



# Community Reinvestment Act

CRA Public File

January 1, 2026

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## INTRODUCTION

As part of our commitment to transparency and regulatory compliance, Icon Business Bank maintains a Community Reinvestment Act (CRA) Public File in accordance with the CRA regulation.

This public file is available for inspection by the public upon request, and at no cost. Should copies of documents be requested, a reasonable fee may be charged to cover copying and mailing expenses, if applicable. All contents of the public file are kept current as of April 1 of each calendar year.

- A complete CRA Public File is maintained at our main office and is accessible during regular business hours.
- Each branch location maintains a public file that includes:
  - The public section of Icon Business Bank's most recent CRA Performance Evaluation
  - A list of services provided by the branch
- Additionally, any information in the public file that pertains to the assessment area in which a branch is located will be made available within five calendar days of receiving a request.

Icon Business Bank is dedicated to serving our communities and ensuring that our operations align with the standards set forth by the CRA.

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# LOAN TO DEPOSIT RATIOS

In compliance with the Community Reinvestment Act (CRA) regulation, Icon Business Bank includes in its public file the loan-to-deposit ratio for each quarter of the previous calendar year. In addition, the Bank may, at its discretion, provide supplementary data related to its loan-to-deposit ratio to offer greater context and transparency.

The following table presents Icon Business Bank’s quarterly loan-to-deposit ratio data for the prior calendar year, as part of our commitment to regulatory transparency and our ongoing efforts to support and serve our communities.

<b>Quarter Ended</b>	<b>Loan to Deposit Ratio<sup>(1)</sup></b>
September 30, 2023.....	28.30% <sup>(2)</sup>
December 31, 2023 .....	127.40%
March 31, 2024 .....	121.13%
June 30, 2024 .....	96.30%
September 30, 2024.....	83.06%
December 31, 2024 .....	85.77%
March 31, 2025.....	73.76%
June 30, 2025 .....	77.21%
September 30, 2025.....	75.78%
(1) The Loan to The Loan-to-Deposit Ratio is calculated by dividing the institution’s net loans and leases by its total deposits. (2) The Bank opened effective August 22, 2023 and therefore, the Loan To Deposit Ratio as of September 30, 2023 reflects only one month of operations.	

## WRITTEN COMMENTS

In accordance with the Community Reinvestment Act (CRA) regulation, Icon Business Bank includes in its public file all written comments received from the public that specifically relate to the Bank's performance in meeting the credit needs of the communities we serve.

This includes:

- Comments received during the current calendar year and the two preceding calendar years
- Any institutional responses to those comments, provided that neither the comments nor responses contain:
  - Statements that reflect adversely on the good name or reputation of individuals (other than the institution), or
  - Content that would violate specific provisions of law if published

All applicable comments and responses, if any, are set forth below as part of our CRA Public File. Icon Business Bank is committed to listening to our communities and addressing their credit needs with integrity and responsiveness.

### Written Comments Received

Icon Business Bank has not yet received any written comments from the public regarding its performance in helping to meet community credit needs during the current calendar year or either of the two preceding calendar years.

As a result, there are no public comments or institutional responses to include in this section of the CRA Public File.

## PERFORMANCE EVALUATION

In accordance with the Community Reinvestment Act (CRA) regulation, Icon Business Bank includes in its public file a copy of the public section of its most recent CRA Performance Evaluation, as prepared by our regulatory agency. This document is added to the public file within 30 business days of its receipt from the regulatory agency, as required by regulation.

Icon Business Bank received a **Satisfactory** CRA rating, reflecting a reasonable record of meeting community credit needs consistent with its size and resources. Examiners found generally adequate lending within its assessment areas and reasonable geographic distribution, though lending to smaller businesses remained limited. No discriminatory practices or CRA-related complaints were identified. The Public Disclosure of the FDIC's Performance Evaluation, dated September 29, 2025, is attached hereto as **Exhibit A**.



## HMDA DISCLOSURE STATEMENT

The Community Reinvestment Act (CRA) regulation requires each financial institution that is required to report Home Mortgage Disclosure Act (HMDA) data to include in its public file a copy of the HMDA Disclosure Statement issued by the Federal Financial Institutions Examination Council (FFIEC) for each of the prior two calendar years.

Icon Business Bank is not required to submit HMDA data and therefore does not have HMDA Disclosure Statements to include in this public file.

## BRANCH INFORMATION

The tables below present information about our branch offices, current as of the date noted above.

### BRANCH OFFICES

<b>Riverside Branch</b>	
Opening Date:	August 22, 2023
Address:	3390 University Avenue, Suite 400 Riverside, California 92501 Riverside County
MSA	40140 – Riverside-San Bernardino-Ontario, CA
State:	06-California
County:	065 – Riverside County
Tract Code:	0303.00
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

<b>Orange County Branch</b>	
Opening Date:	March 3, 2025
Address:	3 Hutton Centre Drive Suite 150 Santa Ana, California 92707 Orange County
MSA	11244 – Anaheim-Santa Ana-Irvine, CA
State:	06-California
County:	059 – Orange County
Tract Code:	0740.03
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

### ADMINISTRATIVE OFFICES

<b>Riverside Headquarters</b>	
Address:	3390 University Avenue, Suite 400 Riverside, California 92501 Riverside County

# BRANCH OPENINGS AND CLOSURES

The Community Reinvestment Act regulation mandates that each financial institution include in its public file a list of branches it has opened or closed during the current year and the preceding two calendar years, along with their street addresses and geographies.

The following is a list of all such branches:

## BRANCH OPENINGS

<b>Riverside Branch</b>	
Opening Date:	<b>August 22, 2023</b>
Address:	3390 University Avenue, Suite 400 Riverside, California 92501 Riverside County
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

<b>Las Vegas Branch</b>	
Opening Date:	<b>April 2, 2024</b>
Address:	8180 Rafael Rivera Way, Suite 210 Las Vegas, NV 89113 Clark County
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

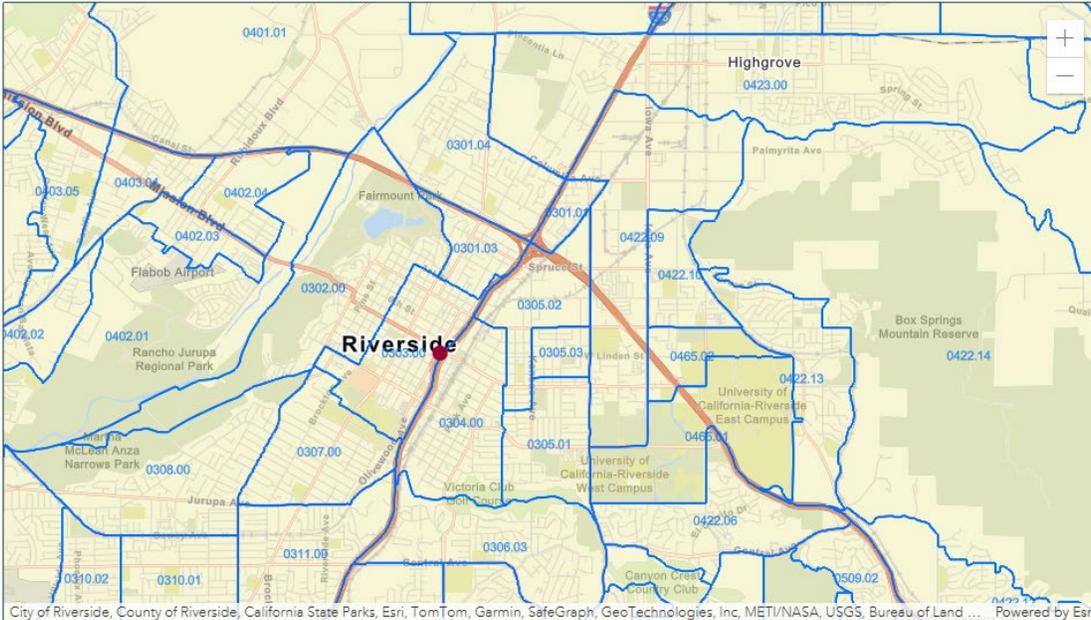
<b>Orange County Branch</b>	
Opening Date:	<b>March 3, 2025</b>
Address:	3 Hutton Centre Drive Suite 150 Santa Ana, California 92707 Orange County
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

## BRANCH CLOSURES

<b>Las Vegas Branch</b>	
Closing Date:	<b>December 27, 2024</b>
Address:	8180 Rafael Rivera Way, Suite 210 Las Vegas, NV 89113 Clark County
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

# BRANCH GEOGRAPHIES AND MAPS

**Riverside Branch Office**  
**3390 University Avenue, Suite 400**  
**Riverside, California 92501**



City of Riverside, County of Riverside, California State Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land ... Powered by Esri  
 ● Matched Address: 3390 University Ave, Riverside, California, 92501  
 MSA: 40140 - RIVERSIDE-SAN BERNARDINO-ONTARIO, CA || State: 06 - CALIFORNIA || County: 065 - RIVERSIDE COUNTY || Tract Code: 0303.00

**FFIEC 2025 FFIEC Geocode Census Report**

Matched Address: 3390 University Ave, Riverside, California, 92501  
 MSA: 40140 - RIVERSIDE-SAN BERNARDINO-ONTARIO, CA  
 State: 06 - CALIFORNIA  
 County: 065 - RIVERSIDE COUNTY  
 Tract Code: 0303.00

**Summary Census Demographic Information**

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

**Census Population Information**

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

**Census Income Information**

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

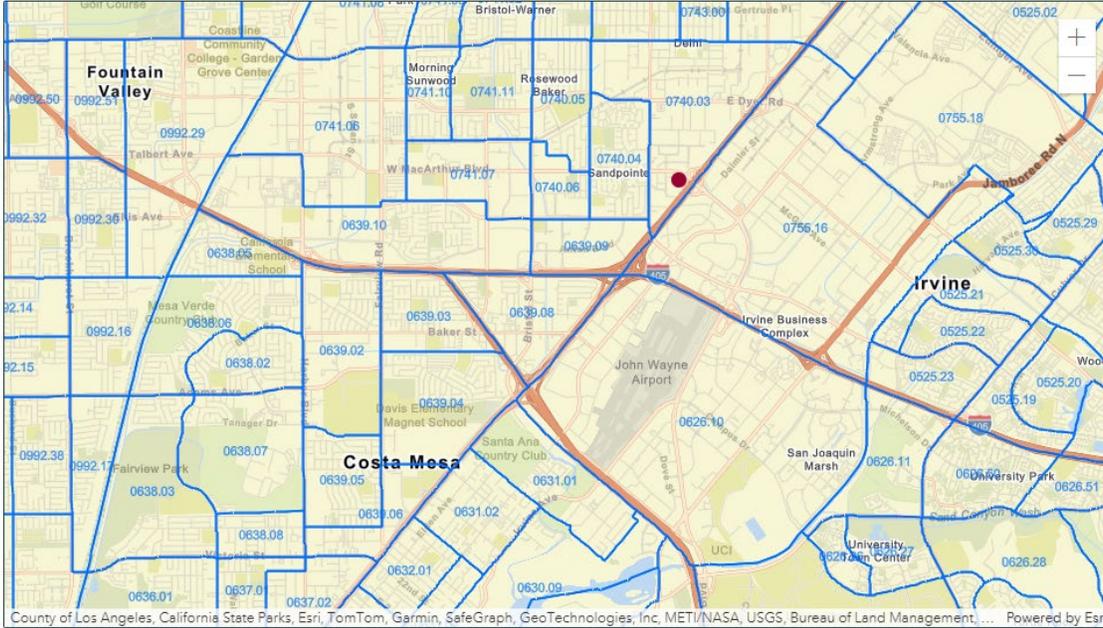
**Census Housing Information**

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

**Orange County Branch Office**  
**3 Hutton Centre Drive, Suite 150**

**Santa Ana, California 92707  
Orange County**

FFIEC Geocoding/Mapping System -- 2025



● Matched Address: 3 Hutton Centre Dr, Santa Ana, California, 92707  
MSA: 11244 - ANAHEIM-SANTA ANA-IRVINE, CA II State: 06 - CALIFORNIA II County: 059 - ORANGE COUNTY II Tract Code: 0740.03

Matched Address: 3 Hutton Centre Dr, Santa Ana, California, 92707  
MSA: 11244 - ANAHEIM-SANTA ANA-IRVINE, CA  
State: 06 - CALIFORNIA  
County: 059 - ORANGE COUNTY  
Tract Code: 0740.03

**Summary Census Demographic Information**

Tract Income Level	
Underserved or Distressed Tract	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

**Census Population Information**

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

**Census Income Information**

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2025 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2020 Tract Median Family Income	
2025 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

**Census Housing Information**

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

# SERVICES AND FEES

## Lending and Other Non-Deposit Products and Services

Icon Business Bank provides flexible lending solutions tailored to the unique needs of both individuals and businesses. Each loan request is evaluated independently, with credit decisions based on the applicant's creditworthiness and in alignment with prudent banking standards and regulatory guidelines.

We proudly offer a broad range of financial products and services to qualified consumers, businesses, and professionals, including:

- Commercial and Industrial Loans
- Asset-Based Lending (ABL) Loans
- Real Estate Loans
- Small Business Administration (SBA) Loans
- Indirect Auto Loans – Icon Business Bank may, from time to time, purchase vehicle retail installment contracts originated by third-party dealers.

**Personal and Business Banking Fee Schedules**



**PERSONAL BANKING FEE SCHEDULE**

Effective January 1, 2026

**ACCOUNT/BRANCH SERVICES**

Account Research/Reconciliation (Minimum 1 Hour) .....\$40.00

**ATM/Debit Card:**

In-Network ATM Transaction .....No Charge  
 Out-of-Network ATM Fee<sup>1</sup> ..... Fee Set by ATM Owner  
 Debit Card Replacement .....\$10.00  
 Debit Card Priority Delivery.....\$35.00  
 Debit Card Expedited Delivery .....\$50.00  
 International Purchase Transaction Fee .....1%

Cashier's Check.....\$10.00  
 Chargeback/Returned Deposit Item.....No Charge  
 Check Printing..... Price Varies by Style and Quantity

**Copies:**

On-Us Check .....\$3.00  
 Deposited Check .....\$3.00  
 Statement Copy..... \$3.00

**Collection Items:**

Domestic Item Collection (Incoming/Outgoing)..... \$35.00  
 Foreign Item Collection (Incoming/Outgoing) ..... \$50.00

Counter Checks ..... \$2.00  
 Duplicate Statements (Per Account, Per Month)..... \$5.00  
 Early Account Closure (Within First 90 Days) ..... \$15.00  
 Endorsement Guarantee ..... \$5.00

**Foreign Currency:**

Foreign Currency Exchange (Per Order)..... \$20.00  
 Foreign Currency Purchase (Per Purchase) ..... \$20.00  
 Home Delivery (Additional Cost) ..... \$10.00

**Legal Process:**

Hourly Rate .....\$125.00  
 Minimum Fee .....\$125.00

**Merchant Transactions (Debit Card):**

Icon Business Bank ..... No Surcharge  
 Merchant ..... Fee Set by Merchant

Notary Service (Per Signature).....\$15.00

**Non-Sufficient Funds (NSF):**

Non-Sufficient Funds (Per Item) ..... No Charge  
 Fee assessed when a check or electronic transaction (such as ACH or online bill payment) is returned unpaid due to insufficient funds in your account. This fee does not apply to ATM withdrawals or one-time debit card transactions.

**Overdraft Fee<sup>2</sup>:**

Overdraft (Per Item) .....\$35.00  
 An Overdraft Fee is charged each time a check, ACH payment, debit card purchase, or other transaction is paid, even though your account does not have enough available funds to cover the transaction, resulting in a negative balance. The fee is assessed per item paid into an overdraft. The fee does not apply to ATM withdrawals or one-time debit card transactions.

**Online Banking:**

Account Transfers .....No Charge  
 Bill Pay .....No Charge  
 E-Statements .....No Charge  
 Mobile Banking .....No Charge  
 Monthly Service Fee .....No Charge  
 Signature Guarantee .....\$5.00

**Stop Payments:**

Stop Payment .....\$30.00  
 Online Stop Payment.....\$15.00  
 Verification of Deposit (VOD) .....\$20.00

**Wire Transfer Services:**

Incoming (Domestic & International).....\$15.00  
 Outgoing (Domestic) .....\$30.00  
 Outgoing (International)<sup>3</sup> .....\$40.00  
 Outgoing (Foreign FX)<sup>3</sup> .....\$50.00  
 Wire Tracer (Domestic & International).....\$10.00

<sup>1</sup> An In-Network ATM transaction is any withdrawal, deposit, transfer, or balance inquiry performed at an ATM owned by Icon Business Bank or within the MoneyPass® Network; all other ATM transactions are considered Out-of-Network.

<sup>2</sup> A maximum of four (4) Overdraft Fees may be charged to an account in a single day, with a maximum amount of \$140.00

<sup>3</sup> Additional intermediary bank fees may apply to outgoing international wire transfers.

All fees and charges are effective January 1, 2026, and are subject to change. For questions, please contact us at (888) 383-1954.

**ICON BUSINESS BANK** **BUSINESS BANKING FEE SCHEDULE**  
Effective January 1, 2026

**ACCOUNT/BRANCH SERVICES**

Account Research/Reconciliation (Minimum 1 hour) .....	\$40.00
<b>ATM/Debit Card:</b>	
In-Network ATM Transaction .....	No Charge
Out-of-Network ATM Fee <sup>1</sup> .....	Fee Set by ATM Owner
Debit Card Replacement .....	\$10.00
Debit Card Priority Delivery .....	\$35.00
Debit Card Expedited Delivery .....	\$50.00
Cashier's Check .....	\$10.00
Chargeback/Returned Deposit Item .....	No Charge
Check Printing .....	Price Varies by Style and Quantity
<b>Copies:</b>	
On-Us Check .....	\$3.00
Deposited Check .....	\$3.00
Statement Copy .....	\$3.00
<b>Collection Items:</b>	
Domestic Item Collection (Incoming/Outgoing) .....	\$35.00
Foreign Item Collection (Incoming/Outgoing) .....	\$50.00
Counter Checks .....	\$2.00
<b>Currency Furnished or Received:</b>	
Other Accounts (Per Thousand) .....	\$0.25
Duplicate Statements (Per Account, Per Month) .....	\$5.00
Early Account Closure (Within First 90 Days) .....	\$15.00
Endorsement Guarantee .....	\$5.00
<b>Foreign Currency:</b>	
Foreign Currency Exchange (Per Order) .....	\$20.00
Foreign Currency Purchase (Per Purchase) .....	\$20.00
Home Delivery (Additional Cost) .....	\$10.00
<b>Legal Process:</b>	
Hourly Rate .....	\$125.00
Minimum Fee .....	\$125.00
<b>Merchant Transactions (Debit Card):</b>	
Icon Business Bank .....	No Surcharge
Merchant .....	Fee Set by Merchant
Notary Service (Per Signature) .....	\$15.00

**Non-Sufficient Funds (NSF)<sup>2</sup>:**

Non-Sufficient Funds (Per Item) ..... \$35.00  
 Fee assessed when a check or electronic transaction (such as ACH or online bill payment) is returned unpaid due to insufficient funds in your account. This fee does not apply to ATM withdrawals or one-time debit card transactions.

**Overdraft Fee<sup>3</sup>:**

Overdraft (Per Item) ..... \$35.00  
 An Overdraft Fee is charged each time a check, ACH payment, debit card purchase, or other transaction is paid, even though your account does not have enough available funds to cover the transaction, resulting in a negative balance. The fee is assessed per item paid into an overdraft. The fee does not apply to ATM withdrawals or one-time debit card transactions.

**Online Banking:**

Account Transfers ..... No Charge  
 Bill Pay ..... No Charge  
 E-Statements ..... No Charge  
 Mobile Banking ..... No Charge  
 Monthly Service Fee ..... No Charge  
 Signature Guarantee ..... \$5.00

**Stop Payments:**

Stop Payment ..... \$30.00  
 Online Stop Payment ..... \$15.00  
 Verification of Deposit (VOD) ..... \$20.00

**WIRE TRANSFER SERVICES**

**Initiated in Person:**

Incoming (Domestic & International) ..... \$15.00  
 Outgoing (Domestic) ..... \$30.00  
 Outgoing (International)<sup>4</sup> ..... \$40.00  
 Outgoing (Foreign FX)<sup>4</sup> ..... \$50.00

**Online Banking Wires:**

Outgoing (Domestic) ..... \$15.00  
 Outgoing (USD International)<sup>4</sup> ..... \$20.00  
 Wire Tracer (Domestic & International) ..... \$10.00

<sup>1</sup> An In-Network ATM transaction is any withdrawal, deposit, transfer, or balance inquiry performed at an ATM owned by Icon Business Bank or within the MoneyPass® Network; all other ATM transactions are considered Out-of-Network.

<sup>2</sup> A maximum of six (6) Non-Sufficient Funds (NSF) fees may be charged to an account in a single day, with a maximum amount of \$210.00

<sup>3</sup> A maximum of six (6) Overdraft Fees may be charged to an account in a single day, with a maximum amount of \$210.00

<sup>4</sup> Additional intermediary bank fees may apply to outgoing international wire transfers.

All fees and charges are effective January 1, 2026, and are subject to change. For questions, please contact us at (888) 383-1954.



**ICON BUSINESS BANK** **BUSINESS BANKING FEE SCHEDULE**  
Effective January 1, 2026

**ANALYZED BUSINESS CHECKING FEES**

**Currency Furnished or Received:**

Analyzed Checking (Per Thousand)	\$0.25
Analysis Monthly Maintenance Fee (Per Account)	\$25.00
Deposit (Per Transaction)	\$1.00
Deposited Item (Deposited Checks)	\$0.15
ACH Credits	\$0.15
ACH Debits	\$0.25
Check/Other Debits (Per Debit Item)	\$0.25
Mobile Deposit	\$0.15

**TREASURY MANAGEMENT FEES**

**ACH Origination Services**

ACH Origination Setup Fee (Per Account)	\$30.00
Monthly Maintenance Fee (Per Account)	\$25.00
ACH Origination Debit (Per Item)	\$0.15
ACH Origination Credit (Per Item)	\$0.15
Same Day ACH Origination (Per Item)	\$0.50
ACH Batch	\$2.00
ACH/NACHA Rules Book or Online Version (Annually)	\$100.00
ACH Reversal/Deletion (Per Item)	\$20.00
Origination Return (Per Item)	\$5.00

**Remote Deposit Services**

Remote Deposit Setup Fee (One Time)	\$100.00
Monthly Access Fee (Per Relationship)	\$50.00
Remote Deposit Scanner	Quotes Available
Remote Deposit Fee (Each Deposit Ticket)	\$1.00

**Positive Pay Services**

Positive Pay Setup	No Charge
Monthly Service Fee (Per Account)	\$10.00
ACH Blocker Fee (Per Account)	\$25.00
Exception Item Fee (Checks/ACH/Payee)	\$0.50

**Sweep Services**

Monthly Service Fee (Per Account)	\$20.00
Transaction Fee (Per Transfer)	\$0.50
Loan Sweep Monthly Fee (Per Loan)	\$150.00

**ADDITIONAL FEES**

**Deposit Account Control Agreement (DACA)**

DACA Set-Up	\$350.00
DACA Monthly Maintenance Fee	\$150.00

**Contractor Retention Escrow Services**

Annual Maintenance Fee	\$1,500.00
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**Cash Vault Services**

Cash Vault Services	Quotes Available
Smart Safe	Quotes Available

**Lockbox Services**

**PO Box Rental Fees:**

Monthly (Per Box)	\$125.00
Annual Reserve Box (Per Box)	\$150.00
Maintenance Fee (Monthly)	\$150.00
Item Processing (Each)	\$0.50
Image Backup (Each)	\$0.10
Additional Lockbox Services	Quotes Available

**Merchant Services**

Merchant Services	Quotes Available
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**Payroll Services**

Payroll Services	Quotes Available
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**Digital Invoicing**

Digital Invoicing	Quotes Available
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All fees and charges are effective January 1, 2026, and are subject to change. For questions, please contact us at (888) 383-1954.

## Personal Banking Product Guide



### PERSONAL BANKING PRODUCT GUIDE

Effective January 1, 2026

#### PERSONAL CHECKING OPTIONS

ACCOUNT FEATURES	ESSENTIAL CHECKING	ELEVATED CHECKING
Minimum Opening Deposit	\$50	\$500
Balance Requirement Fee/ Monthly Service Fee	\$5	\$15
Ways to Avoid the Monthly Service Fee	You can avoid the \$5 monthly service fee with one of the following during each statement cycle: <ul style="list-style-type: none"> <li>Maintain a minimum daily balance of \$100 or more; or</li> <li>Receive a qualifying<sup>1</sup> monthly direct deposit of \$500 or more to the account</li> </ul>	You can avoid the \$15 monthly service fee with one of the following during each statement cycle: <ul style="list-style-type: none"> <li>Maintain a minimum daily balance of \$2,500 or more; or</li> <li>Receive a qualifying<sup>1</sup> monthly direct deposit of \$1,500 or more to the account</li> </ul>
Interest Bearing	No	No
Additional Features and/or Account Limitations	<ul style="list-style-type: none"> <li>Free e-Statements</li> <li>Check images included with the monthly statement</li> </ul>	<ul style="list-style-type: none"> <li>Free e-Statements</li> <li>Three (3) free cashier's checks per month</li> <li>One (1) free foreign currency order or exchange per year</li> <li>Check images included with the monthly statement</li> <li>First initial box of bank image checks is free upon account opening</li> </ul>

#### PERSONAL SAVINGS OPTIONS

ACCOUNT FEATURES	ESSENTIAL SAVINGS	YOUTH SAVINGS	CERTIFICATES OF DEPOSIT
Minimum Opening Deposit	\$100	\$5	\$1,000
Balance Requirement Fee/ Monthly Service Fee	None	None	None
Ways to Avoid the Monthly Service Fee	Not Applicable	Not Applicable	Not Applicable
Minimum Daily Balance to Accrue Interest	Interest is paid at a variable rate on any balance of \$0.01 or greater. Rates are subject to change at any time. Please contact a Banker for rate listing.	Interest is paid at a variable rate on any balance of \$0.01 or greater. Rates are subject to change at any time. Please contact a Banker for rate listing.	Interest is paid at a fixed rate on any balance of \$10,000 or greater. The rate is fixed for the term of the certificate of deposit.
Interest Bearing <sup>2</sup>	Yes	Yes	Yes
Account Limitations	ATM/Debit cards are not permitted for use with savings accounts.	Must be 17 years of age or under to open.	Early Withdrawal penalties may apply (10-calendar-day grace period). Please refer to the Deposit Account Agreement for details.

<sup>1</sup> A Qualifying Direct Deposit is your regular income, like your paycheck, pension, or government benefits, sent electronically by your employer or payer. Transfers or deposits made by you (at a branch, ATM, or online) don't qualify.

<sup>2</sup> See the Deposit Account Agreement and Disclosures for additional information regarding interest compounding and frequency.

**PERSONAL MONEY MARKET OPTIONS**

ACCOUNT FEATURES	PERSONAL MONEY MARKET
Minimum Opening Deposit	\$2,500
Balance Requirement Fee/Monthly Service Fee	\$20
Ways to Avoid the Monthly Service Fee	You can avoid the \$20 monthly service fee by maintaining a minimum daily balance of \$2,500.
Minimum Daily Balance to Accrue Interest	Interest is paid at a variable rate on any balance of \$2,500 or greater. Rates are subject to change at any time. Please contact a Banker for rate listing.
Interest Bearing <sup>2</sup>	Yes
Account Limitations	ATM/Debit cards are not permitted for use with money market accounts.

**PERSONAL SERVICES**

ONLINE BANKING
<a href="http://www.iconbusinessbank.com">www.iconbusinessbank.com</a>
Account Balance & Activity Inquiry
Bill Payment
Stop Payments
Transfer Funds
View and Print Check Images
View and Print Statements

MOBILE BANKING
Account Balance & Activity Inquiry
Bill Payment
Mobile Deposits
Transfer Funds
Apple Pay <sup>®</sup>
Google Pay <sup>®</sup>
Zelle <sup>®</sup>

DEBIT CARD	
ATM Cash Withdrawal Daily Limit	\$500
Point-of-Sale Daily Limit	\$1,500

MoneyPass Network ATM; Surcharge-Free at 32,000 Network ATM Locations.

Visit [www.moneypass.com](http://www.moneypass.com) for Specific Locations.

**BRANCH LOCATIONS**

CORPORATE OFFICE & RIVERSIDE BRANCH	ORANGE COUNTY BRANCH
3390 University Avenue, Suite 400 Riverside, CA 92501	3 Hutton Centre Drive, Suite 150 Santa Ana, CA 92707

<sup>2</sup> See the Deposit Account Agreement and Disclosures for additional information regarding interest compounding and frequency.

Please refer to the Deposit Account Agreement and Disclosures for other important terms and conditions.

All fees and charges are effective as of January 1, 2026, and are subject to change. If you have questions, please call us at 888.383.1954.

**Business Banking Product Guide**



**BUSINESS BANKING PRODUCT GUIDE**  
Effective January 1, 2026

**BUSINESS CHECKING OPTIONS**

ACCOUNT FEATURES	ICON ESSENTIAL CHECKING	ICON EDGE CHECKING	ICON ELITE CHECKING	ANALYZED BUSINESS CHECKING	INTEREST ON LAWYERS' TRUST ACCOUNT (IOLTA)
<b>Product Overview</b>	Essential Business Checking provides a straightforward and convenient way for small businesses to manage their everyday banking needs. It provides the core features you need to handle deposits, payments, and account access, without unnecessary extras or high fees.	Icon Edge Checking is built for growing businesses and organizations that need flexibility and higher transaction limits. It offers enhanced checking features, increased deposit and debit allowances, and convenient access through online and mobile banking, bill pay, and a business debit card.	Icon Elite Checking is designed for businesses and organizations with higher balances and frequent transactions. It offers increased deposit and debit limits, fee waivers, and service discounts, providing convenient access and enhanced features for more complex banking needs.	The Analyzed Business Checking is designed for companies and organizations that want flexibility and cost efficiency through an earnings credit system. Earnings credits are applied to reduce or eliminate service fees, making it a cost-effective solution for managing complex banking needs.	An IOLTA (Interest on Lawyers' Trust Account) is an interest-bearing account for attorneys and law firms to hold nominal or short-term client funds. Interest is remitted to the state's IOLTA program to support legal aid, while client funds remain protected and compliant with state bar requirements.
<b>Best for</b>	Small businesses, sole proprietors, startups	Established businesses, growing companies, and nonprofits	Established businesses and corporations	Establish businesses and corporations that manage high transaction volumes and utilize multiple treasury services.	Attorneys, law firms, and legal professionals
<b>Minimum Opening Deposit</b>	\$100.00	\$100.00	\$100.00	\$1,000.00	\$100.00
<b>Balance Requirement Fee/ Monthly Service Fee</b>	\$10.00	\$20.00	\$30.00	\$25.00	None
<b>Ways to Avoid the Monthly Service Fee</b>	You can avoid the \$10.00 monthly service fee by maintaining a minimum daily balance of \$500 or more.	You can avoid the \$20.00 monthly service fee by maintaining a minimum daily balance of \$2,500 or more.	You can avoid the \$30.00 monthly service fee by maintaining a minimum daily balance of \$5,000 or more.	Service fees may be offset by an earnings credit. The earnings credit is calculated each analysis period and may only be applied to charges incurred during that same month. Unused credits will not carry over to subsequent periods.	Not Applicable
<b>Checks Deposited per Statement Cycle</b> (Deposited Check Items)	Up to 25 free, then \$0.15 per check deposited	Up to 50 free, then \$0.15 per check deposited	Up to 100 free, then \$0.15 per check deposited	Service fees may be offset by an earnings credit. <sup>1</sup>	None
<b>Checks/Debits per Statement Cycle</b> (Checks and ACH Debits)	Up to 25 free, then \$0.25 each	Up to 50 free, then \$0.25 each	Up to 100 free, then \$0.25 each	Service fees may be offset by an earnings credit. <sup>1</sup>	None
<b>Interest Bearing<sup>2</sup></b>	No	No	No	No	Interest is paid at a variable rate on any balance of \$0.01 or greater. Rates are subject to change at any time. Please contact a banker for the current rate listing.
<b>Additional Benefits</b>	<ul style="list-style-type: none"> <li>• Online Banking</li> <li>• Mobile Banking</li> <li>• Bill Payment</li> <li>• eStatements</li> <li>• Business Debit Card</li> <li>• Monthly service fee and transaction fees waived for nonprofits and associations</li> </ul>	<ul style="list-style-type: none"> <li>• Online Banking</li> <li>• Mobile Banking</li> <li>• Bill Payment</li> <li>• eStatements</li> <li>• Business Debit Card</li> <li>• \$50 discount on initial check order</li> </ul>	<ul style="list-style-type: none"> <li>• Online Banking</li> <li>• Mobile Banking</li> <li>• Bill Payment</li> <li>• eStatements</li> <li>• Business Debit Card</li> <li>• \$100 discount on initial check order</li> <li>• ACH Setup Fee Waived</li> <li>• RDC Setup Fee Waived</li> </ul>	<ul style="list-style-type: none"> <li>• Online Banking</li> <li>• Mobile Banking</li> <li>• Bill Payment</li> <li>• eStatements</li> <li>• Earnings credit to offset fees</li> <li>• Customized treasury services</li> <li>• Scalability for larger operations</li> <li>• Optimized Cash Management</li> </ul>	<ul style="list-style-type: none"> <li>• Online Banking</li> <li>• Mobile Banking</li> <li>• eStatements</li> <li>• 5 complimentary cashier's checks per month</li> <li>• Automatic interest handling</li> </ul>

1. An earnings credit rate is calculated on the investable balance and applied to offset service fees. Please refer to the Business Fee Schedule for applicable analysis and transaction fees.  
2. See the Deposit Account Agreement & Disclosures additional information regarding interest compounding and frequency.



**COMMUNITY REINVESTMENT ACT  
PUBLIC FILE**  
(Updated January 1, 2026)



**BUSINESS BANKING PRODUCT GUIDE**

Effective January 1, 2026

**BUSINESS SAVINGS OPTIONS**

ACCOUNT FEATURES	ESSENTIAL BUSINESS SAVINGS	BUSINESS MONEY MARKET	CERTIFICATES OF DEPOSIT
<b>Minimum Opening Deposit</b>	\$1,000	\$5,000	\$10,000
<b>Balance Requirement Fee/ Monthly Service Fee</b>	\$5.00	\$20.00	None
<b>Ways to Avoid the Monthly Service Fee</b>	You can avoid the \$5.00 monthly service fee by maintaining a minimum daily balance of \$1,000 or more.	You can avoid the \$20.00 monthly service fee by maintaining a minimum daily balance of \$5,000 or more.	Not Applicable
<b>Minimum Daily Balance to Accrue Interest</b>	Interest is paid at a variable rate on any balance of \$0.01 or greater. Rates are subject to change at any time. Please contact a banker for the current rate listing.	Interest is paid at a variable rate on any balance of \$0.01 or greater. Rates are subject to change at any time. Please contact a banker for the current rate listing.	Interest is paid at a fixed rate on any balance of \$10,000 or greater. The rate is fixed for the term of the certificate of deposit.
<b>Interest Bearing<sup>2</sup></b>	Yes	Yes	Yes
<b>Account Limitations</b>	ATM/Debit cards are not permitted for use with Business Savings accounts.	ATM/Debit cards are not permitted for use with Business Money Market accounts.	Early Withdrawal penalties may apply (10-calendar-day grace period). Please refer to the Deposit Account Agreement and Disclosures for details.

**BUSINESS SERVICES**

ONLINE BANKING
<a href="http://www.iconbusinessbank.com">www.iconbusinessbank.com</a>
Account Balance & Activity Inquiry
Bill Payment
Stop Payments
Transfer Funds
Quicken*/QuickBooks® Direct Connect
Quicken*/QuickBooks® Web Connect
View and Print Check Images
View and Print Statements
Wire Transfers

MOBILE BANKING
Account Balance & Activity Inquiry
Bill Payment
Mobile Deposit
Transfer Funds
Apple Pay®
Google Pay®

TREASURY SERVICES
ACH Origination
Courier
Digital Invoicing
Lockbox
Merchant Services
Positive Pay Services (Fraud Prevention)
Remote Deposit Capture
Sweep Services
Wire Transfer Services

BUSINESS DEBIT CARD	
Cash Withdrawal Daily Limit	\$1,000.00
Point-of-Sale Daily Limit	\$5,000.00

MoneyPass Network ATM; Surcharge-Free at 32,000 Network ATM Locations.

Visit [www.moneypass.com](http://www.moneypass.com) for specific locations.

**BRANCH LOCATIONS**

CORPORATE OFFICE & RIVERISDE BRANCH	ORANGE COUNTY BRANCH
3390 University Avenue, Suite 400 Riverside, CA 92501	3 Hutton Centre Drive, Suite 150 Santa Ana, CA 92707

2. See the Deposit Account Agreement and Disclosures for additional information regarding interest compounding and frequency.

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All fees and charges are effective as of January 1, 2026, and are subject to change. If you have questions, please call us at 888.383.1954.

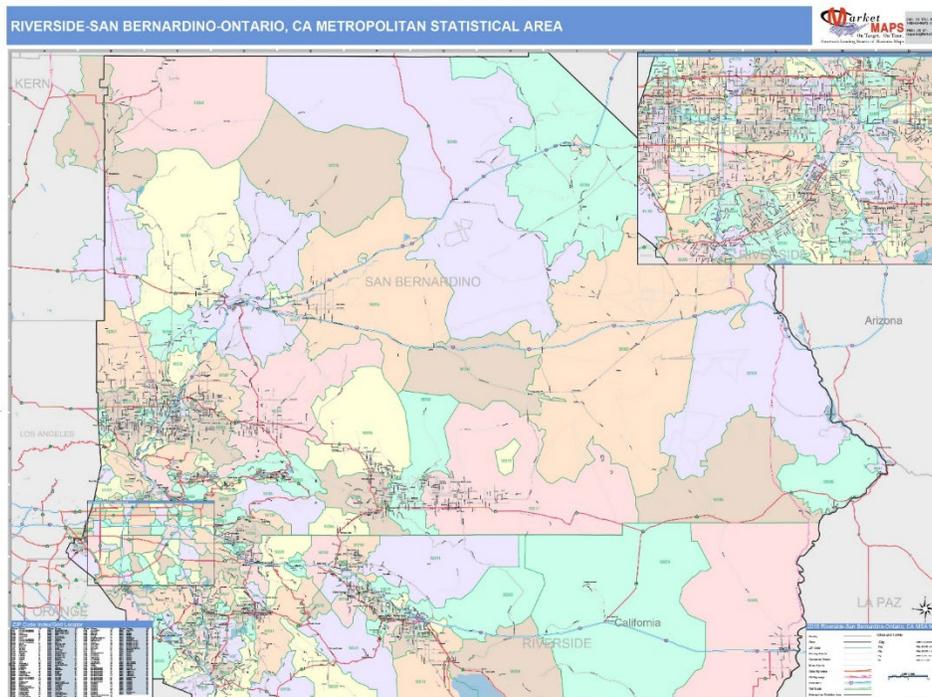


# ASSESSMENT AREAS

## Riverside-San Bernardino-Ontario, CA Metropolitan Statistical Area

The Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA), located in Southern California, is a diverse and rapidly growing region that includes Riverside and San Bernardino Counties. It is characterized by a significant small business presence, with industries such as logistics, healthcare, retail, and manufacturing playing vital roles in the local economy. The area's business landscape is supported by a mix of micro-businesses and larger enterprises, reflecting a dynamic entrepreneurial ecosystem.

Household income levels in the MSA vary widely, with a significant proportion of low- to moderate-income households, particularly in urban and underserved areas. Median household income in the region generally falls below the California state average, creating economic challenges for many residents. However, some suburban communities in the MSA exhibit higher income levels, reflecting a degree of economic stratification. This economic diversity underscores the importance of tailored financial services and credit availability to support both small businesses and households across the income spectrum.



CENSUS TRACT DATA RIVERSIDE-SAN BERNARDINO-ONTARIO METROPOLITAN STATISTICAL AREA								
Tract Income Level	# of Tracts	Tract Population	Number of Households	Number of Housing Units	Number of Owner- Occupied Housing Units	Percent of Owner- Occupied Housing Units	Average 2024 Est. Tract Median Family Income	
Low	48	183,332	56,760	65,594	19,792	30.17%	\$41,051.48	
Moderate	282	1,254,329	372,406	428,240	189,178	44.18%	\$80,414.11	
Middle	362	1,719,985	521,515	592,595	338,093	57.05%	\$100,026.62	
Upper	279	1,398,351	417,538	468,619	330,059	70.43%	\$115,553.76	
Unknown	<u>13</u>	<u>43,842</u>	<u>8,284</u>	<u>11,394</u>	<u>4,911</u>	43.10%	\$93,901.54	
<b>Total</b>	<b>984</b>	<b>4,599,839</b>	<b>1,376,503</b>	<b>1,566,442</b>	<b>882,033</b>	<b>56.31%</b>		
<b>Share of Total</b>								
Low	4.88%	3.99%	4.12%	4.19%	2.24%			
Moderate	28.66%	27.27%	27.05%	27.34%	21.45%			
Middle	36.79%	37.39%	37.89%	37.83%	38.33%			
Upper	28.35%	30.40%	30.33%	29.92%	37.42%			
Unknown	<u>1.32%</u>	<u>0.95%</u>	<u>0.60%</u>	<u>0.73%</u>	<u>0.56%</u>			
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>			
<b>Total for Low-and Moderate-Income Tracts</b>								
Actual								
Percent of								
Total	330	1437661	429166	493834	208970			
	33.54%	31.25%	31.18%	31.53%	23.69%			

A more detailed breakdown of census tract data for the Riverside–San Bernardino–Ontario Metropolitan Statistical Area is attached hereto as **Exhibit B**. This exhibit provides a comprehensive, tract-level overview of key demographic and economic indicators used in evaluating community credit needs and CRA performance. For each census tract, the exhibit identifies the tract code, income classification (low-, moderate-, middle-, or upper-income), and whether the tract is designated as distressed or underserved. It also includes multiple measures of economic capacity, such as the median family income expressed both as a percentage and a dollar amount, the estimated 2024 tract median family income, and the 2020 tract median family income. Additionally, the exhibit details the total population of each tract, the proportion and number of minority residents, and housing-related metrics including the number of owner-occupied units and the number of one-to-four-family housing units. Collectively, this information offers a granular view of the socioeconomic landscape within the assessment area.

## Anaheim-Santa Ana-Irvine, CA Metro Division

The Anaheim-Santa Ana-Irvine Metropolitan District, part of Orange County in Southern California, is a thriving economic region with a strong presence of small businesses, particularly in industries such as technology, healthcare, tourism, retail, and professional services. The area benefits from its proximity to major economic hubs and a highly skilled workforce, fostering a vibrant entrepreneurial environment.

Household income levels in the district reflect a broad range, with many affluent communities alongside pockets of low- to moderate-income households, particularly in more urbanized areas. The median household income in this district is generally higher than the state average, though the high cost of living creates financial challenges for some residents. The economic and demographic diversity of the region highlights the need for accessible financial services and credit solutions tailored to support small businesses and households across varying income levels.



A more detailed breakdown of census tract data for the Anaheim – Santa Ana – Irvine Metropolitan District is attached hereto as **Exhibit C**. This exhibit provides a comprehensive, tract-level overview of key demographic and economic indicators used in evaluating community credit needs and CRA performance. For each census tract, the exhibit identifies the tract code, income classification (low-, moderate-, middle-, or upper-income), and whether the tract is designated as distressed or underserved. It also includes multiple measures of economic capacity, such as the median family income expressed both as a percentage and a dollar amount, the estimated 2024 tract median family income, and the 2020 tract median family income. Additionally, the exhibit details the total population of each tract, the proportion and number of minority residents, and housing-related metrics including the number of owner-occupied units and the number of one-to-four-family housing units. Collectively, this information offers a granular view of the socioeconomic landscape within the assessment area.

<b>CENSUS TRACT DATA</b>							
<b>ANAHEIM-SANTA ANA-IRVINE METRO DISTRICT</b>							
<b>Tract Income Level</b>	<b># of Tracts</b>	<b>Tract Population</b>	<b>Number of Households</b>	<b>Number of Housing Units</b>	<b>Number of Owner-Occupied Housing Units</b>	<b>Percent of Owner-Occupied Housing Units</b>	<b>Average 2024 Est. Tract Median Family Income</b>
Low	19	115,855	31,267	32,443	6,422	19.79%	\$55,748.42
Moderate	162	907,277	266,964	278,955	116,537	41.78%	\$84,015.27
Middle	215	1,089,911	369,112	389,755	202,259	51.89%	\$128,285.24
Upper	214	1,069,523	370,770	397,984	269,239	67.65%	\$193,341.21
Unknown	<u>4</u>	<u>4,423</u>	<u>1,888</u>	<u>2,107</u>	<u>771</u>	36.59%	\$0.00
<b>Total</b>	<b>614</b>	<b>3,186,989</b>	<b>1,040,001</b>	<b>1,101,244</b>	<b>595,228</b>	<b>54.05%</b>	
<b>Share of Total</b>							
Low	3.09%	3.64%	3.01%	2.95%	1.08%		
Moderate	26.38%	28.47%	25.67%	25.33%	19.58%		
Middle	35.02%	34.20%	35.49%	35.39%	33.98%		
Upper	34.85%	33.56%	35.65%	36.14%	45.23%		
Unknown	<u>0.65%</u>	<u>0.14%</u>	<u>0.18%</u>	<u>0.19%</u>	<u>0.13%</u>		
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>		
<b>Total for Low-and Moderate-Income Tracts</b>							
Actual							
Percent of							
Total	181	1023132	298231	311398	122959		
	29.48%	32.10%	28.68%	28.28%	20.66%		

**The Combined Assessment Area:**

- Riverside-San Bernardino-Ontario Metropolitan Statistical Area
- Anaheim-Santa Ana-Irvine, CA Metro Division

<b>CENSUS TRACT DATA TOTAL ASSESSMENT AREA</b>						
<b>Tract Income Level</b>	<b># of Tracts</b>	<b>Tract Population</b>	<b>Number of Households</b>	<b>Number of Housing Units</b>	<b>Number of Owner-Occupied Housing Units</b>	<b>Percent of Owner-Occupied Housing Units</b>
Low	67	299187	88027	98037	26214	26.74%
Moderate	444	2161606	639370	707195	305715	43.23%
Middle	577	2809896	890627	982350	540352	55.01%
Upper	493	2467874	788308	866603	599298	69.15%
Unknown	<u>17</u>	<u>48265</u>	<u>10172</u>	<u>13501</u>	<u>5682</u>	42.09%
<b>Total</b>	<b>1598</b>	<b>7,786,828</b>	<b>2,416,504</b>	<b>2,667,686</b>	<b>1,477,261</b>	<b>55.38%</b>
<b>Share of Total</b>						
Low	4.19%	3.84%	3.64%	3.67%	1.77%	
Moderate	27.78%	27.76%	26.46%	26.51%	20.69%	
Middle	36.11%	36.09%	36.86%	36.82%	36.58%	
Upper	30.85%	31.69%	32.62%	32.49%	40.57%	
Unknown	<u>1.06%</u>	<u>0.62%</u>	<u>0.42%</u>	<u>0.51%</u>	<u>0.38%</u>	
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	
<b>Total for Low-and Moderate-Income Tracts</b>						
Actual Percent of Total	511	2460793	727397	805232	331929	
	<b>31.98%</b>	<b>31.60%</b>	<b>30.10%</b>	<b>30.18%</b>	<b>22.47%</b>	

# COMMUNITY REINVESTMENT ACT STRATEGIC PLAN

## Community Reinvestment Act Plan

(Board Approved: 12.16.2025)

### I. IDENTIFY THE ASSESSMENT SERVICE AREA(S) ACCORDING TO THE CRA REGULATIONS.

#### a. **Assessment Service Area**

The Board of Directors of Icon Business Bank (the “**Bank**”) recognize their obligation to help meet the credit needs of their community, consistent with the safe and sound banking operations. For the purpose of Community Reinvestment Act (CRA) assessment, the Bank’s Assessment Service Area (ASA) will be the following metropolitan division (MD) and metropolitan statistical areas (MSAs) in California:

- Anaheim-Santa Ana-Irvine, CA MD #11244 (Orange County)
- Riverside-San Bernardino-Ontario, CA MSA #40140 (Riverside and San Bernardino counties)

#### b. **Assessment Service Area Maps**

The maps contained in this section illustrate the Bank’s ASA. The selection of the above MD/MSAs as the Bank’s ASA conforms to the following criteria:

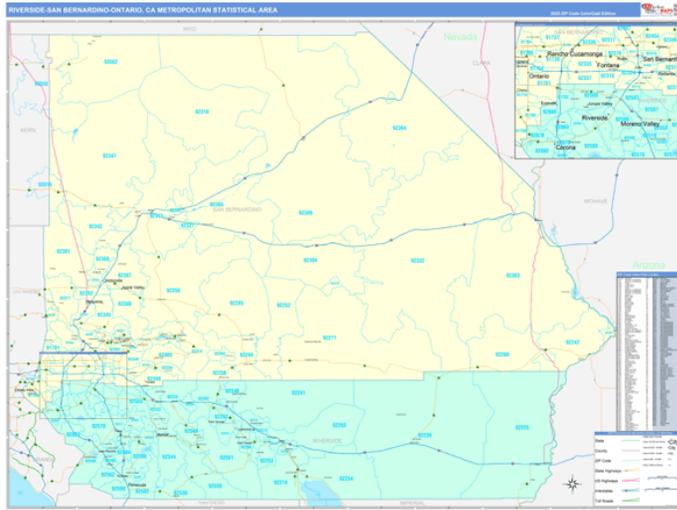
- Consists of one or more contiguous political subdivisions
- Includes the geographies in which the Bank will have its main office (Columbus)
- Consists of whole census tracts
- Does not reflect illegal discrimination
- Does not arbitrarily exclude low- or moderate-income areas
- Does not extend beyond a CMSA boundary or state boundary

The Bank reserves the right to lend outside its ASA. In such cases, these lending activities would not constitute an expansion of the ASA.

#### i. **Riverside-San Bernardino-Ontario Metropolitan Statistical Area**

The Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA), located in Southern California, is a diverse and rapidly growing region that includes Riverside and San Bernardino Counties. It is characterized by a significant small business presence, with industries such as logistics, healthcare, retail, and manufacturing playing vital roles in the local economy. The area’s business landscape is supported by a mix of micro-businesses and larger enterprises, reflecting a dynamic entrepreneurial ecosystem.

Household income levels in the MSA vary widely, with a significant proportion of low- to moderate-income households, particularly in urban and underserved areas. Median household income in the region generally falls below the California state average, creating economic challenges for many residents. However, some suburban communities in the MSA exhibit higher income levels, reflecting a degree of economic stratification. This economic diversity underscores the importance of tailored financial services and credit availability to support both small businesses and households across the income spectrum.



**ii. Anaheim-Santa Ana-Irvine, CA Metro Division**

The Anaheim-Santa Ana-Irvine Metropolitan District, part of Orange County in Southern California, is a thriving economic region with a strong presence of small businesses, particularly in industries such as technology, healthcare, tourism, retail, and professional services. The area benefits from its proximity to major economic hubs and a highly skilled workforce, fostering a vibrant entrepreneurial environment.

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**II. SUMMARIZE THE PERFORMANCE CONTEXT FOR THE INSTITUTION BASED ON THE FACTORS DISCUSSED IN THE CRA REGULATIONS.**

**a. Performance Context**

The Bank expects that it will be evaluated by the FDIC under the “small bank” performance standard, as long as its assets are below the “small bank” asset thresholds set by federal bank regulatory agencies. The primary performance measures are expected to be:

- loan to deposit ratio,
  - percentage of loans in the Assessment Service Area,
  - lending to businesses of different sizes and to borrowers of different income levels,
  - the distribution of lending among geographies of different income levels, and
  - the Bank’s record of actions, if warranted, in response to written complaints about its CRA performance.
- i. Demographic data on median income levels, distribution of household income, nature of housing stock, housing costs, and other relevant data pertaining to a bank’s Assessment Service Area.

The 2024 FFIEC estimated MSA/MD median Family Income for the Riverside-San Bernardino-Ontario Metropolitan Statistical Area and for the Anaheim-Santa Ana-Irvine, CA Metro Division was \$97,500 and \$129,000, respectively. There are a total of 1,598 census tracts within the Bank’s ASA, of which 511 tracts or 31.98% are Low- or Moderate-Income (“LMI”) tracts.

The following tables provide summary demographic, housing and income data for the ASA by census tracts income levels, as provided by the FFIEC.

CENSUS TRACT DATA RIVERSIDE-SAN BERNARDINO-ONTARIO METROPOLITAN STATISTICAL AREA							
Tract Income Level	# of Tracts	Tract Population	Number of Households	Number of Housing Units	Number of Owner-Occupied Housing Units	Percent of Owner-Occupied Housing Units	Average 2024 Est. Tract Median Family Income
Low	48	183,332	56,760	65,594	19,792	30.17%	\$41,051.48
Moderate	282	1,254,329	372,406	428,240	189,178	44.18%	\$80,414.11
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Unknown	<u>13</u>	<u>43,842</u>	<u>8,284</u>	<u>11,394</u>	<u>4,911</u>	43.10%	\$93,901.54
<b>Total</b>	<b>984</b>	<b>4,599,839</b>	<b>1,376,503</b>	<b>1,566,442</b>	<b>882,033</b>	<b>56.31%</b>	
<b>Share of Total</b>							
Low	4.88%	3.99%	4.12%	4.19%	2.24%		
Moderate	28.66%	27.27%	27.05%	27.34%	21.45%		
Middle	36.79%	37.39%	37.89%	37.83%	38.33%		
Upper	28.35%	30.40%	30.33%	29.92%	37.42%		
Unknown	<u>1.32%</u>	<u>0.95%</u>	<u>0.60%</u>	<u>0.73%</u>	<u>0.56%</u>		
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>		
<b>Total for Low-and Moderate-Income Tracts</b>							

Actual Percent of					
Total	330	1437661	429166	493834	208970
	33.54%	31.25%	31.18%	31.53%	23.69%

**CENSUS TRACT DATA**

**ANAHEIM-SANTA ANA-IRVINE METRO DISTRICT**

Tract Income Level	# of Tracts	Tract Population	Number of Households	Number of Housing Units	Number of Owner- Occupied Housing Units	Percent of Owner- Occupied Housing Units	Average 2024 Est. Tract Median Family Income
Low	19	115,855	31,267	32,443	6,422	19.79%	\$55,748.42
Moderate	162	907,277	266,964	278,955	116,537	41.78%	\$84,015.27
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Upper	214	1,069,523	370,770	397,984	269,239	67.65%	\$193,341.21
Unknown	<u>4</u>	<u>4,423</u>	<u>1,888</u>	<u>2,107</u>	<u>771</u>	36.59%	\$0.00
<b>Total</b>	<b>614</b>	<b>3,186,989</b>	<b>1,040,001</b>	<b>1,101,244</b>	<b>595,228</b>	<b>54.05%</b>	

**Share of Total**

Low	3.09%	3.64%	3.01%	2.95%	1.08%
Moderate	26.38%	28.47%	25.67%	25.33%	19.58%
Middle	35.02%	34.20%	35.49%	35.39%	33.98%
Upper	34.85%	33.56%	35.65%	36.14%	45.23%
Unknown	<u>0.65%</u>	<u>0.14%</u>	<u>0.18%</u>	<u>0.19%</u>	<u>0.13%</u>
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>

**Total for Low-and Moderate-Income Tracts**

Actual Percent of					
Total	181	1023132	298231	311398	122959
	29.48%	32.10%	28.68%	28.28%	20.66%

**CENSUS TRACT DATA  
TOTAL ASSESSMENT SERVICE AREA**

Tract Income Level	# of Tracts	Tract Population	Number of Households	Number of Housing Units	Number of Owner- Occupied Housing Units	Percent of Owner- Occupied Housing Units
Low	67	299187	88027	98037	26214	26.74%
Moderate	444	2161606	639370	707195	305715	43.23%
Middle	577	2809896	890627	982350	540352	55.01%
Upper	493	2467874	788308	866603	599298	69.15%
Unknown	<u>17</u>	<u>48265</u>	<u>10172</u>	<u>13501</u>	<u>5682</u>	42.09%
<b>Total</b>	<b>1598</b>	<b>7,786,828</b>	<b>2,416,504</b>	<b>2,667,686</b>	<b>1,477,261</b>	<b>55.38%</b>

**Share of Total**

Low	4.19%	3.84%	3.64%	3.67%	1.77%
Moderate	27.78%	27.76%	26.46%	26.51%	20.69%
Middle	36.11%	36.09%	36.86%	36.82%	36.58%
Upper	30.85%	31.69%	32.62%	32.49%	40.57%
Unknown	<u>1.06%</u>	<u>0.62%</u>	<u>0.42%</u>	<u>0.51%</u>	<u>0.38%</u>
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>	<b>100.00%</b>

**Total for Low-and Moderate-Income Tracts**

Actual Percent of Total	511	2460793	727397	805232	331929
	<b>31.98%</b>	<b>31.60%</b>	<b>30.10%</b>	<b>30.18%</b>	<b>22.47%</b>

As seen above, based on FFIEC's MSA/MD data, the three counties representing the Bank's ASA have a combined population of 7.79 million residents. Total population in the LMI tracts is 2.5 million or 31.6% of the ASA's total population, closely corresponding to the LMI census tract distribution.

There are approximately 2.4 million households and 2.7 million housing units in the ASA, with nearly 30.18% of each in the LMI census tracts, a slightly lower percentage than the LMI census tract distribution in the ASA. Close to 55.4% of the total housing units in the ASA are owner-occupied. Owner-occupancy ratio is somewhat lower in the LMI census tracts at 41.2%.

#### **Distribution of household income**

California - Based on US Census data, the 2019 median household income for Orange County was 19% higher than that of California, while the medians for the Riverside and San Bernardino counties were 9% to 16% below the state's median. Below is the distribution of households in the Bank's California ASA among select income brackets. The aggregate of the three counties' household income distribution among those income brackets was relatively similar to the state's breakdown.

	Orange County	Riverside County	San Bernardino County	Aggregate CA Counties	California
Total Households	1,044,280	734,948	644,758	2,423,986	13,157,873
Median HH Income	\$95,934	\$73,260	\$67,903		\$80,440
<b>HH Income brackets:</b>	<b>Percent of Households</b>				
\$0-25K	12%	16%	16%	14%	15%
\$25-50K	14%	18%	21%	17%	17%
\$50-100K	27%	31%	32%	29%	28%
\$100k+	48%	35%	31%	40%	40%

Source: US Census American Community Survey – 2019

### Business Distribution

The Bank plans to meet its community reinvestment goals primarily by loans to small businesses with revenues of less than \$1 million, and businesses in the ASA's low- and moderate-income areas.

Overall, there are nearly 686,000 businesses in the Bank's ASA, of which 87% have gross annual revenues of \$1 million or less. In total, 26.7% of the businesses in the Bank's ASA are in the LMI census tracts. The following tables summarize the breakdown of such businesses based on data provided in the CRA evaluation of locally-based community banks.

### ORANGE COUNTY, CA

Distribution of Businesses by Revenue			
≤ \$1,000,000	> \$1,000,000	Unknown	Total
88.3%	5.2%	6.5%	100.0%

Distribution Businesses by Census Tract Income	
Census Tract Type	Small Business %
Low-Income	5.4%
Moderate-Income	19.5%
Middle-Income	35.2%
Upper-Income	39.3%
Unknown	0.7%
<b>Total</b>	<b>100.0%</b>

Source: Dunn & Bradstreet 2020 Data – Total of 329,042 businesses

**RIVERSIDE/SAN BERNARDINO COUNTIES, CA**

<b>Distribution of Businesses by Revenue</b>			
<b>≤ \$1,000,000</b>	<b>&gt; \$1,000,000</b>	<b>Unknown</b>	<b>Total</b>
85.8%	5.0%	9.2%	100.0%

<b>Distribution Businesses by Census Tract Income</b>	
<b>Census Tract Type</b>	<b>Small Business %</b>
Low-Income	4.6%
Moderate-Income	25.9%
Middle-Income	34.9%
Upper-Income	34.5%
Unknown	0.1%
<b>Total</b>	<b>100.0%</b>

Source: Dunn & Bradstreet 2018 Data – Total of 224,792 businesses

- b. Any information about lending, investment, and service opportunities in the bank's Assessment Service Area(s) maintained by the bank or obtained from community organizations, state, local, and tribal governments, economic development agencies, or other sources;**

The Assessment Service Area has a diverse and growing economy, solid population growth, an abundance of prospective clients, an expanding deposit base and a favorable competitive landscape, providing the bank with ample lending, investment, and service opportunities.

- i. Diverse and growing economy:
  - (a) With an economic gross metropolitan product of more than \$1 trillion in 2020, the LA-Orange County metropolitan area ranks second among the nation's 384 metropolitan economies<sup>1</sup>.
  - (b) The Inland Empire is the fastest-growing economy in Southern California. Inland Empire is no longer a “bedroom community” to Orange and Los Angeles counties as the area offers better opportunity for jobs and homeownership than other Southern California communities.
- ii. Solid population growth:
  - (a) Population in Orange County has increased by 4.8% over the last decade to a total of 3.2 million as of January 2021<sup>2</sup>.
  - (b) Riverside County population has increased by 12.1% over the last decade to a total of 2.5 million as of January 2021<sup>6</sup>.
- iii. Abundance of prospective clients:
  - (a) Number of businesses in Orange County has increased by 27.4% over the last decade to more than 129 thousand as of the third quarter of 2020<sup>3</sup>.

<sup>1</sup> Source: U.S. Metro Economies 2020 report prepared for the U.S. Conference of Mayors

<sup>2</sup> Source: California Department of Finance

<sup>3</sup> Source: California Employment Development Department

- (b) The number of businesses in Riverside County has increased by 49.3% over the last decade to more than 71 thousand as of the third quarter of 2020.
  
- iv. Expanding deposit base<sup>4</sup>:
  - (a) Orange County's deposits have more than doubled, growing from \$74.2 billion in 2010 to \$153.6 billion in 2020.
  - (b) Total deposits in Riverside County have increased by 68% over the last decade, from \$20.3 billion in 2010 to \$34.1 billion in 2020.
  
- v. Attractive competitive opportunity due to continued banking industry consolidation:
  - (a) Over the last decade, mergers and acquisitions have resulted in a 32% reduction in the number of Orange County-based banks from a total of 25 at the end of 2010 to 17 currently.
  - (b) Large commercial banks continue to dominate the Orange County's deposit market share with the top five institutions holding 59% of total deposits in the county. This concentration provides an opportunity for a locally-based service-oriented bank to capture market share.
  - (c) The consolidation trend is even more pronounced in Riverside County with a 92% drop in the number of local banks from a total of 12 in 2007, to only 1 currently.

The Board of Directors are committed to establishing a bank that supports the needs of the local business community and fosters economic growth. Under the Board's direction, the Bank's management will develop, implement, and evaluate ways to meet the credit needs of the community, including the provision of banking services to LMI neighborhoods within the Bank's ASA. The Bank will provide financing to small businesses, to minority-owned and women-owned businesses, as well as to viable projects that support non-profit and civic organizations.

The Bank's directors and officers have significant ties to the community, especially through involvement with non-profit and other community organizations. The Bank's senior management will participate with organizations that focus on the needs of the community, notably the small business community, within the Bank's market area. Through this involvement, senior management will assess various means of meeting the community's need for credit and banking services.

**c. The bank's product offerings and business strategy as determined from data provided by the bank;**

As a commercial bank, the Bank will be focused on providing a wide range of traditional banking products and services including loans, deposits, treasury and cash management products and services to small and mid-sized businesses, business owners, professionals, and commercial real estate owners and investors, primarily in Orange and Riverside/San Bernardino counties in California. The Bank also plans to serve the banking needs of the consumers in the markets it serves.

In addition to products and services described in the "Marketing Plan (Product and Services)" section of the Confidential Business Plan, the Bank may offer reduced fee small business loans

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<sup>4</sup> Source: Federal Deposit Insurance Corporation

and lines of credit, analyzed small business checking accounts, lower cost letters of credit to support trade activities and other products designed to assist small business customers. Loans will be available to qualified borrowers without regard to age, sex, race, national origin of the owner.

The Bank will seek to achieve its community reinvestment goals through extending loans to businesses with gross annual revenue of less than or equal to \$1 million; loans to businesses and individuals in the LMI Census tracts; loans to minority-owned and women-owned businesses; loans on multi-family properties within the LMI census tracts; and viable projects for non-profit and charitable organizations.

Although initially the Bank will not be examined as an “intermediate small bank” and will therefore not be subject to the community development test, the Bank will still focus on community development loans. The Bank may participate in community development loans originated by larger institution if such loans benefit the neighborhoods within the Bank’s local community. The Bank may also consider originating or participating in the financing of local government and government agency-sponsored programs to assist the needs of low- and moderate-income sectors of the County. The Bank will participate in the SBA program by originating SBA 504 loans which would be considered community development loans. All community development loans will be made in conformance with the Bank’s underwriting standards.

- d. Institutional capacity and constraints, including the size and financial condition of the bank, the economic climate (national, regional, and local), safety and soundness limitations, and any other factors that significantly affect the bank’s ability to provide lending, investments, or services in its Assessment Service Area(s);**

The Bank’s ability to provide lending, investments, or services in its ASA could be impacted by many factors, including its future financial condition and size, resource constraints, legal impediments, and local economic conditions that could affect the demand and supply of credit. In general, however, the current strong and growing economy of the Bank’s ASA, growth in the ASA’s population and businesses, and reduction in the number of local banks present a favorable environment for the establishment of a bank dedicated to meeting the banking needs of small businesses in the local community.

The Bank’s capitalization of \$25 million is deemed sufficient for meeting the banking needs of its target customers and provides an adequate cushion against potential future impediments to the Bank’s ability to serve its ASA.

Please refer to the “Economic Component” section of the Confidential Business Plan for more detailed information on the economic climate.

- e. The bank’s past performance and the performance of similarly situated lenders;**
- f. The bank’s public file, as described in § 345.43, and any written comments about the bank’s CRA performance submitted to the bank or the FDIC; and**
- g. Any information deemed relevant by the FDIC.**

III. **SUMMARIZE THE CREDIT NEEDS OF THE INSTITUTION'S ASSESSMENT SERVICE AREA(S).**

a. **Credit Needs**

The credit needs of the Bank's ASA include loans to small businesses and to minority-owned and women-owned businesses lacking access to capital; loans to businesses seeking to expand their current operations, add to inventories, and finance their real estate needs; affordable housing loans, especially those in the LMI areas of the County; and financial education for small business owners.

The Bank's operating strategy is to offer banking services to individuals, small and medium-sized businesses, business professionals, as well as real estate developers. The Bank's directors and management are involved with organizations that focus on the needs of the community, notably those of small businesses within the Bank's market area. Through these associations, the officers and directors have developed a keen insight and understanding as to the credit and business advisory needs of small business owners. The management team plans to implement a business strategy of fostering the success of small business clients through the provision of relevant banking products and services, as well as access to business advice.

Directors and senior officers will be encouraged to meet with such organizations as merchants' associations, religious organizations, government officials, neighborhood organizations, cooperatives, housing authorities, civil rights, consumer and minority organizations, and other similar organizations. Meeting with such local organizations will allow Bank management to communicate with local officials and be informed of credit and banking gaps within the local community.

On an ongoing basis, the Bank's management and Board of Directors will monitor and assess the effectiveness of the Bank's lending programs in meeting the credit needs of the local community. As required by banking regulations, the Bank will examine the economic composition and credit needs of the local community. This research will allow the Bank to meet the community credit needs consistent with safe and sound banking practices.

To ensure that the Bank meets its responsibility to the community, management will report to the Board of Directors on CRA issues. These reports will identify efforts taken by management to ascertain and meet the credit needs of the community and review public comments received about the availability of credit pursuant to the Community Reinvestment Act statement. When signed public comments are received about the availability of credit or about the CRA statement, the Board will encourage management to review and respond.

IV. **IDENTIFY THE CRA EVALUATION TEST UNDER WHICH THE INSTITUTION PROPOSES TO BE ASSESSED.**

a. **CRA Evaluation Test**

For CRA purposes, the Bank anticipates that it will be evaluated under the "small bank" performance standards, as described under 12 CFR, Section 345, notably 345.26 (a), "small bank" performance standards. Accordingly, the Bank will be evaluated by the FDIC, pursuant to its CRA performance relative to the following criteria:

- i. 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;

- ii. The percentage of loans and other lending-related activities located in the Bank's Assessment Service Area;
- iii. The Bank'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;
- iv. The distribution of lending among geographies of different income levels; and
- v. 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 Service Area.

V. **DISCUSS THE INSTITUTION'S PROGRAMS, PRODUCTS, AND ACTIVITIES THAT WILL HELP MEET THE EXISTING OR ANTICIPATED NEEDS OF ITS COMMUNITY(IES) UNDER THE APPLICABLE CRITERIA OF THE CRA REGULATION, INCLUDING THE NEEDS OF LOW- AND MODERATE-INCOME GEOGRAPHIES AND INDIVIDUALS.**

a. **CRA Programs**

The directors of the Bank are committed to the establishment of a Bank that meets the banking needs of the business community and fosters the economic development of the community. Management has many years of banking experience and knows the importance of supporting banking needs throughout the community, especially low- and moderate-income areas. Under the guidance of the CEO, Chief Credit Officer, the Chief Risk/Operations Officer and Chief Financial Officer, the Bank will develop a CRA program to ensure that its CRA performance is rated as at least "Satisfactory" by the regulators.

The Bank's CRA program will primarily consist of lending to businesses with less than \$1 million in revenue in line with the percentage of such businesses with the ASA, serving the banking needs of businesses and providing multi-family loans within the LMI census tracts in line with the distribution of businesses and multi-family housing units in those census tracts, and providing financing to woman- and minority-owned businesses. The Bank may also participate in community development loans that have been originated by a larger institution, such as loans to address affordable housing needs, if such loans benefit the LMI neighborhoods in the Bank's ASA. If feasible, the Bank will evaluate the extension of loans to businesses that qualify for equity or debt issued by Minority Enterprise Small Business Investment Corporations.

Although not required as part of the "small bank" CRA requirement, the Bank may also engage in qualified community development activities such as making qualifying investments and making qualifying loans, while applying safe and sound lending practices. The Bank may invest into a Community Development Corporation ("CDC") that conducts lending activities located in the Bank's Assessment Service Area. In such cases, the Bank will ensure that funds invested into a CDC are directed or used specifically to assist the needs of low- or moderate-income communities within the ASA.

Management will participate in organizations that focus on the civic, community or social needs in the Bank's market area. Through public outreach, involvement with community and civic activities, and input from the local community, the Bank will seek feedback on its efforts to support the community. The directors will monitor the Bank's programs to ensure that the Bank is meeting the needs of its local community.

**b. CRA Oversight**

The Bank's Enterprise Risk Management ("ERM")/Compliance Committee will be responsible for overseeing CRA compliance, among other duties. As part of the CRA oversight, the ERM/Compliance Committee will review matters related to community development services, establish goals in the provision of CRA-related banking services, assess the effectiveness of programs based upon these CRA goals, and designate a CRA Officer. The Chief Risk/Operations Officer will serve as the CRA Officer and will report directly to the CEO and the Board (Audit Committee) regarding CRA matters. An annual self-assessment of CRA performance will be presented to the full Board.

The CRA review will assess the Bank's lending performance to ensure that the Bank is rated as at least "Satisfactory" by the regulators. To assist in the establishment and evaluation of the Bank's performance under CRA, the Bank will accumulate and analyze information about both the Bank and its Assessment Service Area. Such information includes an overview of the demographics of the Bank's ASA, the lending opportunities within the ASA, and information regarding the product offerings of the Bank.

At least annually, the ERM/Compliance Committee will analyze and submit for full Board review the delineation of the Bank's CRA Assessment Service Area, as well as the Bank's CRA policy. The Committee will assess the Bank's lending activities within its designated ASA based upon such criteria as the Bank's loan-to-deposit ratio; its percentage of lending within the ASA; the geographic distribution of loans in the Assessment Service Area, the Bank's investment in the Assessment Service Area, and its record of responding to written complaints.

The CRA Officer will interface with the FDIC and assemble data for the CRA assessment reports. The CRA Officer will maintain and ensure the integrity of the CRA Public File and CRA Public Notice. The CRA Officer will submit to the ERM/Compliance Committee any recommendations for staff and Board training related to CRA and associated issues.

All Bank personnel are expected to know that the public may view and/or receive copies of all materials contained in the Public File maintained by the Bank. Additionally, the public is entitled to view and/or receive copies of various other materials contained in the more extensive Public File maintained by the CRA Officer.

Following is the Bank's Community Reinvestment Act Notice:

**COMMUNITY REINVESTMENT ACT NOTICE**

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

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

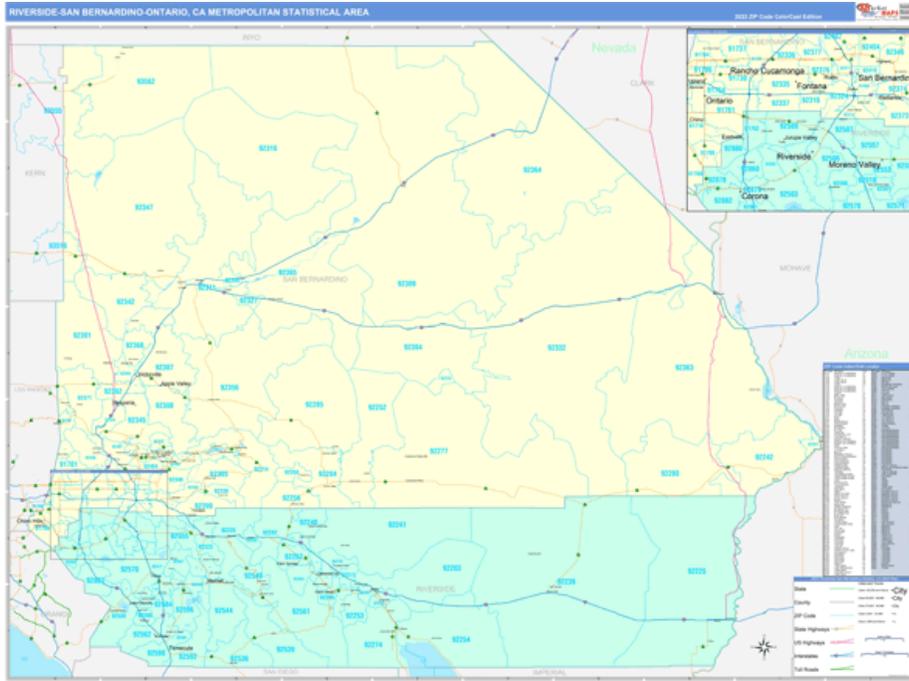
At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, San Francisco Regional Office, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco, California 94105.

You may send written comments about our performance in helping to meet community credit needs to Chief Executive Officer, Icon Bank, [Address TBD], and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC.

Icon Business Bank

Riverside-San Bernardino-Ontario, CA MSA #40140 (Riverside and San Bernardino counties)



Anaheim-Santa Ana-Irvine, CA MD #11244 (Orange County)





## EXHIBIT A

**Public disclosure portion of the Community Reinvestment Act Performance Evaluation of Icon Business Bank, dated September 29, 2025, by the Federal Deposit Insurance Corporation, Division of Depositor and Consumer Protection, San Francisco Regional Office.**

[SEE ATTACHED]



## EXHIBIT B

# INFORMATION BY CENSUS TRACT FOR THE RIVERSIDE – SAN BERNARDINO-ONTARIO, CA METROPOLITAN STATISTICAL AREA

[SEE ATTACHED]



## EXHIBIT C

# INFORMATION BY CENSUS TRACT FOR THE ANAHEIM – SANTA ANA - IRVINE, CA METROPOLITAN DISTRICT AREA