

PUBLIC DISCLOSURE

May 12, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ireland Bank
Certificate Number: 1237

33 Bannock Street
Malad City, Idaho 83252

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

25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

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 **Satisfactory**.

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

- The loan-to-deposit (LTD) ratio is reasonable, considering seasonal variations and lending-related activities, given the institution's size, financial condition, and assessment area (AA) credit needs.
- A majority of loans and other lending related activities are in the institution's AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects, given the demographics of the AAs, excellent penetration among businesses and farms of different sizes.
- The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the overall rating.

DESCRIPTION OF INSTITUTION

Ireland Bank (IB) is an Idaho state-chartered commercial bank headquartered in Malad City, Idaho. The bank has no affiliates or subsidiaries and is wholly owned by Ireland Bancorp, Ltd. IB received a “Satisfactory” rating at the previous Federal Deposit Insurance Corporation (FDIC) Performance Evaluation, dated June 13, 2022, based on Interagency Small Institution Examination Procedures. IB did not participate in any merger or acquisition activity since the previous examination. Two branches were closed over the review period in the Pocatello AA.

IB offers a full range of traditional consumer and business banking products and services through 12 branch offices throughout southeastern Idaho. The bank continues to be primarily a commercial and agricultural lender, though there has been an increasing focus on consumer loans since the prior examination. Automated teller machines (ATM) and drive-through banking are available at most locations, and IB also offers online, mobile, and telephone banking services.

The bank’s assets total \$365.5 million as of March 31, 2025, which included total deposits of \$320.4 million and \$191.6 million in total loans. As demonstrated in the table below, the loan portfolio is primarily comprised of commercial and industrial loans, consumer loans, farmland and agricultural production loans.

Loan Portfolio Distribution as of March 31, 2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	12,873	6.7
Secured by Farmland	23,974	12.5
Secured by 1-4 Family Residential Properties	7,682	4.0
Secured by Multi-family (5 or more) Residential Properties	12,219	6.4
Secured by Non-farm Non-Residential Properties	36,485	19.1
Total Real Estate Loans	93,233	48.7
Commercial and Industrial Loans	38,721	20.2
Agricultural Production and Other Loans to Farmers	23,446	12.2
Consumer	35,094	18.3
Obligations of States and Political Subdivisions in the United States	-	-
Other Loans	-	-
Lease Financing Receivables (net of unearned income)	1,069	0.6
Less: Unearned Income	-	-
Total Loans	191,563	100.0
<i>Source: 3/31/2025 Consolidated Report of Condition and Income</i>		

There are no legal or financial impediments that would prohibit the bank from meeting the credit needs of its AAs.

DESCRIPTION OF ASSESSMENT AREAS

IB has designated four AAs. The AAs have changed from the prior evaluation as Cassia County has been removed from the institution's Idaho Non-MSA AA, Power County has moved from the Pocatello AA to the Idaho Non-MSA AA, and Jerome County was added to the Twin Falls AA. The designated AAs comply with the technical requirements of the CRA regulation and do not arbitrarily exclude any low- and moderate-income (LMI) individuals or geographies.

Description of Assessment Areas		
Assessment Area	Counties	Census Tracts
Pocatello	Bannock County	24
Twin Falls	Twin Falls and Jerome Counties	23
Logan UT-ID	Franklin County	2
Idaho Non-MSA	Bear Lake, Bingham (partial), Blaine, Caribou, Custer, Oneida, and Power Counties	19
<i>Source: Bank Records</i>		

Please refer to the individual AAs for full detail.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated June 13, 2022, to the current evaluation date of May 12, 2025. Examiners used the Interagency Small Institution Examination Procedures to evaluate IB's CRA performance.

The Lending Test considers the institution's performance according to the following criteria:

- LTD ratio;
- AA concentration;
- Geographic distribution;
- Borrower profile; and
- Response to CRA-related complaints.

Examiners relied on records and reports provided by bank management, publicly available financial information, demographic data, and information gathered as part of the evaluation process. Examiners performed onsite review activities at the bank's headquarters in Malad City, Idaho.

The Idaho Non-MSA AA contains the majority of the bank's loans, deposits, and branch locations. As such, the Idaho Non-MSA AA received full-scope review and contributed the greatest weight to overall conclusions. Based on the same factors, examiners also used full-scope evaluation procedures for the Pocatello AA contributing moderate weight. The Logan and Twin Falls AAs contribute minimal weight to CRA conclusions and were evaluated using limited-scope procedures.

Activities Reviewed

Based on the bank's business strategy, loan composition, and the number and dollar amount of loans originated during the review period, small business and small farm loans represent IB's primary product lines. Examiners did not evaluate home mortgage loans and consumer loans, as these loans do not represent major product lines and did not provide material weight for the ratings.

IB is not required to collect or report small business and small farm loans pursuant to CRA. Examiners analyzed the universe of small business and small farm loans originated or purchased from January 1, 2023, to December 31, 2024, as collected within the bank's records. IB originated or purchased 146 small business loans totaling \$22.7 million in 2023, and 164 small business loans totaling \$29.2 million in 2024. IB also originated or purchased 146 small farm loans totaling \$13.7 million in 2023, and 116 small farm loans totaling \$9.7 million in 2024. Given that small business lending represents a greater portion of the bank's loan portfolio than small farm lending, small business lending contributes more weight to the overall conclusions.

Small business and small farm lending performance is compared to D&B small business and farm demographic data. While lending by both number and dollar is analyzed, performance by number of loans carries greater weight to overall conclusions, as it is a better measure of the actual number of businesses and farms served.

D&B data provides a general outline of the potential for lending within an AA; this information

includes very small businesses that may not be credit-worthy or credit-seeking. Therefore, demographic data does not always reflect the actual lending demand of an area. Aggregate data is also referenced in the evaluation as an indicator for loan demand but not used as a direct comparison since the bank is not required to report CRA data.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

IB's Lending Test performance is rated Satisfactory.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given IB's size, financial condition, and AA credit needs. The LTD ratio averaged 63.3 percent over the past 12 calendar quarters from June 30, 2022, to March 31, 2025. The ratio fluctuated during the review period, ranging from a high of 69.2 percent to a low of 58.2 percent but remained comparable to similarly situated institutions. Similarly situated institutions were selected based on asset size, product mix, and market area.

Loan-to-Deposit Ratio Comparison		
Banks	Total Assets as of 3/31/2025 (\$000s)	Average Net LTD Ratio (%)
Ireland Bank	365,539	63.3
Similarly-Situated Institution #1	624,448	60.8
Similarly-Situated Institution #2	2,220,785	74.0
<i>Source: Reports of Condition and Income 6/30/2022 - 3/31/2025</i>		

Assessment Area Concentration

The bank made a majority of its small business and small farm loans within its AAs by both number and dollar volume. The following table shows the bank's performance by product and year.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2023	115	78.8	31	21.2	146	15,564	68.4	7,193	31.6	22,757
2024	126	76.8	38	23.2	164	20,847	71.4	8,361	28.6	29,208
Subtotal	241	77.7	69	22.3	310	36,411	70.1	15,554	29.9	51,965
Small Farm										
2023	115	78.8	31	21.2	146	8,340	60.8	5,377	39.2	13,717
2024	93	80.2	23	19.8	116	7,130	73.8	2,533	26.2	9,663
Subtotal	208	79.4	54	20.6	262	15,470	66.2	7,910	33.8	23,380
Total	449	78.5	123	21.5	572	51,881	68.9	23,464	31.1	75,345
Source: Bank Data Due to rounding, totals may not equal 100.0% Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. The Idaho Non-MSA and Logan UT-ID AAs do not include any LMI geographies, and a review of the geographic distribution criterion for these areas would not result in meaningful conclusions. Therefore, this criterion was only evaluated for the Pocatello and Twin Falls AAs. Performance was generally consistent throughout the analyzed AAs.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, excellent penetration among businesses and farms of different sizes. Performance in the Idaho Non-MSA AA exceeded performance in all other AAs and contributed the greatest weight to this conclusion.

Response to Complaints

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

IDAHO NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN IDAHO NON-MSA

The Idaho Non-MSA AA is generally located in southcentral and southeastern Idaho, along the border with Utah. The AA consists of Bear Lake, Blaine, Caribou, Custer, Oneida, and Power Counties and the northwestern portion of Bingham County. Power County is a new addition to this AA, and Cassia County has been removed since the prior examination.

Economic and Demographic Data

The AA consists of 12 middle- and 7 upper-income census tracts (CTs). The following table details key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: ID Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	0.0	63.2	36.8	0.0
Population by Geography	70,697	0.0	0.0	68.2	31.8	0.0
Housing Units by Geography	37,072	0.0	0.0	62.7	37.3	0.0
Owner-Occupied Units by Geography	19,093	0.0	0.0	67.5	32.5	0.0
Occupied Rental Units by Geography	5,819	0.0	0.0	76.1	23.9	0.0
Vacant Units by Geography	12,160	0.0	0.0	48.7	51.3	0.0
Businesses by Geography	11,121	0.0	0.0	55.8	44.2	0.0
Farms by Geography	1,061	0.0	0.0	75.9	24.1	0.0
Family Distribution by Income Level	17,272	15.0	18.2	23.1	43.7	0.0
Household Distribution by Income Level	24,912	18.9	13.7	19.6	47.8	0.0
Median Family Income Non-MSAs - ID		\$62,251	Median Housing Value			\$301,138
			Median Gross Rent			\$789
			Families Below Poverty Level			8.7%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

As demonstrated by the table on the following page, unemployment in the counties that represent the AA generally outperforms national averages and is consistent with state averages. Only unemployment in Custer County, which contains a CT designated as underserved, exceeds national rates.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Bear Lake County	2.7	2.6	2.9
Bingham County	3.0	3.3	3.5
Blaine County	2.7	2.9	3.1
Caribou County	3.6	3.6	3.4
Custer County	4.5	4.7	5.2
Oneida County	2.8	3.1	2.8
Power County	3.0	3.5	3.3
Idaho State	2.9	3.2	3.7
National Average	3.6	3.6	4.0
<i>Source: Bureau of Labor Statistics</i>			

The Idaho Non-MSA AA is rural and comprised mainly of farmland and national forests. The main non-farm industries in the area are governmental and healthcare services.

Competition

According to the June 30, 2024, FDIC Deposit Market Share report, IB ranked 7th out of 12 institutions operating in the AA, with a market share of 8.8 percent. The institution operates 7 out of the total 38 branches operated by all financial institutions in the market.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners contacted representatives of two different agricultural organizations in the AA. Both contacts identified land loans as a primary credit need in the area, though one contact noted that because of high land prices, the demand for these loans is not very high. One contact identified a need in Oneida County for operating lines of credit for new farmers or ranchers with limited credit histories. The contact noted that new farmers may have significant cash flow throughout the year and may be able to write a large check but may be unable to secure a relatively small operating line of credit because they do not have a long credit history.

Credit Needs

Considering area demographics, economic data, conversations with bank management and community contacts, examiners identified small farm loans are the primary credit need of the AA. In particular, more lines of credit to startup farmers and ranchers are needed in the community.

CONCLUSIONS ON PERFORMANCE CRITERIA IN IDAHO NON-MSA AA

LENDING TEST

IB's Lending Test performance in Idaho Non-MSA AA is reasonable.

Geographic Distribution

The AA does not include any LMI geographies, and a review of the geographic distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.

Borrower Profile

The distribution of borrowers in the AA reflects, given the demographics of the AA, excellent penetration among business and farm customers of different sizes.

Small Business Loans

The bank's penetration of lending to small businesses is below demographics; however, as discussed, demographic data provides only a measure of potential opportunity in an area. Examiners reviewed aggregate data to determine the demand level for small business loans. Aggregate data indicates actual demand is much lower, with reporting institutions able to achieve only 51.8 percent penetration to this area in 2023. Given this context, IB's performance is excellent.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: ID Non-MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2023	90.4	41	66.1	2,476	37.4
2024	90.1	45	70.3	3,216	45.1
>\$1,000,000					
2023	2.7	21	33.9	4,147	62.6
2024	2.6	17	26.6	3,866	54.3
Revenue Not Available					
2023	6.9	0	0.0	0	0.0
2024	7.2	2	3.1	43	0.6
Totals					
2023	100.0	62	100.0	6,623	100.0
2024	100.0	64	100.0	7,125	100.0
<i>Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Small Farm Loans

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes, as depicted in the following table. Although, performance level slightly trailed demographics, this level is excellent in light of performance context. Demographic data includes all small farms, not just those farms that sought traditional commercial financing. As such, actual small farm lending opportunities tend to significantly lag the percentage of the AA's farm that report revenues of \$1 million or less. Examiners do not compare the bank's performance directly against aggregate data; however, examiners reviewed aggregate data to determine the demand level for small farm

loans. Aggregate data for 2023 is 65.3 percent. Given this performance context, small farm lending performance level reflects excellent penetration.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: ID Non-MSA AA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000					
2023	96.4	75	93.8	4,827	82.1
2024	96.2	65	91.5	4,526	80.8
>\$1,000,000					
2023	2.8	4	5.0	1,010	17.2
2024	2.8	5	7.0	976	17.4
Revenue Not Available					
2023	0.8	1	1.3	45	0.8
2024	0.9	1	1.4	100	1.8
Totals					
2023	100.0	80	100.0	5,882	100.0
2024	100.0	71	100.0	5,602	100.0
<i>Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

POCATELLO AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN POCATELLO AA

The Pocatello AA is located in southeast Idaho and consists of all 24 CTs in Bannock County.

Economic and Demographic Data

The AA consists of 1 low-, 7 moderate-, 12 middle-, and 4 upper-income CTs. The following table details key demographic data for the AA.

Demographic Information of the Assessment Area						
Assessment Area: Pocatello AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	29.2	50.0	16.7	0.0
Population by Geography	87,018	3.0	26.0	55.0	15.9	0.0
Housing Units by Geography	34,550	3.2	27.8	55.8	13.2	0.0
Owner-Occupied Units by Geography	21,681	2.5	21.2	58.7	17.6	0.0
Occupied Rental Units by Geography	9,988	4.6	39.7	49.9	5.8	0.0
Vacant Units by Geography	2,881	3.0	36.3	54.5	6.2	0.0
Businesses by Geography	10,457	3.5	29.4	49.7	17.4	0.0
Farms by Geography	355	1.1	17.2	66.2	15.5	0.0
Family Distribution by Income Level	20,266	18.8	19.6	21.1	40.4	0.0
Household Distribution by Income Level	31,669	22.9	16.7	18.9	41.5	0.0
Median Family Income MSA - 38540 Pocatello, ID MSA		\$66,708	Median Housing Value			\$168,432
			Median Gross Rent			\$686
			Families Below Poverty Level			9.4%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The area’s largest non-farm employers include Idaho State University, the Pocatello/Chubbuck School District, and Portneuf Medical Center. Healthcare and growing university enrollment drive Pocatello’s economy.

Unemployment in the AA has been between state and national averages over the review period, as reflected in the table on the following page.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Bannock County	3.2	3.5	4.0
Idaho State	2.9	3.2	3.7
National Average	3.6	3.6	4.0
<i>Source: Bureau of Labor Statistics</i>			

Competition

According to the June 30, 2024, FDIC Deposit Market Share report, IB ranked 8th out of 10 institutions operating in the AA, with a market share of 6.6 percent. The institution operated 3 of the 17 total branches operated by all financial institutions in the market as of June 30, 2024.

Community Contact

Examiners contacted a representative of a local economic development organization. The contact expressed that start-up funding for small businesses was the area's primary credit need. The contact mentioned that local financial institutions were adequately addressing the need, though hoped to see more involvement by those institutions in community events.

Credit Needs

Considering area demographics, economic data, conversations with bank management and community contacts, examiners identified the primary credit need of the AA to be small business loans, specifically start-up funding.

CONCLUSIONS ON PERFORMANCE CRITERIA IN POCATELLO AA

LENDING TEST

IB's Lending Test performance in this AA is reasonable.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Small business lending receives greater weight in determining the overall rating. Excellent small business performance and poor small farm performance support this conclusion.

Small Business Loans

The bank's lending in low-income CTs is comparable to the percentage of businesses present in the AA in 2023 and 2024. IB's lending in moderate-income CTs significantly exceeds the percentage of businesses present in the AA in 2023 and 2024. Overall, this performance is excellent.

Geographic Distribution of Small Business Loans					
Assessment Area: Pocatello AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2023	3.5	1	3.2	700	13.6
2024	3.5	1	3.0	700	8.6
Moderate					
2023	29.6	16	51.6	3,150	61.2
2024	29.4	11	33.3	2,153	26.5
Middle					
2023	49.5	12	38.7	1,266	24.6
2024	49.7	17	51.5	3,669	45.2
Upper					
2023	17.4	2	6.5	33	0.6
2024	17.4	4	12.1	1,602	19.7
Not Available					
2023	0.0	0	0.0	0	0.0
2024	0.0	0	0.0	0	0.0
Totals					
2023	100.0	31	100.0	5,149	100.0
2024	100.0	33	100.0	8,124	100.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Small Farm Loans

During the evaluation period, IB made no loans within low-income CTs; however, the very low percentage of farms within low-income CTs indicates limited lending opportunities. In moderate-income CTs, IB originated one small farm loan in 2023 and no loans in 2024. Examiners considered the competitive market with larger financial institutions as well as the limited number of tracts contained within the AA. Examiners also reviewed aggregate data to determine the demand level for small farm loans. Aggregate data is 15.5 percent in 2023. Given this context, IB's geographic distribution performance is poor given its nominal lending in LMI CTs

Geographic Distribution of Small Farm Loans					
Assessment Area: Pocatello AA					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Low					
2023	1.1	0	0.0	0	0.0
2024	1.1	0	0.0	0	0.0
Moderate					
2023	17.7	1	5.9	15	2.2
2024	17.2	0	0.0	0	0.0
Middle					
2023	66.6	16	94.1	671	97.8
2024	66.2	13	100.0	498	100.0
Upper					
2023	14.6	0	0.0	0	0.0
2024	15.5	0	0.0	0	0.0
Not Available					
2023	0.0	0	0.0	0	0.0
2024	0.0	0	0.0	0	0.0
Totals					
2023	100.0	17	100.0	686	100.0
2024	100.0	13	100.0	498	100.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Borrower Profile

The distribution of borrowers in the AA reflects, given the demographics of the AA, reasonable penetration among businesses and excellent penetration of farm customers of different sizes.

Small Business Loans

The bank's penetration of lending to small businesses in the AA was below demographic data, as depicted on following table; however, as discussed, demographic data provides only a measure of potential opportunities in an area. Examiners reviewed aggregate lending data to determine demand level for small business loans. Aggregate data is 54.9 percent in 2023. Given this context, IB's performance is reasonable.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Pocatello AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2023	89.9	18	58.1	1,978	38.4
2024	89.3	14	42.4	3,988	49.1
>\$1,000,000					
2023	2.2	13	41.9	3,171	61.6
2024	2.2	17	51.5	3,374	41.5
Revenue Not Available					
2023	7.9	0	0.0	0	0.0
2024	8.5	2	6.1	762	9.4
Totals					
2023	100.0	31	100.0	5,149	100.0
2024	100.0	33	100.0	8,124	100.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Small Farm Loans

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes, as depicted in the following table. Although, performance level slightly trailed demographics, this level is excellent in light of performance context. Demographic data includes all small farms, not just those farms that sought traditional commercial financing. As such, actual small farm lending opportunities tend to significantly lag the percentage of the AA's farm that report revenues of \$1 million or less. Examiners do not compare the bank's performance directly against aggregate data; however, examiners reviewed aggregate data to determine the demand level for small farm loans. Aggregate data for 2023 is 55.2 percent. Given this performance context, small farm lending performance level reflects excellent penetration.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Assessment Area: Pocatello AA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000					
2023	98.3	16	94.1	486	70.8
2024	98.3	11	84.6	383	76.9
>\$1,000,000					
2023	0.6	1	5.9	200	29.2
2024	0.6	1	7.7	65	13.1
Revenue Not Available					
2023	1.1	0	0.0	0	0.0
2024	1.1	1	7.7	50	10.0
Totals					
2023	100.0	17	100.0	686	100.0
2024	100.0	13	100.0	498	100.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The borrower profile performance in the Twin Falls AA was slightly below performance in the full-scope AAs, otherwise performance in each limited-scope AA was generally consistent with performance in the full-scope AAs. Conclusions drawn from the limited-scope AAs did not alter the bank's overall performance rating. The following facts and data, including performance figures and demographic information, support these conclusions. Demographic data, including deposit market share information, geographic distribution and borrower profile tables for each limited-scope AA are in the appendices.

Twin Falls AA

Twin Falls AA is a contiguous area consisting wholly of both Twin Falls and Jerome Counties. During the review period, the bank originated 29 small business loans totaling \$6.3 million and 12 small farm loans totaling \$1.7 million.

Logan UT-ID AA

Logan UT-ID AA consists of the whole of Franklin County. No LMI CTs are present within the AA. During the review period, the bank originated 22 small business loans totaling \$3.1 million and 15 small farm loans totaling \$1.1 million.

APPENDICES

DESCRIPTION OF INSTITUTION’S LIMITED-SCOPE AAs

TWIN FALLS AA

IB operates one branch in the AA. According to the FDIC Deposit Market Share report as of June 30, 2024, 12 financial institutions operated 33 full-service branches within this AA. Of these institutions, IB ranked 12th, with 0.6 percent deposit market share.

Demographic Information of the Assessment Area						
Assessment Area: Twin Falls AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	13.0	73.9	13.0	0.0
Population by Geography	114,283	0.0	10.8	76.2	13.0	0.0
Housing Units by Geography	42,375	0.0	12.5	75.9	11.7	0.0
Owner-Occupied Units by Geography	27,556	0.0	9.2	77.2	13.6	0.0
Occupied Rental Units by Geography	12,206	0.0	20.6	71.3	8.1	0.0
Vacant Units by Geography	2,613	0.0	9.1	82.7	8.2	0.0
Businesses by Geography	14,544	0.0	15.6	66.8	17.6	0.0
Farms by Geography	1,231	0.0	4.5	80.3	15.1	0.0
Family Distribution by Income Level	27,949	18.7	17.8	23.4	40.1	0.0
Household Distribution by Income Level	39,762	21.8	17.6	20.1	40.5	0.0
Median Family Income MSA - 46300 Twin Falls, ID MSA		\$62,242	Median Housing Value			\$187,354
			Median Gross Rent			\$814
			Families Below Poverty Level			10.0%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

LOGAN UT-ID AA

IB operates one branch in the AA. According to the FDIC Deposit Market Share report as of June 30, 2024, 4 financial institutions operate 4 full-service branches within this AA. Of these institutions, IB ranked 4th, with 15.2 percent deposit market share.

Demographic Information of the Assessment Area						
Assessment Area: Logan UT-ID AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	14,194	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,890	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,713	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	719	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	458	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,896	0.0	0.0	100.0	0.0	0.0
Farms by Geography	241	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,534	15.2	21.4	20.7	42.7	0.0
Household Distribution by Income Level	4,432	19.2	17.1	22.0	41.7	0.0
Median Family Income MSA - 30860 Logan, UT-ID MSA		\$69,237	Median Housing Value			\$223,653
			Median Gross Rent			\$771
			Families Below Poverty Level			9.3%
Source: 2020 U.S. Census and 2024 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

LIMITED-SCOPE AA GEOGRAPHIC DISTRIBUTION AND BORROWER PROFILE TABLES

Geographic Distribution

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2023
Assessment Area:	Total Loans to Farms		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Twin Falls	11	1,909	0.0	0.0	15.2	9.1	67.5	81.8	17.3	9.1	0.0	0.0
Logan UT-ID	11	1,883	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%												

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2024
Assessment Area:	Total Loans to Farms		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Twin Falls	18	4,403	0.0	0.0	15.6	22.2	66.8	77.8	17.6	0.0	0.0	0.0
Logan UT-ID	11	1,195	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%												

Assessment Area Distribution of Loans to Farms by Income Category of the Geography												2023
Assessment Area:	Total Loans to Farms		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Twin Falls	9	1,338	0.0	0.0	4.6	0.0	80.8	100.0	14.6	0.0	0.0	0.0
Logan UT-ID	9	434	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%												

Assessment Area Distribution of Loans to Farms by Income Category of the Geography												2024
Assessment Area:	Total Loans to Farms		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Twin Falls	3	391	0.0	0.0	4.5	0.0	80.3	100.0	15.1	0.0	0.0	0.0
Logan UT-ID	6	639	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%												

Borrower Profile

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues									2023
Assessment Area:	Total Loans to Small Businesses		Businesses with Revenues <= 1MM		Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Twin Falls	11	1,909	90.1	45.5	2.3	54.5	7.6	0.0	
Logan UT-ID	11	1,883	91.3	72.7	1.4	27.3	7.2	00	
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%									

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues									2024
Assessment Area:	Total Loans to Small Businesses		Businesses with Revenues <= 1MM		Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Twin Falls	18	4,403	89.4	38.9	2.3	61.1	8.3	0.0	
Logan UT-ID	11	1,195	90.8	54.5	1.4	45.5	7.8	0.0	
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%									

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues							2023	
Assessment Area:	Total Loans to Farms		Farms with Revenues <= 1MM		Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Twin Falls	9	1,338	94.9	88.9	3.4	11.1	0.0	0.0
Logan UT-ID	9	434	99.2	88.9	0.4	11.1	0.4	0.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%								

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues							2024	
Assessment Area:	Total Loans to Farms		Farms with Revenues <= 1MM		Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Twin Falls	3	391	95.0	33.3	3.4	66.7	0.0	0.0
Logan UT-ID	6	639	99.2	83.3	0.4	16.7	0.4	0.0
Source: 2023 & 2024 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%								

SMALL 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) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The institution's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

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 institution 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.

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.

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.

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.

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.

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 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.

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.