0.0	0.0	0.0	93.7	100.0	93.4	6.3	0.0	6.6	0.0	0.0	0.0
Total	4	670	100.0	1,264	0.0	0.0	0.0	0.0	0.0	0.0	93.7	100.0	93.4	6.3	0.0	6.6	0.0	0.0	0.0
Source: 2016 D&B Data; 07/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0; Sample size 100%																			

Oregon – 2017/2018 – Table Q – Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Umatilla 2017-18	18	2,917	100.0	961	0.0	0.0	0.0	0.0	0.0	0.0	78.9	66.7	76.4	21.1	33.3	23.6	0.0	0.0	0.0
Total	18	2,917	100.0	961	0.0	0.0	0.0	0.0	0.0	0.0	78.9	66.7	76.4	21.1	33.3	23.6	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size 100%																			

Washington – 2016 – Table Q – Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Benton-Franklin 2016	7	1,545	20.0	5,561	6.5	0.0	4.3	25.9	28.6	23.9	32.5	28.6	32.0	34.5	42.9	39.6	0.6	0.0	0.3
Walla Walla 2016	21	2,902	60.0	1,080	0.0	0.0	0.0	23.2	4.8	18.2	53.7	66.7	50.9	23.0	28.6	30.8	0.1	0.0	0.0
Yakima 2016	7	1,348	20.0	4,828	8.3	14.3	4.9	29.0	0.0	20.4	33.1	71.4	36.5	29.6	14.3	38.2	0.0	0.0	0.0
Total	35	5,795	100.0	11,469	6.4	2.9	4.1	26.8	8.6	21.9	35.4	60.0	35.6	31.1	28.6	38.2	0.3	0.0	0.2
Source: 2016 D&B Data; 07/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size of BenFrank AA = 100%, WWAA = 21 loans, YakAA=100%																			

Washington – 2017/2018 – Table Q – Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Benton-Franklin 2017-18	20	2,483	37.0	3,554	1.3	0.0	1.2	29.3	50.0	29.0	37.6	35.0	36.0	31.4	15.0	33.4	0.5	0.0	0.4
Walla Walla 2017-18	21	4,823	38.9	793	5.8	0.0	5.7	16.3	4.8	17.4	63.4	81.0	62.7	14.4	14.3	14.3	0.1	0.0	0.0
Yakima 2017-18	13	3,692	24.1	2,809	0.0	7.7	0.0	29.0	30.8	23.9	39.3	23.1	43.4	31.7	38.5	32.8	0.0	0.0	0.0
Total	54	10,999	100.0	7,156	1.4	1.9	1.2	27.5	27.8	25.7	41.5	50.0	41.9	29.4	20.4	31.0	0.2	0.0	0.2
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size for BenFrank AA= 20 loans, WWAA= 21 loans, and YakAA=100% of small loans to businesses.																			

Oregon – 2016 - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Umatilla 2016	4	670	100.0	1,264	81.1	100.0	45.2	4.9	0.0	13.9	0.0
Total	4	670	100.0	1,264	81.1	100.0	45.2	4.9	0.0	13.9	0.0
<i>Source: 2016 D&B Data; 07/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size =</i>											

Oregon – 2017/2018 - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Umatilla 2017-18	18	2,917	100.0	961	81.0	77.8	53.5	5.0	22.2	14.0	0.0
Total	18	2,917	100.0	961	81.0	77.8	53.5	5.0	22.2	14.0	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size =</i>											

Washington – 2016 - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Benton-Franklin 2016	7	1,545	20.0	5,561	82.7	71.4	38.4	5.0	28.9	12.4	0.0
Walla Walla 2016	21	2,902	60.0	1,080	84.1	76.2	41.2	4.5	14.3	11.3	9.5
Yakima 2016	7	1,068	20.0	4,828	80.8	71.4	38.4	6.1	28.9	13.1	0.0
Total	35	5,994	100.0	11,469	82.1	74.3	38.7	5.4	20.0	12.5	5.7
<i>Source: 2016 D&B Data; 07/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size=</i>											

Washington – 2017/2018 - Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Benton-Franklin 2017-18	20	2,483	37.0	3,554	82.7	75.0	50.6	4.9	25.0	12.3	0.0
Walla Walla 2017-18	21	4,823	38.9	793	83.8	85.7	52.0	4.4	14.3	11.7	0.0
Yakima 2017-18	13	3,692	24.1	2,809	79.9	69.2	53.4	6.3	30.8	13.8	0.0
Total	54	10,999	100.0	7,156	81.8	77.8	51.8	5.4	22.2	12.8	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 Sample size =</i>											