PUBLIC DISCLOSURE

April 27, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Alpine Bank
Certificate Number: 23091

2200 Grand Avenue
Glenwood Springs, Colorado 81601

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

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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

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INSTITUTION RATING

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

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

PERFORMANCE LEVELS	**PERFORMANCE TESTS**		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
** The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating*			

The Lending Test is rated High Satisfactory.

- Lending levels reflect excellent responsiveness to AA credit needs.
- A substantial majority of loans are made in the institution's AAs.
- The geographic distribution of loans reflects adequate penetration throughout the AAs.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.
- The institution is a leader in making community development (CD) loans.
- The institution exhibits adequate record of serving the credit needs of the most economically disadvantaged areas of its AAs, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

The Investment Test is rated Outstanding.

- The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

- The institution exhibits excellent responsiveness to credit and CD needs.
- The institution occasionally uses innovative and/or complex investments to support CD initiatives.

The Service Test is rated Outstanding.

- Delivery systems are reasonably accessible to essentially all portions of the institution's AAs.
- To the extent changes have been made, the institution's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- or moderate-income individuals.
- Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly low- and moderate-income geographies and/or individuals.
- The institution is a leader in providing CD services.

DESCRIPTION OF INSTITUTION

Alpine Bank (AB), established in 1980, maintains its headquarters in Glenwood Springs, Colorado. Alpine Banks of Colorado, a one-bank holding company, also located in Glenwood Springs, wholly owns the bank. This evaluation does not consider any affiliate or subsidiary activity. The bank received a Satisfactory rating at its previous evaluation dated August 7, 2023, based on Federal Financial Institutions Examination Council (FFIEC) Large Institution CRA Examination Procedures performed by the Federal Deposit Insurance Corporation (FDIC).

AB continues to function as a retail bank primarily focusing on home mortgage and commercial lending. The bank did not participate in any merger or acquisition activity since the prior evaluation. The bank operates 39 full-service offices, 5 limited-service offices, and one loan production office in Colorado. The bank closed the Copper Mountain Branch, located in a middle-income census tract, in July 2024. The bank also closed the Aurora loan production office and opened the Aurora Branch, located in a low-income census tract, in December 2024.

AB offers a variety of products and services for consumers and businesses. The bank continues to offer home mortgage, commercial, construction, consumer, and home equity loans as well as consumer and commercial lines of credit, and credit cards. Deposit services include checking, savings, time deposits, health savings, debit and payroll cards, and individual retirement accounts. Most locations either offer self-storage boxes or safe deposit boxes. Alternative delivery systems include online and mobile banking with bill pay capabilities, remote deposit capture, and 49 bank-owned ATMs. Additionally, customers have access to 55,000 surcharge-free ATMs through the Allpoint network.

As of December 31, 2025, Reports of Condition and Income, AB reported total assets of nearly $6.9 billion, total loans of $4.3 billion, total securities of $1.8 billion, and total deposits of $6.1 billion. Since the previous evaluation, total assets increased by 5.4 percent, total loans increased by 7.6

percent, and total deposits increased by 5.1 percent. As reflected in the following table, the mix of outstanding loans shows that home mortgage and commercial lending represent the two largest categories.

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	506,294	11.7
Secured by Farmland	34,019	0.8
Secured by 1-4 Family Residential Properties	1,936,757	44.6
Secured by Multifamily (5 or more) Residential Properties	174,493	4.0
Secured by Nonfarm Nonresidential Properties	1,346,013	31.0
Total Real Estate Loans	**3,997,576**	**92.1**
Commercial and Industrial Loans	151,709	3.5
Agricultural Production and Other Loans to Farmers	37	0.0
Consumer Loans	55,659	1.3
Obligations of State and Political Subdivisions in the U.S.	80,251	1.8
Other Loans	47,282	1.1
Lease Financing Receivable (net of unearned income)	21,955	0.5
Less: Unearned Income	(10,901)	(0.3)
Total Loans	**4,343,568**	**100.0**
Source: Reports of Condition and Income		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet its AAs' credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which CRA performance will be evaluated. The following table shows that AB designated eight AAs consisting of 20 counties in the State of Colorado. The AAs meet the technical requirements of the CRA.

Description of Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Mountain Zone Non-MSA	Eagle, Garfield, Pitkin, Routt, and Summit	56	20
San Juan Zone Non-MSA	Delta, Montrose, Ouray, and San Miguel	27	5
Southwest Zone Non-MSA	La Plata	12	2
Grand Junction MSA	Mesa	33	5
Denver-Aurora-Centennial MSA	Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson	688	4
Boulder MSA	Boulder	78	1
Fort Collins MSA	Larimer	86	1
Colorado Springs MSA	El Paso	167	1
Source: Bank Data; 2020 U.S. Census Data			

The three Non-MSA AAs are not contiguous. However, examiners did not identify any significant anomalies in performance when assessed separately within each AA, and the AAs reflect similar economic and demographic conditions. Therefore, examiners combined performance among the three separate Non-MSA AAs for presentation purposes.

Numerous Enterprise Zone (EZ) designations exist within portions of each of the bank's AAs, except for the Boulder MSA AA and the Fort Collins MSA AA. The enterprise zones have high unemployment, low per capita income, or slow population growth. The EZ program provides incentives for private enterprises to expand and for new businesses to locate in economically distressed areas of the state. Businesses located in an EZ may qualify for tax credits and incentives to encourage job creation and investment in these zones. Refer to the individual AA sections for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated August 7, 2023, to the current evaluation dated April 27, 2026. To assess performance, examiners applied the FFIEC Large Institution CRA Examination Procedures, which include the Lending, Investment, and Service Tests. The appendices list the tests' criteria.

Examiners applied full-scope procedures to the Combined Non-MSA AA because this area contains a majority of the bank's total loans, deposits, and branches. Examiners also applied full-scope procedures to the Grand Junction MSA AA since this AA did not receive a review using full-scope procedures during the prior two evaluations. This AA also contains the third highest level of lending and second largest level of deposits; the area also noted a slight increase in both lending and deposits since the previous evaluation. Examiners applied limited-scope procedures to the Denver-Aurora-Centennial MSA AA because this AA was reviewed using full-scope procedures at one of the previous two evaluations. Examiners applied limited-scope procedures to the remaining AAs because these areas reflect nominal activity for the bank.

The following table shows that the Combined Non-MSA AA generated a majority of the bank's loans and deposits and contains the most branches. Consequently, examiners weighed records in the Combined Non-MSA AA significantly heavier when arriving at applicable conclusions and ratings. The Denver-Aurora-Centennial MSA AA received notably less weight, followed by the Grand Junction MSA AA, the Boulder MSA AA, and the Colorado Springs MSA AA. The Fort Collins MSA AA received the least weight.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	\$(000s)	**%**	**\$(000s)**	**%**	**#**	**%**
Mountain Zone Non-MSA	1,105,218	59.5	3,369	57.1	20	51.3
San Juan Zone Non-MSA	178,979	9.6	871	14.8	5	12.8
Southwest Zone Non-MSA	91,155	4.9	327	5.5	2	5.1
Combined Non-MSA	**1,375,352**	**74.0**	**4,567**	**77.4**	**27**	**69.2**
Denver-Aurora-Centennial MSA	222,514	12.0	455	7.7	4	10.3
Grand Junction MSA	152,786	8.2	765	13.0	5	12.8
Boulder MSA	55,395	3.0	76	1.3	1	2.6
Colorado Springs MSA	33,694	1.8	21	0.4	1	2.6
Fort Collins MSA	17,336	0.9	19	0.3	1	2.6
Total	**1,857,077**	**100.0**	**5,903**	**100.0**	**39**	**100.0**
Source: 2023-2025 CRA & HMDA Data; FDIC Summary of Deposits (06/30/2025). Due to rounding, totals may not equal 100.0 percent						

<u>Activities Reviewed</u>

For the Lending Test, CRA Large Institution Examination Procedures require examiners to consider a bank's reported home mortgage, small business, and small farm loans since the previous evaluation, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers the following total loans reported according to either the Home Mortgage Disclosure Act (HMDA) or CRA data collection reporting requirements.

<u>Home Mortgage Loans (total loans reported inside and outside of the AAs)</u>

- 2023 – 1,126 loans totaling \$453,010,000
- 2024 – 1,212 loans totaling \$485,050,000
- 2025 – 1,509 loans totaling \$623,539,000

<u>Small Business (total loans reported inside and outside of the AAs)</u>

- 2023 – 689 loans totaling \$101,238,000
- 2024 – 739 loans totaling \$119,564,000
- 2025 – 816 loans totaling \$133,883,000

Small Farm (total loans reported inside and outside of the AAs)

- 2023 – 2 loans totaling $638,000
- 2024 – 4 loans totaling $416,000
- 2025 – 4 loans totaling $1,100,000

Community Development Loans

August 7, 2023 – April 27, 2026: 63 loans totaling $281,080,000

Based on the lending activity noted above, small farm loans account for an insignificant portion of the total reportable loans. Additionally, the bank does not report consumer loans. Consequently, examiners did not select these products for CRA review since inclusion would not materially affect conclusions or ratings.

Examiners considered the universe of loans reviewed by number and dollar volume, as well as management's stated business strategy, to determine the weighting applied to the loan categories reviewed. As suggested by the above figures and given the larger volume, home mortgage loans received the heaviest weighting when arriving at applicable conclusions for the bank, and in each AA. Examiners emphasized performance by number of loans because it is a better indicator of the number of individuals and businesses served.

Since no significant trends exist between the different years' data that materially affect applicable conclusions or ratings, this evaluation only presents loan data for 2024, the most recent year for which corresponding aggregate data exists as of this evaluation date. However, examiners presented all years of loan data reviewed under the AA Concentration criterion. Examiners primarily compared the bank's performance to applicable aggregate data when reaching overall conclusions and ratings.

The scopes for the Investment and Service Tests consider applicable current period CD activities, including qualified investments (QIs) and CD services. Current period activities involve those generated since the previous evaluation. The Investment Test's scope further encompasses all prior period QIs, which include those purchased prior to the previous evaluation but still outstanding as of this evaluation's date. Examiners use the book value as of the current evaluation date for all prior period QIs. For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings and closings during the evaluation period. The review evaluated retail banking products and services targeted toward low- and moderate-income individuals or small businesses and/or tailored to meet specific needs within the AAs.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

AB demonstrated a high satisfactory record for the bank as a whole regarding the Lending Test. Excellent lending activity, a substantial majority of loans within the AAs, extensive use of innovative and flexible lending programs, and a leader level of CD loans hampered by adequate records regarding geographic distribution and borrower profile support the overall performance record. Conclusions proved consistent for each AA except for the Boulder MSA AA, where performance fell below the institution level.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. An excellent record regarding home mortgage and small business lending supports this conclusion. Conclusions proved consistent in the Combined Non-MSA and Grand Junction MSA AAs, while performance in the Denver-Aurora-Centennial MSA AA, Boulder MSA AA, Colorado Springs MSA AA, and Fort Collins MSA AA proved inconsistent, falling below the institution level. Examiners considered the bank's size, business strategy, and capacity relative to the AAs' credit needs when arriving at this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to AA credit needs. Excellent overall market ranking supports this conclusion. For 2024, the bank originated 1,162 reportable home mortgage loans totaling $470.7 million in its combined AAs. AB captured 0.8 percent of the market share by number and 0.8 percent of the market share by dollar volume of loans. This volume of activity ranks the bank 25th out of 892 total lenders, which lands in the top 2.8 percent of lenders reporting such loans in the bank's AAs, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect excellent responsiveness to AA credit needs. Excellent overall market ranking supports this conclusion. For 2024, the bank originated 709 reportable small business loans totaling approximately $116.3 million inside its combined AAs. AB captured 0.4 percent of the market share by number and 2.5 percent market share of the dollar volume of loans. This volume of activity ranks the bank 17th out of 270 total lenders in the bank's AAs. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 6.3 percent of lenders reporting such loans in the bank's AAs.

Assessment Area Concentration

A substantial majority of loans are made in the institution's AAs. Substantial majorities of home mortgage and small business loans originated in the AAs support this conclusion. Examiners considered the bank's asset size and office structure as well as the loan categories reviewed relative to the areas' combined size and economy when arriving at this conclusion.

Lending Inside and Outside of the Assessment Area										
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000)**				**Total $(000)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Home Mortgage										
2023	1,082	96.1	44	3.9	1,126	441,350	97.4	11,660	2.6	453,010
2024	1,162	95.9	50	4.1	1,212	470,670	97.0	14,380	3.0	485,050
2025	1,444	95.7	65	4.3	1,509	605,780	97.2	17,759	2.8	623,539
Subtotal	**3,688**	**95.9**	**159**	**4.1**	**3,847**	**1,517,800**	**97.2**	**43,799**	**2.8**	**1,561,599**
Small Business										
2023	661	95.9	28	4.1	689	96,044	94.9	5,194	5.1	101,238
2024	709	95.9	30	4.1	739	116,274	97.2	3,290	2.8	119,564
2025	772	94.6	44	5.4	816	124,805	93.2	9,078	6.8	133,883
Subtotal	**2,142**	**95.5**	**102**	**4.5**	**2,244**	**337,123**	**95.0**	**17,562**	**5.0**	**354,685**
Source: 2023-2025 HMDA and CRA Reported Data										

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AAs. Adequate records in the Combined Non-MSA AA and the Grand Junction MSA AA primarily support this conclusion. The Denver-Aurora-Centennial, Boulder, and Fort Collins MSA AAs reflect consistent performance, while the Colorado Springs MSA AA reflects inconsistent performance and exceeds the institution level. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at conclusions. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts in the AAs when arriving at conclusions.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate performances in the Combined Non-MSA AA and Grand Junction MSA AA primarily support this conclusion. The Denver-Aurora-Centennial, Colorado Springs, and Fort Collins MSA AAs reflect consistent performance, while the Boulder MSA AA reflects inconsistent performance by falling below the institution level. Examiners considered the loan product types relative to the available comparative data and any performance context issues when arriving at conclusions. Examiners focused on the percentage by number of loans to low- and moderate-income borrowers and to businesses with gross annual revenue of $1 million or less in the AAs when arriving at conclusions.

Innovative or Flexible Lending Practices

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices support this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. Examiners analyzed performance for this criterion at the institution level, as the bank offers most of its innovative and/or flexible lending programs throughout all AAs unless otherwise noted.

Since the previous evaluation, the bank originated 337 innovative and/or flexible loans totaling nearly $47.4 million. This dollar figure equates to 0.7 percent of average total assets of $6.6 billion since the previous evaluation and 1.2 percent of average net loans of $4.1 billion for the same period. These levels increased over the 94 innovative and/or flexible loans totaling $35.4 million, representing 0.6 percent of average total assets and 1.0 percent of average net loans, reported at the previous evaluation.

AB developed and implemented the Lender Credit and the In-House Low- and Moderate-Income (LMI) Mortgage products to better assist low- and moderate-income borrowers in obtaining homeownership. Additionally, the bank modified its existing mobile home loan product, which positively impacted low- and moderate-income borrowers during the evaluation period. These innovative programs demonstrate the bank's excellent responsiveness to the significant affordable housing credit needs across all AAs.

Innovative or Flexible Lending Programs
Institution

Type of Program	2023 (Partial)		2024		2025		YTD 2026		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Lender Credit Program	0	0	20	141	77	473	22	138	**119**	**752**
Mobile Home Product	0	0	25	2,105	80	9,503	16	1,547	**121**	**13,155**
In-House LMI Mortgage Product	0	0	0	0	16	6,608	11	3,967	**27**	**10,575**
Government Home Loan Programs (CHFA, CHFA 2nd, VA, FHA)	6	2,094	14	5,667	17	6,068	1	458	**38**	**14,287**
Commercial Programs (SBA 504 and 7A)	0	0	2	4,284	0	0	2	1,454	**4**	**5,738**
Employee Housing Loans	1	203	5	1,507	4	1,093	0	0	**10**	**2,803**
Furlough Loans	0	0	0	0	16	67	2	5	**18**	**72**
Totals	**7**	**2,297**	**66**	**13,704**	**210**	**23,812**	**54**	**7,569**	**337**	**47,382**

Source: Bank Data

The following details the innovative or flexible lending programs offered:

Lender Credit Program – AB developed and implemented the Lender Credit Program in July 2024 because of the high-interest rate environment combined with the high cost of housing in Colorado. The program offers a lender credit of up to $7,500 to low- and moderate-income borrowers to buy down the interest rate and/or offset closing costs, increasing purchasing power and reducing financing costs.

Mobile Home Product – Due to the high cost of housing in many of the AAs, mobile homes represent one of the few sources of affordable housing. The bank responded to the identified credit need by modifying the existing mobile home loan product to lend up to 90 percent of the appraised value. Of the 25 mobile home loans originated in 2024, 52.0 percent were to low- and moderate-income borrowers. Similarly, of the 80 mobile home loans originated in 2025, 58.8 percent were to low- and moderate-income borrowers. In the first quarter of 2026, 81.3 percent of the 16 mobile homes originated benefited low- and moderate-income borrowers.

In-House LMI Mortgage Product – The bank structured this product to provide financing options to borrowers with incomes less than 80 percent of the area median income in the Boulder MSA AA, the Colorado Springs MSA AA, the Denver-Aurora-Centennial MSA AA, and the Fort Collins MSA AA, also known as the Front Range, due to the highly competitive market in these AAs. The In-House LMI Mortgage Product is a first mortgage with discounted interest rates, a $1,000 down payment, and no private mortgage insurance required. The interest rate can be further reduced with a five percent down payment. The bank also offers a second mortgage with a 20 percent down payment subordinate to a secondary-market first lien mortgage with a 30-year term and an interest rate that matches the first mortgage.

Government Home Loan Programs – AB participates in the Colorado Housing and Financial Authority (CHFA) mortgage loan program. The program aids first-time homebuyers. Interest rates offered normally fall below conventional or Federal Housing Authority (FHA) rates. In addition, the borrower receives a three percent CHFA benefit at closing. The benefit nets against closing costs and down payment to effectively give the borrower a mortgage at 95 to 100 percent loan-to-value. Through a well-established secondary market mortgage program, the bank offers additional flexibility and attractive terms to eligible borrowers through the availability of FHA and Veterans Administration (VA) government programs.

Commercial Programs – The bank offers commercial loans through the Small Business Administration (SBA) 504 and 7A loan programs. These programs have flexible features, such as higher guaranties and lower down payments, and help small businesses that may not qualify for conventional credit.

Employee Housing Loans – AB developed a loan program for its employees throughout its AAs wanting to enter the housing market. The program offers loans up to 100 percent loan-to value for any employee who cannot qualify for conventional financing. Safe and sound underwriting requirements are established. These loans are provided with no points or closing costs except for necessary third-party fees. In December of 2025, the bank offered three pricing options, including one offering rates to align with secondary market rates for more beneficial pricing options.

Furlough Loans - During the government shutdown, AB developed a special ready reserve for current customers that had been furloughed equal to one month's worth of net pay. It was interest and payment free during the shutdown and for 45 days after the government reopened. After 45 days, the rate increased back to the regular rate.

Community Development Loans

The institution is a leader in making CD loans. The bank's excellent level of CD loans and its excellent responsiveness to CD needs support this conclusion. The bank demonstrated consistent performance in all AAs except for the Boulder MSA AA where the bank's performance fell below the institution level.

The following table shows that the bank originated 63 CD loans totaling approximately $281.1 million in its AAs or statewide during the evaluation period. This level equates to 4.3 percent of average total assets since the prior evaluation and 6.9 percent of average net loans for the same period. These levels represent a decrease from the 117 CD loans totaling $329.5 million, or 5.5 percent of average total assets and 8.3 percent of average net loans reported at the previous evaluation but still reflective of an excellent level. The following tables show the bank's CD lending by AA, year, and purpose.

Community Development Lending by Assessment Area Institution										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Combined Non-MSA	9	126,236	5	12,600	2	2,600	2	9,935	**18**	**151,371**
Denver-Aurora-Centennial MSA	2	2,750	1	2,000	2	2,430	12	41,668	**17**	**48,848**
Grand Junction MSA	2	1,028	1	1,500	4	5,200	6	17,640	**13**	**25,368**
Boulder MSA	0	0	0	0	0	0	2	3,892	**2**	**3,892**
Colorado Springs MSA	1	11,000	0	0	0	0	6	14,830	**7**	**25,830**
Fort Collins MSA	0	0	0	0	1	7,500	1	1,525	**2**	**9,025**
Broader Statewide	2	14,371	0	0	0	0	2	2,375	**4**	**16,746**
Total	**16**	**155,385**	**7**	**16,100**	**9**	**17,730**	**31**	**91,865**	**63**	**281,080**
Source: Bank Data										

Community Development Lending Institution										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
2023 (partial)	0	0	1	1,500	2	2,430	1	1,282	**4**	**5,212**
2024	8	93,700	3	6,100	3	10,700	13	28,357	**27**	**138,857**
2025	8	61,685	3	8,500	2	2,100	15	54,700	**28**	**126,985**
YTD 2026	0	0	0	0	2	2,500	2	7,526	**4**	**10,026**
Total	**16**	**155,385**	**7**	**16,100**	**9**	**17,730**	**31**	**91,865**	**63**	**281,080**
Source: Bank Data										

The CD loans also reflect excellent responsiveness to AA's CD needs. As seen in the previous tables, a substantial majority of the dollar volume of loans, or 87.9 percent, promoted affordable housing and revitalization and stabilization efforts which are identified CD needs. In addition, the bank originated CD loans that benefited community services and promoted economic development, which further demonstrates responsiveness to identified needs throughout the AAs. Most CD loans benefited the bank's primary service area, the Combined Non-MSA AA, followed by the Denver-Aurora-Centennial MSA AA.

The following describes an example of the bank's broader statewide CD loan activities:

- ***Revitalize and Stabilize*** **–** The bank originated one loan totaling $1.4 million to finance renovations on a 3-story, 9-unit multi-family building located in a low-income census tract in Weld County, Colorado. The loan proceeds aid in attracting and retaining new and existing residents in the area.

INVESTMENT TEST

AB demonstrated an outstanding record for the bank as a whole regarding the Investment Test. The excellent level of qualified CD investments and grants combined with the excellent responsiveness to credit and CD needs outweighed the occasional use of innovative and/or complex investments to support this conclusion. Conclusions regarding the institution's overall Investment Test performance proved consistent in the Grand Junction MSA AA, Denver-Aurora-Centennial MSA, Boulder MSA, Colorado Springs MSA and Fort Collins MSA AAs, while performance in the Combined Non-MSA AA fell below the institution level.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. As seen in the following table, the bank made use of 1,055 qualified CD investments and grants totaling approximately $220.3 million. This represents 3.3 percent of average total assets and 11.9 percent of average total securities of $1.8 billion since the previous evaluation. These levels represent an increase from the 812 qualified investments totaling $168.5 million, or 2.8 percent of average total assets and 11.4 percent of average total securities reported at the previous evaluation. The following table summarizes the bank's qualified investments by AA and purpose.

Qualified Investments by Assessment Area Institution										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Combined Non-MSA	44	18,927	314	1,541	104	1,078	13	5,146	**475**	**26,692**
Denver-Aurora-Centennial MSA	16	20,882	135	12,955	40	2,494	31	35,346	**222**	**71,677**
Grand Junction MSA	8	5,152	94	576	49	556	15	14,253	**166**	**20,537**
Boulder MSA	0	0	30	2,243	1	7	1	1,889	**32**	**4,139**
Colorado Springs MSA	4	3,460	26	123	22	1,579	3	538	**55**	**5,700**
Fort Collins MSA	2	18	23	76	0	0	8	8,263	**33**	**8,357**
Broader Statewide/Regional	0	0	4	5,694	2	54	31	33,397	**37**	**39,145**
Nationwide	2	8,266	17	19,172	2	4,929	14	11,726	**35**	**44,093**
Total	**76**	**56,705**	**643**	**42,380**	**220**	**10,697**	**116**	**110,558**	**1,055**	**220,340**
Source: Bank Data										

The following lists notable examples of the institution's nationwide and broader regional/statewide qualified investment activities:

- ***Affordable Housing*** –The bank invested $6.2 million in new mortgage-backed securities with underlying loans to finance single-family housing for low- and moderate-income individuals. The investment benefited the nationwide area.

- ***Community Services*** – The bank maintained four prior period investments with a current book value of $7.6 million in the Pueblo School Districts. The investment helped maintain district facilities for schools where a majority of students qualify for free and reduced lunch in the broader statewide area.

- ***Economic Development*** **–** The bank maintained a prior period qualified investment in a nationwide Small Business Investment Company (SBIC) with a current book value of $4.0 million. The SBIC utilizes capital and money borrowed from the SBA to supply small businesses with equity and debt financing.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs. As reflected in the above table, a majority of the qualified CD investments and grants funded affordable housing and targeted revitalization and stabilization efforts, both of which address identified CD needs. In addition, the bank made qualified investments and donations that benefited community services and promoted economic development, which further demonstrates excellent responsiveness to identified needs throughout the AAs.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives. Examples of complex investments include three Equity Equivalent (EQ2) investments in three different Community Development Financial Institution (CDFI) loan funds, four investments in two different SBICs, and three different low-income housing tax credits (LIHTC). EQ2 investments are investment products that allow banks to invest in CDFIs that provide CD services throughout their communities. The LIHTC Program incentivizes CD by issuing tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to low-income households. Investments through these programs offer varying degrees of complexity involving special expertise needed by staff and a significant amount of time to coordinate the financing process.

SERVICE TEST

AB demonstrated an outstanding record for the bank as a whole regarding the Service Test. The leader level of CD services and the changes in branch locations that improved accessibility of delivery systems sufficiently lifted the reasonably accessible delivery systems to essentially all portions of the bank's AAs and the services that do not vary in a way that inconveniences portions of the AAs to support this conclusion. Conclusions proved consistent in all AAs.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's AAs. Reasonably accessible branch distribution and reasonably accessible alternative delivery systems to low- and moderate-income individuals and geographies support this conclusion.

The table below shows that the bank's branch distribution in low-income census tracts falls 1.3 percentage points below the population in these tracts, reflecting reasonable accessibility. The bank's distribution of branches in moderate-income census tracts trails the population percentage by 13.5 percentage points, typically reflecting limited accessibility. However, further analysis of the branch distribution revealed that all low-income census tracts reside within the MSA AAs. Additionally, the MSA AAs contain 98.1 percent of the moderate-income census tracts. Twelve of the bank's 39 branches operate in the MSA AAs. Given the bank's more limited branching footprint within the MSA AAs, the branch distribution reflects reasonable accessibility.

Branch and ATM Distribution by Geography Income Level Institution								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	47	4.1	189,313	3.9	1	2.6	1	2.0
Moderate	263	22.9	1,145,841	23.8	4	10.3	5	10.2
Middle	451	39.3	1,862,337	38.7	16	41.0	21	42.9
Upper	360	31.4	1,573,919	32.7	16	41.0	20	40.8
NA	26	2.3	42,793	0.9	2	5.1	2	4.1
Total	**1,147**	**100.0**	**4,814,203**	**100.0**	**39**	**100.0**	**49**	**100.0**
Source: 2020 U.S. Census Data; Bank Data								

Besides its full-service office locations, the bank provides alternative delivery systems institution-wide that include online and mobile banking with bill pay capabilities and remote deposit capture. The bank's online banking platform allows the user to toggle from English to Spanish. To enhance the ATM network accessibility listed above, customers can access 55,000 surcharge-free ATMs through the Allpoint ATM network, of which 35 percent are located in low- and moderate-income census tracts within the bank's combined AAs. Further, AB offers free, 24-hour customer access to accounts via a toll-free telephone number. The bank provides this service in both English and Spanish. In addition, customers can apply online for a Consumer Ready Reserve, credit card, or auto loan as well as a deposit account. These alternative delivery services remain consistent throughout all AAs. Consequently, the alternative delivery systems complement the reasonably accessible branch distribution in low- and moderate-income geographies.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or to low- and moderate-income individuals. Since the previous evaluation, the bank opened one branch located in a moderate-income census tract in the Denver-Aurora-Centennial MSA AA and closed one branch located in a middle-income census tract in the Combined Non-MSA AA, resulting in a positive impact.

Reasonableness of Business Hours and Services

Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly low- and moderate-income geographies and/or individuals. The institution maintains hours and services typical for the areas served and the industry. Most locations maintain at least 8-hour lobby hours Monday through Thursday with slightly extended hours on Friday. The bank also offers limited Saturday hours accessible through either the lobby or drive-thru facilities at 18 locations.

Community Development Services

The institution is a leader in providing CD services. The leader level of CD services combined with excellent responsiveness to available opportunities support this conclusion.

Bank employees provided 773 CD services since the previous evaluation. This is a significant increase from the 305 CD services noted at the previous evaluation.

CD services demonstrate excellent responsiveness in addressing CD needs. As reflected in the tables below, 68.5 percent of the bank's CD services benefited organizations that provide community services targeted to low- and moderate-income individuals, as well as services that benefited organizations providing affordable housing, promoting economic development, and targeting revitalization and stabilization efforts. Such services represent identified CD needs in the bank's AAs. CD services demonstrated leadership through Board or committee participation and through employees teaching numerous financial education programs on a variety of financial topics. The following tables detail CD services by rated area, purpose, and year.

Community Development Services by Assessment Area Institution					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
Combined Non-MSA	41	221	68	8	**338**
Denver-Aurora-Centennial MSA	5	132	63	2	**202**
Grand Junction MSA	10	105	27	0	**142**
Boulder MSA	0	36	0	0	**36**
Colorado Springs MSA	0	19	19	0	**38**
Fort Collins MSA	0	17	0	0	**17**
Total	**56**	**530**	**177**	**10**	**773**
Source: Bank Data					

Community Development Services Institution					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
2023 (Partial)	19	121	39	1	**180**
2024	14	154	44	3	**215**
2025	13	156	57	4	**230**
YTD 2026	10	99	37	2	**148**
Total	**56**	**530**	**177**	**10**	**773**
Source: Bank Data					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

COMBINED NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN COMBINED NON-MSA AA

The Combined Non-MSA AA includes all 95 census tracts that make up the following counties: Delta, Eagle, Garfield, La Plata, Montrose, Ouray, Pitkin, Routt, San Miguel, and Summitt. AB operates 27 branches and 33 ATMs in this AA. The Combined Non-MSA AA ranks first among the bank's six AAs by accounting for 74.0 percent of loans and 77.4 percent of deposits and operating 69.2 percent of the branches.

Economic and Demographic Data

The Combined Non-MSA AA's 95 census tracts reflect the following income designations based on 2020 U.S. Census Data: 5 moderate-, 41 middle-, and 48 upper-income census tracts and one census tract without an income designation. Two census tracts in Ouray County and two census tracts in San Miguel County were designated as underserved the entire evaluation period, while Delta County had six census tracts designated as underserved in 2025. Although the geographic boundaries of the AA remain the same since the previous evaluation, the number of census tracts increased based on 2020 U.S. Census Data information. The following table illustrates select demographic, housing, and business information for the Combined Non-MSA AA.

Demographic Information of the Assessment Area Combined Non-MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	95	0.0	5.3	43.2	50.5	1.1
Population by Geography	333,117	0.0	4.0	47.2	48.1	0.7
Housing Units by Geography	189,255	0.0	4.1	42.3	52.8	0.7
Owner-Occupied Units by Geography	88,974	0.0	4.0	49.2	46.3	0.5
Occupied Rental Units by Geography	37,405	0.0	5.3	43.4	49.4	1.9
Vacant Units by Geography	62,876	0.0	3.5	32.0	64.0	0.5
Businesses by Geography	71,083	0.0	3.4	37.0	59.0	0.7
Farms by Geography	2,193	0.0	6.9	53.6	39.2	0.3
Family Distribution by Income Level	80,810	15.8	14.5	21.0	48.7	0.0
Household Distribution by Income Level	126,379	18.5	14.1	17.5	49.8	0.0
Colorado Non-MSA Median Family Income		$72,390	Median Housing Value			$ 506,180
			Median Gross Rent			$1,252
			Families Below Poverty Level			6.3%
Source: 2020 U.S. Census Data; 2025 D&B Data; (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent						

EZ designations exist within portions of the Combined Non-MSA AA, encompassing Delta, Garfield, La Plata, Montrose, Ouray, Routt, and San Miguel counties. Each EZ maintains its own written objectives and approved projects. Additionally, Enhanced Rural Enterprise Zones include Delta, Routt, and portions of Montrose and San Miguel counties. This program provides greater tax credits to businesses when promoting new job creation in the designated rural areas.

According to the Colorado Office of Economic Development and International Trade, the largest employers throughout the Combined Non-MSA AA include Pioneers Medical Center, Tri-State Generation and Transmission, Mountain Valley Bank, Vail Resorts, Centura Health, Purgatory, and Rocky Mountain Chocolate Factory.

The following table reflects unemployment rates over the evaluation period for counties in the Combined Non-MSA AA, State of Colorado, and nationwide. The unemployment rates for the counties in the Combined Non-MSA AA were generally in line with the statewide and nationwide rates.

Annual Unemployment Rates Combined Non-MSA			
Area	**2023**	**2024**	**2025**
	%	**%**	**%**
Delta County	4.9	6.1	4.7
Eagle County	3.0	3.6	2.8
Garfield County	3.1	3.6	2.6
La Plata County	3.6	4.2	3.1
Montrose County	4.0	4.9	3.7
Ouray County	3.3	5.5	4.3
Pitkin County	3.0	3.9	2.3
Routt County	2.9	3.5	2.6
San Miguel County	3.8	4.6	3.4
Summit County	2.4	3.0	2.3
State of Colorado	3.6	4.2	3.6
Nationwide	3.8	4.1	4.4
Source: Bureau of Labor Statistics			

The following table shows the applicable FFIEC-estimated median family income levels used to analyze home mortgage loans under the borrower profile criterion and to qualify certain CD activities in the Combined Non-MSA AA.

Median Family Income Ranges Combined Non-MSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024	$ 94,200	< $47,100	$47,100 to < $75,360	$75,360 to < $113,040	≥ $113,040
Source: FFIEC					

Competition

The AA contains a moderate level of competition from other chartered banks based on the population, with each of the 139 offices from the 25 institutions serving on average approximately 2,397 people. According to the FDIC Deposit Market Share report as of June 30, 2025, AB ranked 1st with 30.7 percent deposit market share.

Community Contact

Examiners reviewed an existing community contact from a local economic development organization, to help assess the current economic conditions, community credit needs, and potential bank involvement in the AA. The organization addresses issues that prevent business growth, such as workforce housing, transportation and transit, workforce development, and broadband access. The contact stated that the economy is good and not declining. The area experienced challenges related to the workforce as the area is somewhat isolated with limited public transportation. Jobs requiring technical skills are especially hard to fill. Housing insecurity, lack of affordable housing, and the lack of ability for locals to purchase housing are major challenges in the area. According to a survey conducted by the contact, the area has a shortage of around 4,500 housing units and expects this number to increase. The contact stated that banks are meeting financing needs in the area and generally serving the community.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners concluded the primary credit needs in the Combined Non-MSA AA include home mortgage and small business loans. Furthermore, as indicated by the demographic and economic data, the AA's CD needs primarily include community services and affordable housing for low- and moderate-income individuals and families. Opportunities also exist for economic development to support opportunities in the designated EZs and for efforts that revitalize and stabilize moderate-income census tracts as well as the designated underserved census tracts in the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN COMBINED NON-MSA AA

LENDING TEST

AB demonstrated a high satisfactory record in the Combined Non-MSA AA regarding the Lending Test. Excellent lending activity combined with a leader level in making CD loans hampered by adequate records regarding geographic distribution and borrower profile supports this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Combined Non-MSA AA when arriving at overall conclusions.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Excellent records regarding home mortgage and small business lending support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the AAs' credit needs when arriving at this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to AA credit needs. Excellent overall market ranking supports this conclusion. For 2024, the bank originated 842 reportable home mortgage loans totaling $369.2 million in the Combined Non-MSA AA. AB ranked 1st out of 440 total lenders, capturing 9.0 percent of the market share by number and 5.2 percent market share by dollar volume of loans.

Small Business Loans
Small business lending levels reflect excellent responsiveness to AA credit needs. For 2024, the bank originated 485 reportable small business loans totaling approximately $71.8 million inside the Combined Non-MSA AA. AB captured 3.1 percent of the market share by number and 14.2

percent of the market share by dollar volume. This volume of activity ranks the bank 8th out of 127 total lenders in the Combined Non-MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 6.3 percent of lenders reporting such loans in the bank's AAs.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Combined Non-MSA AA. Adequate performance regarding home mortgage and small business loans supports this conclusion. The AA does not contain low-income census tracts; therefore, examiners focused on performance in moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration in the Combined Non-MSA AA. Adequate performance in moderate-income geographies supports this conclusion. The following table shows that in moderate-income census tracts, the bank's level of lending trails aggregate data by 2.0 percentage points, reflecting adequate performance.

Geographic Distribution of Home Mortgage Loans Combined Non-MSA						
Tract Income Level	**% of Owner Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	0.0	--	0	0.0	0	0.0
Moderate	4.0	3.3	11	1.3	8,835	2.4
Middle	49.2	45.7	312	37.1	101,230	27.4
Upper	46.3	50.5	513	60.9	258,265	69.9
NA	0.5	0.5	6	0.7	910	0.3
Total	**100.0**	**100.0**	**842**	**100.0**	**369,240**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data						

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Combined Non-MSA AA. Adequate performance in moderate-income geographies supports this conclusion. As seen in the following table, the bank's lending in moderate-income census tracts falls 1.3 percentage points below aggregate data, reflective of adequate performance.

Geographic Distribution of Small Business Loans Combined Non-MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	0.0	--	0	0.0	0	0.0
Moderate	3.4	3.2	9	1.9	1,463	2.0
Middle	36.1	37.8	190	39.2	24,698	34.4
Upper	60.1	58.2	279	57.5	44,250	61.6
NA	0.5	0.8	7	1.4	1,415	2.0
Total	**100.0**	**100.0**	**485**	**100.0**	**71,826**	**100.0**
Source: 2024 D&B Data; 2024 CRA Aggregate Data; 2024 CRA Reported Data; "--" data not available; Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Combined Non-MSA AA. Adequate records regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans based on borrowers' profiles reflects adequate penetration in the Combined Non-MSA AA. Adequate performance to low- and moderate-income borrowers supports this conclusion. As seen in the following table, the bank's lending to low-income borrowers is comparable to aggregate data, reflecting adequate performance. The bank's lending to moderate-income borrowers exceeds aggregate data by 1.2 percentage points, also reflective of adequate performance. In 2025, the bank's performance reflects an increasing trend by number and dollar volume to both low- and moderate-income borrowers. Considering the bank's performance during the entire evaluation period, the borrower profile of home mortgage loans reflects adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Combined Non-MSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	15.8	4.0	33	3.9	10,025	2.7
Moderate	14.5	9.4	89	10.6	16,415	4.5
Middle	21.0	15.2	118	14.0	22,970	6.2
Upper	48.7	54.9	541	64.3	253,105	68.6
NA	0.0	16.5	61	7.2	66,725	18.1
Total	**100.0**	**100.0**	**842**	**100.0**	**369,240**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data; Due to rounding, totals may not equal 100.0 percent						

Small Business Loans
The distribution of borrowers reflects adequate penetration among business customers of different sizes in the Combined Non-MSA AA. Adequate penetration to businesses with gross annual revenue of $1 million or less supports this conclusion. As shown in the following table, the bank's level of lending to small businesses with gross annual revenues of $1 million or less rises 5.4 percentage points above aggregate data, reflecting adequate performance. In 2025, the bank's performance reflects an increasing trend by both number and dollar volume to businesses with gross annual revenues of $1 million or less. Considering the bank's performance during the entire evaluation period, the borrower profile of small business loans reflects adequate performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Combined Non-MSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000	92.6	51.5	276	56.9	26,738	37.2
> $1,000,000	1.8	--	209	43.1	45,088	62.8
Revenue Not Available	5.6	--	0	0.0	0	0.0
Total	**100.0**	**100.0**	**485**	**100.0**	**71,826**	**100.0**
Source: 2024 D&B Data; 2024 CRA Aggregate Data; 2024 CRA Reported Data; "--" data not available						

Community Development Loans

AB is a leader in making CD loans in the Combined Non-MSA AA. The bank granted 18 CD loans totaling $151.4 million in this area. By dollar volume, this equates to 53.9 percent of the bank's overall excellent level of CD loans as compared to the 74.0 percent of the bank's HMDA and CRA reportable loans attributed to this area. Additionally, the dollar volume of CD lending in this AA increased since the previous evaluation where the bank granted 36 CD loans totaling $128.4 million. Besides their extent, the CD loans reflect excellent responsiveness to the AA's CD needs given that the bank originated loans in all four CD categories, with 83.4 percent of the CD loans promoting affordable housing, a significant need in the area.

The following points highlight examples of the bank's CD lending in the Combined Non-MSA AA:

- ***Community Services*** – The bank originated one loan totaling $2.0 million to construct a school and administrative office for an organization that helps low- and moderate-income immigrants learn to read, write, and speak English through group tutoring and literacy workshops.

- ***Affordable Housing*** – The bank extended a construction loan totaling $2.3 million to build a 20-unit residential development in Rifle, Colorado. Applicants must earn less than 80.0 percent of the area's median income, thereby providing affordable housing to low- and moderate-income individuals.

INVESTMENT TEST

AB demonstrated a low satisfactory record in the Combined Non-MSA AA regarding the Investment Test. The adequate level of qualified CD investments and grants combined with good responsiveness and occasional use of innovative and/or complex investments supports this conclusion.

Investment and Grant Activity

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Combined Non-MSA AA. The bank made 475 qualified investments totaling $26.7 million in the Combined Non-MSA AA. By dollar volume, this equates to 12.1 percent of the bank's overall excellent level of qualified investments as compared to 77.4 percent of total deposits attributed to this AA. These levels represent an increase from the 420 qualified investments totaling $14.5 million recorded at the previous evaluation. Further, examiners noted more limited opportunities for qualified investments in the Combined Non-MSA AA.

The following provides examples of qualified investments in the Combined Non-MSA AA:

- ***Affordable Housing*** –The bank invested $1.6 million to construct approximately 50 workforce housing units for teachers and staff who work in the Aspen School District. The average teacher salary in Aspen, Colorado falls below 80 percent of the area median income. The bond will provide an affordable housing option within Aspen, which is considered a high-cost area with limited affordable housing stock.

- ***Community Services*** – The bank donated $45 thousand to an organization that offers a wide variety of enrichment and academic support classes through an afterschool program at five middle schools where 57 percent of the students enrolled in the program qualify for free or reduced lunch.

Responsiveness to Credit and Community Development Needs

The institution exhibits good responsiveness to credit and CD needs in the Combined Non-MSA AA. Qualified investments supported all four CD purpose categories. Specifically, 70.9 percent of the bank's qualified investments provided affordable housing, a stated CD need for the area. To a lesser degree, qualified investments supported organizations providing a variety of community services to low- and moderate-income individuals, promoted economic development, and targeted revitalization and stabilization efforts in the AA, also identified CD needs.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives in the Combined Non-MSA AA. Examples include two investments in two different CDFIs and one LIHTC investment.

SERVICE TEST

AB demonstrated an outstanding record for the Combined Non-MSA AA regarding the Service Test. The leader level of CD services and the changes in branch locations that did not adversely affect accessibility outweighed the reasonably accessible delivery systems and services that do not vary in a way that inconveniences portions of the AA to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Combined Non-MSA AA. Reasonably accessible branch distribution and reasonably accessible alternative delivery systems support this conclusion. The following table shows that there are no low-income geographies in the AA. In moderate-income census tracts, the bank's branch distribution is comparable to the population percentage, reflecting reasonable accessibility. The Combined Non-MSA AA reflects a consistent conclusion to the overall institution's Accessibility of Delivery System performance.

Branch and ATM Distribution by Geography Income Level
Combined Non-MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	5.3	13,353	4.0	1	3.7	1	3.0
Middle	41	43.2	157,308	47.2	11	40.7	14	42.4
Upper	48	50.5	160,150	48.1	15	55.6	18	54.6
NA	1	1.1	2,306	0.7	0	0.0	0	0.0
Total	**95**	**100.0**	**333,117**	**100.0**	**27**	**100.0**	**33**	**100.0**

Source: 2020 U.S. Census Data; Bank Data; Due to rounding, totals may not equal 100.0 percent

In moderate-income census tracts, the bank's ATM distribution trails the population percentage by 1.0 percentage point, reflecting reasonable accessibility. Other alternative delivery systems offered in this AA remain consistent with those discussed at the institution level. Refer to the Service Test section at the institution level for specific details of retail banking services available through alternative delivery systems offered throughout all portions of the AA.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Since the previous evaluation, the bank closed the Copper Mountain Branch, located in a middle-income census tract in Summit County.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies and/or individuals. The Combined Non-MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution is a leader in providing CD services in the Combined Non-MSA AA. The leader level of CD services and good responsiveness supports this conclusion.

Bank employees provided 338 CD services in this AA since the previous evaluation. This level is an increase from the 305 CD services provided at the previous evaluation.

In addition to their extent, the CD services exhibit good responsiveness by addressing identified CD needs in all four CD purpose categories. Further, 65.4 percent of the bank's CD services benefited organizations that provide community services targeted to low- and moderate-income individuals, and to a lesser degree services that benefited organizations providing affordable housing, promoting economic development, and targeting revitalization and stabilization efforts. Such services represent CD needs in the Combined Non-MSA AA. The bank demonstrated leadership through Board or committee participation in a number of these activities.

The following lists examples of the bank's CD services in the Combined Non-MSA AA:

- ***Community Services*** – A bank employee served as a Board Treasurer for an organization that provides residential energy programs such as solar installations to low- and moderate-income residents. The organization serves between 26-33 families with income below 80 percent of the area median income.

- ***Affordable Housing*** – A bank employee serves as a Board member, on the Executive Committee, and on the Finance Committee for an organization that builds houses for low- and moderate-income families.

GRAND JUNCTION MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GRAND JUNCTION MSA AA

The Grand Junction MSA AA includes all 33 census tracts in Mesa County. AB operates five branches and eight ATMs in this AA. The Grand Junction MSA AA contains the third largest level of lending and second largest level of deposits among the bank's six AAs by accounting for 8.2 percent of loans and 13.0 percent of deposits and operating 12.8 percent of the branches.

Economic and Demographic Data

The Grand Junction MSA AA's 33 census tracts reflect the following income designations based on 2020 U.S. Census Data: 1 low-, 10 - moderate-, 14 middle-, and 8 upper-income census tracts. Although the geographic boundaries of the AA remain the same since the previous evaluation, the number of census tracts increased based on 2020 U.S. Census Data information. The county has also been designated as an EZ. The following table illustrates select demographic, housing, and business information for the Grand Junction MSA AA.

Demographic Information of the Assessment Area Grand Junction MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	33	3.0	30.3	42.4	24.2	0.0
Population by Geography	155,703	2.0	30.8	44.8	22.4	0.0
Housing Units by Geography	64,244	1.2	30.8	44.8	23.1	0.0
Owner-Occupied Units by Geography	41,270	0.2	25.3	46.6	28.0	0.0
Occupied Rental Units by Geography	18,480	3.3	45.0	39.7	12.1	0.0
Vacant Units by Geography	4,494	2.2	24.0	49.5	24.3	0.0
Businesses by Geography	26,161	2.1	22.4	49.2	26.3	0.0
Farms by Geography	814	0.4	6.0	63.0	30.6	0.0
Family Distribution by Income Level	37,528	19.4	18.8	22.3	39.5	0.0
Household Distribution by Income Level	59,750	24.1	16.1	17.9	41.8	0.0
Median Family Income MSA - 24300 Grand Junction, CO MSA		$72,740	Median Housing Value			$ 257,693
			Median Gross Rent			$994
			Families Below Poverty Level			8.5%
Source: 2020 U.S. Census Data; 2025 D&B Data; (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100 percent						

According to Moody's, Grand Junction's economy is slowing. The forces behind the downshift were broad-based. A burst of hiring at the beginning of 2025 by manufacturers quickly cooled down. The service sector sputtered as well. Relative to a year earlier, service providers expanded more than nationally, but payrolls have been flat recently. Consumer-dependent retail and leisure/hospitality struggled, while education/healthcare held its own. The unemployment rate inched down, though an unwelcome contraction in the labor force caused the decline. Single-family house price appreciation ran hotter than the state and U.S. paces. Residential permitting and construction remain steady.

Moody's also notes that the top employers in the Grand Junction MSA AA include Intermountain Health St. Mary's Regional Hospital, Community Hospital, Colorado Mesa University, and Grand Junction VA Medical Center. Based on the U.S. Bureau of Labor Statistics as of December 2025, the Grand Junction MSA AA unemployment rate of 3.7 percent was higher than the statewide rate of 3.6 percent but fell below the nationwide rate of 4.4 percent.

The following table shows the applicable FFIEC-estimated median family income levels used to analyze home mortgage loans under the borrower profile criterion and to qualify certain CD activities in the Grand Junction MSA AA.

Estimated Median Family Income Ranges Grand Junction MSA					
Year	**MFI**	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024	$ 86,400	< $43,200	$43,200 to < $69,120	$69,120 to < $103,680	≥ $103,680
Source: FFIEC					

Competition

The AA contains a low level of competition from other chartered banks based on the population, with each of the 35 offices from the 13 institutions serving on average approximately 4,449 people. According to the FDIC Deposit Market Share report as of June 30, 2025, AB ranked 1st with 20.4 percent deposit market share.

Community Contact

Examiners reviewed an existing community contact from a local economic development organization, to help assess the current economic conditions, community credit needs, and potential bank involvement in the AA. The contact stated that the population is split between retirees aged 65 and over and young professionals aged 25 to 44. The area's primary industries include healthcare, education, and manufacturing. Additionally, the contact stated that businesses in the area are primarily small and that these small businesses kept the economy's growth stable. The contact also stated that approximately 100 new single-family homes a year on average are built in the area, and the housing stock is plentiful. The contact identified the area's credit needs as home loans and business lending, specifically for start-up capital and loans to assist in expansion.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners concluded the primary credit needs in the Grand Junction MSA AA include home mortgage and small business loans. Furthermore, as indicated by the demographic and economic data, the AA's CD needs primarily include community services and affordable housing for low- and moderate-income individuals and families. Opportunities also exist for economic development to support opportunities in the designated EZ and for efforts that revitalize and stabilize low- and moderate-income geographies.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GRAND JUNCTION MSA AA

LENDING TEST

AB demonstrated a high satisfactory record in the Grand Junction MSA AA regarding the Lending Test. Excellent lending activity combined with a leader level in making CD loans hampered by adequate records regarding geographic distribution and borrower profile supports this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Grand Junction MSA AA when arriving at overall conclusions.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. An excellent record regarding home mortgage lending outweighed a good record regarding small business lending to support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the AAs' credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs. Excellent overall market ranking supports this conclusion. For 2024, the bank originated 160 reportable home mortgage loans totaling $40.4 million in the Grand Junction MSA AA. AB captured 3.1 percent of the market share by number and 2.8 percent of the market share by dollar volume of loans. This volume of activity ranks the bank 8th out of 264 total lenders, which lands in the top 3.0 percent of lenders reporting such loans in the Grand Junction MSA AA, considering the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs. Good overall market ranking supports this conclusion. For 2024, the bank originated 75 reportable small business loans totaling $11.3 million inside the Grand Junction MSA AA. AB captured 1.8 percent of the market share by number and 8.4 percent market share of the dollar volume of loans. This volume of activity ranks the bank 9th out of 75 total lenders in the Grand Junction MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 12.0 percent of lenders reporting such loans in the Grand Junction MSA AA.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Grand Junction MSA AA. Adequate performance regarding home mortgage and small business loans supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration in the Grand Junction MSA AA. Adequate performance in low and moderate-income geographies supports this conclusion. The following table shows that in low-income census tracts, the bank's level is comparable to aggregate data, reflecting adequate performance. In moderate-income census tracts, the bank's level of lending trails aggregate data by 9.3 percentage points, typically reflective of poor performance. However, in 2023 the bank's performance fell 6.8 percentage points below aggregate data, reflecting adequate performance. In 2025, the bank's performance improved and only lagged demographic data by 5.8 percentage points, also reflecting adequate performance. Considering the bank's performance over the entire evaluation period, the geographic distribution of home mortgage loans reflects adequate performance.

Geographic Distribution of Home Mortgage Loans Grand Junction MSA						
Tract Income Level	**% of Owner Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	0.2	0.3	0	0.0	0	0.0
Moderate	25.3	28.7	31	19.4	12,885	31.9
Middle	46.6	48.0	82	51.3	17,370	43.0
Upper	28.0	23.0	47	29.4	10,135	25.1
NA	0.0	0.0	0	0.0	0	0.0
Total	**100.0**	**100.0**	**160**	**100.0**	**40,390**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data; Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Grand Junction MSA AA. Adequate performance in low- and moderate-income geographies supports this conclusion. As seen in the following table, the bank's lending in low-income census tracts fell below aggregate data by 1.3 percentage points, reflecting adequate performance. In moderate-income census tracts, the bank's performance exceeds aggregate data by 7.6 percentage points, also reflecting adequate performance. In 2023, the bank's performance exceeded aggregate data by 1.7 percentage points, reflecting adequate performance. In 2025, the bank's performance surpassed demographic data by 8.6 percentage points, demonstrating good performance. Considering the bank's performance over the entire evaluation period, the geographic distribution of small business loans reflects adequate performance.

Geographic Distribution of Small Business Loans Grand Junction MSA						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	2.2	1.3	0	0.0	0	0.0
Moderate	21.6	23.1	23	30.7	4,275	37.7
Middle	49.4	51.5	43	57.3	6,291	55.5
Upper	26.9	24.1	9	12.0	775	6.8
NA	0.0	--	0	0.0	0	0.0
Total	**100.0**	**100.0**	**75**	**100.0**	**11,341**	**100.0**
Source: 2024 D&B Data; 2024 CRA Aggregate Data; 2024 CRA Reported Data; "--" data not available; Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Grand Junction MSA AA. Adequate records regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans based on borrowers' profiles reflects adequate penetration in the Grand Junction MSA AA. Adequate performance to low- and moderate-income borrowers supports this conclusion. As seen in the following table, the bank's lending to low-income borrowers falls 2.8 percentage points below aggregate data, reflecting adequate performance. The bank's lending to moderate-income borrowers trails aggregate data by 4.3 percentage points, also demonstrating adequate performance. In 2025, the bank's performance reflects an increasing trend by number and dollar volume to both low- and moderate-income borrowers. Considering the bank's performance during the entire evaluation period, the borrower profile of home mortgage loans reflects adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Grand Junction MSA						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low	19.4	5.9	5	3.1	295	0.7
Moderate	18.8	15.6	18	11.3	2,770	6.9
Middle	22.3	23.5	36	22.5	5,600	13.9
Upper	39.5	37.7	87	54.4	20,725	51.3
NA	0	17.3	14	8.8	11,000	27.2
Total	**100**	**100.0**	**160**	**100.0**	**40,390**	**100.0**
Source: 2020 Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data; Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The distribution of borrowers reflects adequate penetration among business customers of different sizes in the Grand Junction MSA AA. Adequate penetration to businesses with gross annual revenue of $1 million or less supports this conclusion. As shown in the following table, the bank's level of lending to small businesses with gross annual revenues of $1 million or less rises 10.1 percentage points above aggregate data, reflecting good performance. However, in 2023, the bank's lending level demonstrated adequate performance by exceeding aggregate data by 2.7 percentage points. In 2025, the bank's performance reflects a decreasing trend, by number, to businesses with gross annual revenues of $1 million or less. Additionally, the bank's performance in 2025 fell below demographic data by 33.5 percentage points, reflecting very poor performance. Considering the bank's performance over the entire evaluation period, the distribution of borrowers reflects adequate penetration.

Distribution of Small Business Loans by Gross Annual Revenue Category Grand Junction MSA						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000	91.6	56.6	50	66.7	3,901	34.4
> $1,000,000	2.0	--	25	33.3	7,440	65.6
Revenue Not Available	6.5	--	0	0.0	0	0.0
Total	**100.0**	**100.0**	**75**	**100.0**	**11,341**	**100.0**
Source: 2024 D&B Data; 2024 CRA Aggregate Data; 2024 CRA Reported Data; "--" data not available						

Community Development Loans

The institution is a leader in making CD loans in the Grand Junction MSA AA. The bank granted 13 CD loans totaling $25.4 million in this area. By dollar volume, this equates to 9.0 percent of the bank's overall excellent level of CD loans as compared to the 8.2 percent of the bank's HMDA and CRA reportable loans attributed to this area. Additionally, the number and dollar volume of CD lending in this AA increased since the previous evaluation where the bank granted 11 CD loans totaling $12.3 million. Besides their extent, the CD loans reflect excellent responsiveness to the AA's CD needs given that the bank originated loans in all four CD categories, primarily focusing on revitalization and stabilization efforts.

The following point highlights examples of the bank's CD lending in the Grand Junction MSA AA:

- ***Revitalize and Stabilize* –** The bank originated one loan totaling $3.6 million to purchase a shopping center located in a moderate-income census tract in the Mesa County EZ. The tenants provide various medical services. The loan proceeds aid in attracting and retaining new and existing businesses and residents in the area.

- ***Economic Development* –** The bank originated one loan totaling $1.5 million to finalize construction of an office building that houses six non-profit organizations as well as a day-care facility in Grand Junction, Colorado. The project is an approved Mesa County EZ project.

INVESTMENT TEST

AB demonstrated an outstanding record in the Grand Junction MSA AA regarding the Investment Test. The excellent level of qualified CD investments and grants and good responsiveness outweighed the rare use of innovative and/or complex investments to support this conclusion.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the Grand Junction MSA AA. The bank made 166 qualified investments totaling $20.5 million in the Grand Junction MSA AA. By dollar volume, this equates to 9.3 percent of the bank's overall excellent level of qualified investments as compared to 13.0 percent of total deposits attributed to this AA. These excellent levels represent an increase from the 128 qualified investments totaling $9.4 million recorded at the previous evaluation.

The following provides examples of qualified investments in the Grand Junction MSA AA:

- ***Affordable Housing*** – The bank invested $3.0 million in new mortgage-backed securities in the Grand Junction MSA with underlying loans to finance single-family housing for low- and moderate-income individuals.

- ***Community Services*** **–** The bank donated $74.8 thousand to an organization that supports the Grand Junction, Colorado public schools by providing private support for key education initiatives. A majority of the schools in the district enroll a majority of students that qualify for free or reduced lunch, thereby providing community services to low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

The institution exhibits good responsiveness to credit and CD needs in the Grand Junction MSA AA. The bank demonstrated good responsiveness to CD needs by the dollar amount in all four CD purpose categories, with an emphasis on promoting revitalization and stabilization efforts.

Community Development Initiatives

The institution rarely uses innovative and/or complex investments to support CD initiatives in the Grand Junction MSA AA. Since the prior evaluation, the bank primarily invested in school bonds and mortgage loan pools, which are typically not innovative or complex.

SERVICE TEST

AB demonstrated an outstanding record for the Grand Junction MSA AA regarding the Service Test. The leader level of CD services outweighed the accessible delivery systems and services that do not vary in a way that inconveniences portions of the AA to support this conclusion. The bank did not open or close any branches in this AA during the evaluation period.

Accessibility of Delivery Systems

Delivery systems prove accessible to essentially all portions of the Grand Junction MSA AA. Accessible branch distribution slightly hampered by reasonably accessible alternative delivery systems support this conclusion. The bank did not operate any offices in the single low-income census tract. However, the following table shows the branch distribution in low-income census tracts falls 2.0 percentage points below the population in this tract, reflecting reasonable accessibility. The bank's distribution of branches in moderate-income census tracts exceeds the population percentage by 9.2 percentage points, reflecting accessibility. Examiners placed more weight on the bank's performance in moderate-income census tracts given the greater population within moderate-income geographies. The Grand Junction MSA AA reflects an inconsistent conclusion and exceeds the overall institution's Accessibility of Delivery System performance.

Branch and ATM Distribution by Geography Income Level Grand Junction MSA								
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	1	3.0	3,115	2.0	0	0.0	0	0.0
Moderate	10	30.3	48,005	30.8	2	40.0	3	37.5
Middle	14	42.4	69,726	44.8	3	60.0	4	50.0
Upper	8	24.2	34,857	22.4	0	0.0	1	12.5
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	**33**	**100.0**	**155,703**	**100.0**	**5**	**100.0**	**8**	**100.0**
Source: 2020 U.S. Census Data; Bank Data								

The bank does not operate any ATMs in the one low-income census tract. The ATM distribution trails the population percentage by 2.0 percentage points, reflecting reasonable accessibility. In moderate-income census tracts, the bank's ATM distribution exceeds the population percentage by 6.7 percentage points, also reflecting reasonable accessibility. Other alternative delivery systems offered in this AA remain consistent with those discussed at the institution level. Refer to the Service Test section at the institution level for specific details of retail banking services available through alternative delivery systems offered throughout all portions of the AA.

Changes in Branch Locations

During the evaluation period, AB did not open or close any branches in the Grand Junction MSA AA. Therefore, this criterion did not affect the overall Service Test rating for this area.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies and/or individuals. The Grand Junction MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution is a leader in providing CD services in the Grand Junction MSA AA. The leader level of CD services and good responsiveness supports this conclusion.

Bank employees provided 142 CD services in this AA since the previous evaluation. This level is an increase from the 105 CD services provided at the previous evaluation.

In addition to their extent, the CD services exhibit good responsiveness by addressing identified CD needs in three of the four CD purpose categories. Further, 73.9 percent of the bank's CD services benefited organizations that provide community services targeted to low- and moderate-income individuals, as well as to organizations providing affordable housing and promoting economic development. Such services represent CD needs in the Grand Junction MSA AA. The bank demonstrated leadership through Board or committee participation in a number of these activities.

The following lists examples of the bank's CD services in the Grand Junction MSA:

- ***Community Services*** – A bank employee served as a Board member for an organization that awards scholarships to low- and moderate-income students.

- ***Community Services*** – A bank employee conducted fraud training to an organization that provides community services to homeless veterans and seniors.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE REVIEW ASSESSMENT AREAS

The following table summarizes the conclusions for AAs reviewed using limited-scope examination procedures. The table identifies whether conclusions regarding applicable tests for the limited-scope review either exceeds, are consistent with, or fall below the performance for the bank as a whole. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, economic data, competition, community contact, and demographic information. The conclusions from the limited-scope area did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Denver-Aurora-Centennial MSA	Consistent	Consistent	Consistent
Boulder MSA	Below	Consistent	Consistent
Colorado Springs MSA	Consistent	Consistent	Consistent
Fort Collins MSA	Consistent	Consistent	Consistent

Facts and data supporting conclusions for the limited-scope AAs follow, including a summary of AB's operations and activities. The demographic data for the limited-scope AAs is in the appendices.

Denver-Aurora-Centennial MSA AA

The Denver-Aurora-Centennial MSA AA consists of all census tracts in Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson counties. AB operates four full-service branches and four ATMs in this AA. The bank opened the Aurora Branch, located in a low-income census tract, during the review period. The distribution of branches and alternative delivery systems demonstrated consistent performance with the institution's overall conclusion. Service hours, as well as loan and deposit products, do not inconvenience portions of the AA. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000)
Home Mortgage Loans	102	36,620
Small Business Loans	104	26,016
CD Loans	17	48,848
Investments	222	71,677
CD Services	202	-
Source: Bank Data		

Boulder MSA AA

The bank's Boulder MSA AA consists of all census tracts in Boulder County. AB operates one full-service branch and one ATM in the AA. No branches opened or closed during the review period. The distribution of branches and alternative delivery systems demonstrated consistent performance with the institution's overall conclusion. Service hours, as well as loan and deposit products, do not inconvenience portions of the AA. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000)
Home Mortgage Loans	25	12,805
Small Business Loans	17	2,721
CD Loans	2	3,892
Investments	32	4,139
CD Services	36	-
Source: Bank Data		

Colorado Springs MSA AA

The Colorado Springs MSA AA consists of all census tracts in El Paso County. AB operates one full-service branch and one ATM in this AA, both located in a moderate-income census tract. No branches opened or closed during the review period. The distribution of branches and alternative delivery systems exceeds the overall institution level. Service hours, as well as loan and deposit products, do not inconvenience portions of the AA. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000)
Home Mortgage Loans	14	8,480
Small Business Loans	12	1,934
CD Loans	7	25,830
Investments	55	5,700
CD Services	38	-
Source: Bank Data		

Fort Collins MSA AA

The Fort Collins MSA AA consists of all census tracts in Larimer County. AB operates one full-service branch and two ATMs in this AA. No branches opened or closed during the review period. The distribution of branches and alternative delivery systems demonstrated consistent performance with the institution's overall conclusion. Service hours, as well as loan and deposit products, do not inconvenience portions of the AA. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000)
Home Mortgage Loans	19	3,135
Small Business Loans	16	2,436
CD Loans	2	9,025
Investments	33	8,357
CD Services	17	-
Source: Bank Data		

Geographic Distribution

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% 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
Denver-Aurora-Centennial MSA	102	36,620	63.8	82,439	2.9	2.0	2.7	21.2	17.7	21.2	36.8	33.3	35.9	38.6	46.1	39.7	0.5	1.0	0.5
Boulder MSA	25	12,805	15.6	6,983	1.7	16.0	1.5	14.2	12.0	13.7	44.2	32.0	50.1	38.6	40.0	33.5	1.3	0.0	1.3
Colorado Springs MSA	14	8,480	8.8	23,893	1.3	0.0	1.5	19.7	42.9	18.1	41.9	14.3	39.6	37.0	42.9	40.6	0.3	0.0	0.2
Fort Collins MSA	19	3,135	11.9	10,406	0.4	0.0	0.4	14.8	10.5	14.0	64.3	63.2	61.9	20.5	26.3	23.7	0.1	0.0	0.0
Total	**160**	**61,040**	**100.0**	**123,721**	**2.3**	**3.8**	**2.2**	**19.8**	**18.1**	**19.6**	**40.6**	**35.0**	**39.6**	**36.8**	**42.5**	**38.2**	**0.5**	**0.6**	**0.4**
Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data; Due to rounding, totals may not equal 100.0 percent																			

Assessment Area Distribution of Small Business Loans by Income Category of the Geography																			2024
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boulder MSA	17	2,721	11.4	13,768	1.4	0.0	1.9	35.2	11.8	20.1	29.1	52.9	38.9	32.2	23.5	37.4	2.2	11.8	1.7
Colorado Springs MSA	12	1,934	8.1	18,461	1.4	0.0	1.1	31.9	66.7	23.4	36.1	8.3	33.9	30.3	25.0	41.2	0.4	0.0	0.5
Denver-Aurora-Centennial MSA	104	26,016	69.8	101,328	4.2	6.7	4.2	23.1	26.9	21.1	33.0	23.1	32.0	37.3	31.7	40.3	2.4	11.5	2.4
Fort Collins MSA	16	2,436	10.7	11,116	0.5	6.3	0.4	17.7	6.3	14.6	65.6	81.3	63.1	16.3	6.3	21.8	0.0	0.0	0.0
Total	**149**	**33,107**	**100.0**	**144,673**	**3.2**	**5.4**	**3.3**	**25.2**	**26.2**	**20.8**	**35.5**	**31.5**	**35.3**	**34.2**	**27.5**	**38.7**	**1.9**	**9.4**	**1.9**
Source: 2024 D&B Data; 2024 CRA Aggregate Data; 2024 CRA Reported Data; Due to rounding, totals may not equal 100.0 percent																			

Borrower Profile

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

	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
Denver-Aurora-Centennial MSA	102	36,620	63.8	82,439	20.2	5.9	6.8	18.2	13.7	17.4	21.9	11.8	23.4	39.7	58.8	35.0	0.0	9.8	17.4
Boulder MSA	25	12,805	15.6	6,983	20.5	4.0	8.6	17.8	0.0	14.4	21.3	20.0	21.2	40.5	56.0	41.2	0.0	20.0	14.5
Colorado Springs MSA	14	8,480	8.8	23,893	18.9	0.0	4.6	18.6	7.1	13.9	21.9	14.3	22.9	40.6	50.0	37.0	0.0	28.6	21.6
Fort Collins MSA	19	3,135	11.9	10,406	19.2	31.6	5.5	18.3	0.0	15.7	23.6	5.3	22.0	38.9	57.9	38.8	0.0	5.3	17.9
Total	**160**	**61,040**	**100.0**	**123,721**	**19.9**	**8.1**	**6.4**	**18.3**	**9.4**	**16.4**	**22.0**	**12.5**	**23.1**	**39.9**	**57.5**	**36.1**	**0.0**	**12.5**	**18.1**

Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data; Due to rounding, totals may not equal 100.0 percent

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2024**

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Denver-Aurora-Centennial MSA	104	26,016	69.8	101,328	93.2	47.1	55.4	1.7	52.9	5.2	0.0
Boulder MSA	17	2,721	11.4	13,768	94.1	35.3	57.3	1.4	64.7	4.5	0.0
Colorado Springs MSA	12	1,934	8.1	18,461	93.1	33.3	58.4	1.5	66.7	5.5	0.0
Fort Collins MSA	16	2,436	10.7	11,116	92.5	68.8	57.7	1.5	31.3	6.0	0.0
Total	**149**	**33,107**	**100.0**	**144,673**	**93.2**	**47.0**	**56.1**	**1.6**	**53.0**	**5.2**	**0.0**

Source: 2024 D&B Data; 2024 CRA Aggregate Data; 2024 CRA Reported Data; Due to rounding, totals may not equal 100.0 percent

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
    i. The proportion of the bank's lending in the bank's assessment area(s);
    ii. The dispersion of lending in the bank's assessment areas(s); and
    iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
    i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
    ii. Small business and small farm loans to businesses and farms with gross annual revenues of $1 million or less;
    iii. Small business and small farm loans by loan amount at origination; and
    iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

1) The dollar amount of qualified investments;
2) The innovativeness or complexity of qualified investments;
3) The responsiveness of qualified investments to available opportunities; and
4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.,* RSFs, RSFs 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) in low- and moderate-income geographies and to low- and moderate-income individuals; and
4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

1) The extent to which the bank provides community development services; and
2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

Alpine Bank	
Scope of Examination: Examiners performed full scope reviews on the following AAs: Combined Non-MSA AA Grand Junction MSA AA Examiners performed limited-scope reviews on the following AAs: Denver-Aurora-Centennial MSA AA Boulder MSA AA Colorado Springs MSA AA Fort Collins MSA AA	
Time Period Reviewed:	08/07/2023 – 04/27/2026
Products Reviewed: Home Mortgage Loans (01/01/2023 – 12/31/2025) Small Business Loans (01/01/2023 – 12/31/2025)	

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

Denver-Aurora-Centennial MSA AA

The Denver-Aurora-Centennial MSA AA is comprised of all census tracts in Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson counties. Based on 2020 U.S. Census data, the AA includes 37 low-, 173 moderate-, 246 middle-, 213 upper-income census tracts, and 19 tracts with no income designation. Although the geographic boundaries of the AA remain the same since the prior evaluation, the number of census tracts increased based on 2020 U.S. Census information. The AA was part of a major disaster declaration by FEMA during the review period. The following table includes certain demographic data for this AA according to 2020 U.S. Census data.

Demographic Information of the Assessment Area Denver-Aurora-Centennial MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	688	5.4	25.2	35.8	31.0	2.8
Population by Geography	2,905,164	5.2	26.9	34.0	33.0	0.9
Housing Units by Geography	1,124,255	5.2	26.8	35.4	31.5	1.2
Owner-Occupied Units by Geography	690,922	2.9	21.2	36.8	38.6	0.5
Occupied Rental Units by Geography	383,711	9.1	36.5	33.5	18.7	2.3
Vacant Units by Geography	49,622	5.8	29.8	31.8	30.5	2.1
Businesses by Geography	591,527	4.1	22.5	32.3	38.6	2.5
Farms by Geography	5,552	2.6	15.7	36.3	43.3	2.1
Family Distribution by Income Level	670,748	20.2	18.2	21.9	39.7	0.0
Household Distribution by Income Level	1,074,633	22.6	17.1	19.0	41.4	0.0
Median Family Income MSA - 19740 Denver-Aurora-Centennial, CO MSA		$103,157	Median Housing Value			$ 429,354
			Median Gross Rent			$1,457
			Families Below Poverty Level			5.4%
Source: 2020 U.S. Census Data; 2025 D&B Data; (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent						

According to the FDIC Deposit Market Share report as of June 30, 2025, 66 financial institutions operated 582 offices within this AA. Of these institutions, AB ranked 23rd with a 0.4 percent deposit market share.

Based on 2024 HMDA data, the bank originated 102 reportable home mortgage loans totaling $36.6 million in the Denver-Aurora-Centennial MSA AA. AB captured 0.1 percent market share of the total number of home mortgage loans and a 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 130th out of 737 total lenders in the Denver-Aurora-Centennial MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 17.6 percent of lenders reporting such loans in the Denver-Aurora-Centennial MSA AA.

Based on 2024 CRA data, the bank originated 104 reportable small business loans totaling $26.0 million. AB captured a 0.1 percent market share of the total number of small business loans and a 0.9 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 50th out of 220 total lenders in the Denver-Aurora-Centennial MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 22.7 percent of lenders reporting such loans in the Denver-Aurora-Centennial MSA AA.

Boulder MSA AA

The Boulder MSA AA is comprised of all census tracts in Boulder County. Based on 2020 U.S. Census data, the AA includes 4 low-, 13 moderate-, 32 middle-, 26 upper-income census tracts, and 3 tracts with no income designation. Although the geographic boundaries of the AA remain the same since the prior evaluation, the number of census tracts increased based on 2020 U.S. Census information. The following table includes certain demographic data for this AA according to 2020 U.S. Census data.

Demographic Information of the Assessment Area Boulder MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	78	5.1	16.7	41.0	33.3	3.9
Population by Geography	330,758	4.6	16.0	43.2	33.4	2.8
Housing Units by Geography	135,409	3.2	16.6	44.8	31.6	3.9
Owner-Occupied Units by Geography	81,061	1.7	14.2	44.2	38.6	1.3
Occupied Rental Units by Geography	46,304	5.8	21.2	44.3	21.0	7.6
Vacant Units by Geography	8,044	3.3	13.4	52.9	21.2	9.2
Businesses by Geography	96,627	1.4	35.9	29.0	31.3	2.4
Farms by Geography	1,348	0.9	27.7	38.3	31.5	1.6
Family Distribution by Income Level	73,244	20.5	17.8	21.3	40.5	0.0
Household Distribution by Income Level	127,365	25.9	15.1	16.9	42.2	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		$118,307	Median Housing Value			$ 593,196
			Median Gross Rent			$1,610
			Families Below Poverty Level			4.2%
Source: 2020 U.S. Census Data; 2025 D&B Data; (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent						

According to the FDIC Deposit Market Share report as of June 30, 2025, 33 financial institutions operated 90 offices within this AA. Of these institutions, AB ranked 22nd with a 0.6 percent deposit market share.

Based on 2024 HMDA data, the bank originated 25 reportable home mortgage loans totaling $12.8 million. AB captured 0.4 percent market share of the total number of home mortgage loans and a 0.3 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 59th out of 354 total lenders in the Boulder MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 16.7 percent of lenders reporting such loans in the Boulder MSA AA.

Based on 2024 CRA data, the bank originated 17 reportable small business loans totaling $2.7 million. AB captured a 0.1 percent market share of the total number of small business loans and a 0.7 percent market share of the total dollar volume of loans. This volume of activity ranks 39th out of 106 total lenders in the Boulder MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 36.8 percent of lenders reporting such loans in the Boulder MSA AA.

Colorado Springs MSA AA

The Colorado Springs MSA AA is comprised of all census tracts in El Paso County. Based on 2020 U.S. Census data, the AA includes 4 low-, 46 moderate-, 66 middle-, 49 upper-income census tracts, and two tracts with no income designation. The AA was part of a major disaster declaration by FEMA during the review period. The following table includes certain demographic data for this AA according to 2020 U.S. Census data.

Demographic Information of the Assessment Area Colorado Springs MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	167	2.4	27.5	39.5	29.3	1.2
Population by Geography	730,395	1.9	25.2	39.1	33.2	0.7
Housing Units by Geography	276,538	2.1	27.6	40.2	29.8	0.4
Owner-Occupied Units by Geography	171,408	1.3	19.7	41.9	37.0	0.3
Occupied Rental Units by Geography	91,372	3.7	41.7	37.9	16.2	0.5
Vacant Units by Geography	13,758	1.8	32.6	34.0	31.3	0.4
Businesses by Geography	116,587	1.4	30.7	37.1	30.5	0.4
Farms by Geography	1,379	0.4	22.8	43.4	33.1	0.3
Family Distribution by Income Level	178,757	18.9	18.6	21.9	40.6	0.0
Household Distribution by Income Level	262,780	22.7	16.5	19.3	41.5	0.0
Median Family Income MSA - 17820 Colorado Springs, CO MSA		$83,751	Median Housing Value			$ 301,087
			Median Gross Rent			$1,242
			Families Below Poverty Level			6.6%
Source: 2020 U.S. Census Data; 2025 D&B Data; (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent						

According to the FDIC Deposit Market Share report as of June 30, 2025, 40 financial institutions operated 126 offices within this AA. Of these institutions, AB ranked 37th with a 0.2 percent deposit market share.

Based on 2024 HMDA data, the bank originated 14 reportable home mortgage loans totaling $8.5 million. AB captured 0.1 percent market share of the total number of home mortgage loans and a 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 142nd out of 486 total lenders in the Colorado Springs MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 29.2 percent of lenders reporting such loans in the Colorado Springs MSA AA.

Based on 2024 CRA data, the bank originated 12 reportable small business loans totaling $1.9 million. AB captured a 0.1 percent market share of the total number of small business loans and a 0.5 percent market share of the total dollar volume of loans. This volume of activity ranks 52nd out of 125 total lenders in the Colorado Springs MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 41.6 percent of lenders reporting such loans in the Colorado Springs MSA AA.

Fort Collins MSA AA

The Fort Collins MSA AA is comprised of all census tracts in Larimer County. Based on 2020 U.S. Census data, the AA includes 1 low-, 16 moderate-, 52 middle-, 16 upper-income census tracts, and one tract with no income designation. The following table includes certain demographic data for this AA according to 2020 U.S. Census data.

Demographic Information of the Assessment Area Fort Collins MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	86	1.2	18.6	60.5	18.6	1.2
Population by Geography	359,066	1.7	18.3	61.4	18.7	0.0
Housing Units by Geography	144,583	1.7	17.5	65.4	15.4	0.1
Owner-Occupied Units by Geography	88,959	0.4	14.8	64.3	20.5	0.1
Occupied Rental Units by Geography	45,226	4.5	23.4	65.2	6.9	0.0
Vacant Units by Geography	10,398	0.8	15.2	75.4	8.4	0.3
Businesses by Geography	62,598	0.5	17.6	65.5	16.5	0.0
Farms by Geography	1,219	0.3	11.8	65.4	22.3	0.2
Family Distribution by Income Level	83,921	19.2	18.3	23.6	38.9	0.0
Household Distribution by Income Level	134,185	24.2	16.0	18.8	41.0	0.0
Median Family Income MSA - 22660 Fort Collins-Loveland, CO MSA		$96,221	Median Housing Value			$ 394,717
			Median Gross Rent			$1,335
			Families Below Poverty Level			4.7%
Source: 2020 U.S. Census Data; 2025 D&B Data; (*) The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0 percent						

According to the FDIC Deposit Market Share report as of June 30, 2025, 26 financial institutions operated 88 offices within this AA. Of these institutions, AB ranked 24th with a 0.2 percent deposit market share.

Based on 2024 HMDA data, the bank originated 19 reportable home mortgage loans totaling $3.1 million. AB captured 0.2 percent market share of the total number of home mortgage loans and a 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks 88th out of 402 total lenders in the Fort Collins MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 21.9 percent of lenders reporting such loans in the Fort Collins MSA AA.

Based on 2024 CRA data, the bank originated 16 reportable small business loans totaling $2.4 million. AB captured a 0.1 percent market share of the total number of small business loans and a 0.6 percent market share of the total dollar volume of loans. This volume of activity ranks 41st out of 107 total lenders in the Fort Collins MSA AA. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 38.3 percent of lenders reporting such loans in the Fort Collins MSA AA.

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

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

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

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

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

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

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

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

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

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

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.
Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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