



Community Reinvestment Act

CRA Public File

April 1, 2025

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.

Quarter Ended	Loan to Deposit Ratio ⁽¹⁾
September 30, 2023	28.30% ⁽²⁾
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%
<p>(1) The Loan to The Loan-to-Deposit Ratio is calculated by dividing the institution's net loans and leases by its total deposits.</p> <p>(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.</p>	

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.

A copy of Icon Business Bank's most recent CRA Performance Evaluation follows this page and is made available as part of our ongoing commitment to transparency and community engagement.

CRA Performance Evaluation

As of this date, Icon Business Bank has not yet received its most recent CRA Performance Evaluation from its regulatory agency.

In accordance with Community Reinvestment Act (CRA) regulations, once the public section of the CRA Performance Evaluation is received, Icon Business Bank will include it in this public file within 30 business days.

We remain committed to transparency and compliance and will update this section as soon as the evaluation becomes available.

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

Riverside Branch	
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

Orange County Branch	
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

Riverside Headquarters	
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

Riverside Branch	
Opening Date:	<i>August 22, 2023</i>
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

Las Vegas Branch	
Opening Date:	<i>April 2, 2024</i>
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

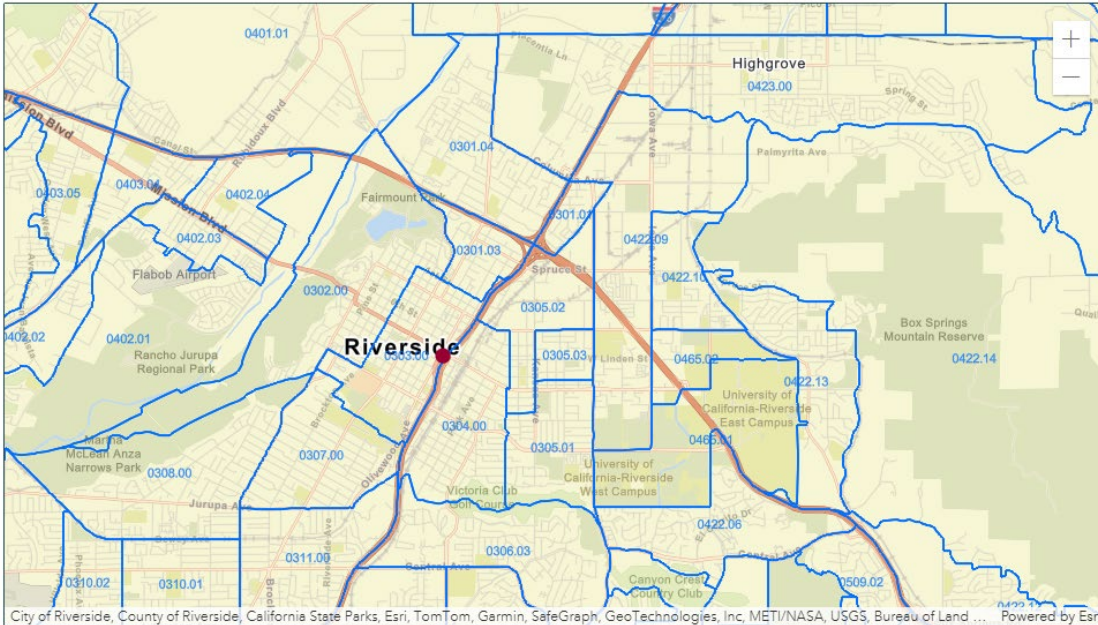
Orange County Branch	
Opening Date:	<i>March 3, 2025</i>
Address:	3 Hutton Centre Drive Suite 150 Santa Ana, California 92707 Orange County
Hours of Operation:	Monday through Friday: 9:00 a.m. to 4:00 p.m. Saturday and Sunday: Closed

BRANCH CLOSURES

Las Vegas Branch	
Closing Date:	<i>December 27, 2024</i>
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

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
- Consumer 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 Account Miscellaneous Fees and Charges

FEES AND CHARGES. The following fees and charges may be assessed against your account:	
ITEM DESCRIPTION	
ACCOUNT RELATED FEES	FEE AMOUNT
NSF Item Paid or Returned - Per item created by check, in-person withdrawal, or other electronic means. (Maximum per day \$300.00)	\$35.00
Chargeback/Returned Deposited Item "Per Check or ACH"	\$15.00
Redeposited Return Item "Per Check"	\$10.00
Stop Payment Order "Per Item"	\$30.00
Stop Payment Order - Online "Per Item"	\$20.00
Early Account Closure (First 90 days) per account	\$15.00
Copy of Check from image "each"	\$5.00
Domestic Incoming/Outgoing Collections "per item"	\$35.00
Foreign Incoming/Outgoing Collections "per item"	\$50.00
Check Printing fees vary by style of check ordered and quantity.	Varies
SERVICE RELATED FEES	
Cashier's Check "each"	\$10.00
Counter Checks/Temporary Checks "each"	\$2.00
Non Customer Check Cashing Fee "each"	\$10.00
Telephone Transfer "each"	\$5.00
Photocopies/Statements/Check Images (per page)	\$1.00
Statement Copy "per statement, per month"	\$5.00
Hold Statement "per statement, per month"	\$10.00
Duplicate Statements "per statement"	\$5.00
Special Services (such as research or account balancing) "per hour"	\$50 per hour (min. 1 hour)
Signature/Endorsement Guarantee "per item"	\$5.00
Legal Process and Attachments "Per Occurrence"	\$125.00
Check Images CD Rom Set Up	\$50.00
Check Images CD Rom Monthly Maintenance	\$25.00
Notary (per signature)	\$15.00
Verification of Deposit (VOD)	\$20.00
WIRE TRANSFERS SERVICE FEES	
Incoming Wire Transfer (Domestic) "each"	\$15.00
Incoming Wire Transfer (Foreign) "each"	\$15.00
Outgoing Wire Transfer (Domestic) "each"	\$30.00
Online Outgoing Wire Transfer (Domestic) "each"	\$15.00
Outgoing Wire Transfer (Foreign) "each"	\$40.00
Online Outgoing Wire Transfer (Foreign) "each"	\$20.00
Wire Tracer-Domestic/Intl "each"	\$10.00
Wire Research "Per hour"	\$50.00
DEBIT CARD FEES	
Debit Card Replacement "each"	\$20.00
Expedited Card Delivery (Overnight - FedEx)	At Cost
Rush Card Delivery (2-3 day US Priority Mail)	At Cost
MOBILE BANKING	
Monthly Service Fee	No Charge
ONLINE BANKING	
Monthly Service Fee	No Charge



FEES AND CHARGES. The following fees and charges may be assessed against your account:

ITEM DESCRIPTION

Account Transfers	No Charge
Bill Pay	No Charge
Quicken/QuickBooks	No Charge
External Transfers	No Charge

Personal Deposit Products

ACCOUNT TYPE**	DESCRIPTION AND FEATURES	MINIMUM OPENING DEPOSIT	SERVICE CHARGE	MINIMUM TO AVOID SERVICE CHARGE	INTEREST TIERS (see rate sheet for more details)
PERSONAL DEPOSIT PRODUCTS					
SIMPLE BUSINESS CHECKING	All the essential account features you need to run your business. Our hard- working account offers all the services your business needs, whether you're expanding or just starting out. *Free Online Banking and Bill Pay. *Unlimited Check Writing. *Surcharge Fee Free ATM Withdrawals.	\$1,000	\$15	\$2,500 minimum daily average ledger balance	N/A
ANALYSIS BUSINESS CHECKING	Enjoy all the flexibility of a checking account or multiple checking accounts for your high-volume transaction business and receive earnings credit on balances that can offset monthly fees or pay for services. Businesses with high volumes of account activity and/or that use Treasury Management products & services	\$1,000	\$15	Account Analysis Earnings Credit Allowance can be used to offset the Monthly Maintenance Fee and Cash Management Service Fees.	N/A
BUSINESS MONEY MARKET	Maximize your savings while maintaining access to cash. Our Business Money Market accounts offer flexible, tiered interest rates with the convenience of unlimited checking writing and debit transactions. *Free Online Banking and Bill Pay. *Unlimited Check Writing, Withdrawals & Transfers. *Tiered Interest Rates for Higher Earnings on Higher Balances	\$5,000	\$20	\$5,000 minimum daily average ledger balance	\$0 to \$49,999.99 \$50,000 to \$249,999.99 \$250,000 to \$499,999.99 \$500,000 to \$999,999.99 \$1,000,000+
IOLTA	An interest-bearing account for attorneys that require an Interest on Lawyers Trust Account (IOLTA). With our Interest on Lawyers Trust Account, your short- term client funds can be transferred automatically to a state bar IOLTA program for your convenience. For Attorney Accounts holding funds for clients. Interest paid directly to the state Bar Association.	\$100	N/A	No Minimum Balance Required	Flat Rate (guided by state)

ACCOUNT TYPE**	DESCRIPTION AND FEATURES	MINIMUM OPENING DEPOSIT	SERVICE CHARGE	MINIMUM TO AVOID SERVICE CHARGE	INTEREST TIERS (see rate sheet for more details)
PERSONAL DEPOSIT PRODUCTS					
BUSINESS SAVINGS	Earn interest while maintaining a lower balance requirement. Keep money apart from main operating account with easy access to your funds. *Free Online Banking and Bill Pay. *Unlimited Withdrawals & Transfers.	\$1,000	\$5	\$1,000 minimum daily average ledger balance	Flat Rate
BUSINESS CD	Lock in higher interest rates than standard savings accounts with flexible terms so you can grow your savings in your preferred timeframe. You'll earn a fixed interest rate to help your business reach its longer-term financial goals. Choose flexible terms ranging from 30 days to 5 years. *Tiered Interest Rates for Higher Earnings on Higher Balances	\$10,000	N/A	N/A	\$10,000 to \$249,999 \$250,000+
PERSONAL CHECKING	Enjoy a basic checking account with premium benefits and must- have features of no monthly service charge, surcharge fee free atm withdrawals and more. Our checking account is built to make banking more simple and secure. *Free Online Banking and Bill Pay. *Unlimited Check Writing. *No Overdraft Fees for Overdrawn balances less than \$25. *Surcharge Fee Free ATM Withdrawals.	\$25	N/A	No Minimum Balance Required	N/A
PERSONAL MONEY MARKET	Earn higher yields on higher balances with a money market account that offers competitive interest rates while enjoying unlimited check- writing capabilities. Our Money Market account is a smart way to add flexibility to your savings strategy *Free Online Banking and Bill Pay. *Unlimited Check Writing, Withdrawals & Transfers.	\$2,500	\$20	\$2,500 minimum daily average ledger balance	\$0 to \$49,999.99 \$50,000 to \$249,999.99 \$250,000 to \$499,999.99 \$500,000 to \$999,999.99 \$1,000,000+
PERSONAL SAVINGS	Our savings account is a great way to save for the future. Watch your money grow with competitive interest rates. Stay in control of your finances with unlimited access to your money without a minimum balance requirement and monthly service charge. *Free Online Banking and Bill Pay. *Unlimited Withdrawals & Transfers. *No Debit Cards.	\$100	N/A	No Minimum Balance Required	Flat Rate

ACCOUNT TYPE**	DESCRIPTION AND FEATURES	MINIMUM OPENING DEPOSIT	SERVICE CHARGE	MINIMUM TO AVOID SERVICE CHARGE	INTEREST TIERS (see rate sheet for more details)
PERSONAL DEPOSIT PRODUCTS					
MY SAVER ACCOUNT (MINOR SAVINGS)	<p>Guiding your child to build good money habits is a great way to start them on the road to financial success. Your child can gain real-world money management experiences as the primary account holder of a My Saver Savings account. Savings Account Free transfers from other accounts. For ages 17 and younger. Account will be automatically converted to a standard savings account when minor turns 18.</p> <p>*Free Online Banking. *Unlimited Withdrawals & Transfers.</p>	\$5	N/A	No Minimum Balance Required	Flat Rate
PERSONAL CD	<p>Feel the confidence of knowing that your money is earning you a fixed, guaranteed return. Our CDs will give you an interest on the amount saved at a fixed rate with flexible terms ranging from 30 days to 5 years.</p> <p>*Tiered Interest Rates for Higher Earnings on Higher Balances See Disclosure for Terms and Penalties</p>	\$10,000	N/A	N/A	\$10,000 to \$249,999 \$250,000+

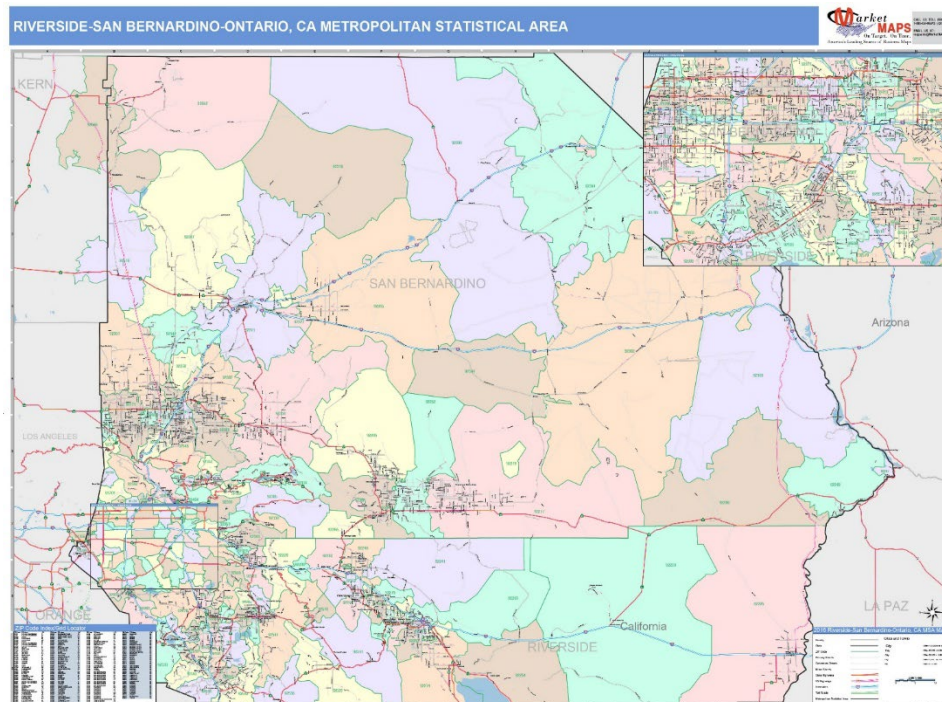
**For specific details regarding all accounts, please ask for the Bank's Personal Account Products Disclosures.

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	13	43,842	8,284	11,394	4,911	43.10%	\$93,901.54
Total	984	4,599,839	1,376,503	1,566,442	882,033	56.31%	
Share of Total							
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>		
Total	100.00%	100.00%	100.00%	100.00%	100.00%		
Total for Low-and Moderate-Income Tracts							
Actual							
Percent of							
Total	330	1437661	429166	493834	208970		
	33.54%	31.25%	31.18%	31.53%	23.69%		

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.



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
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
Total	614	3,186,989	1,040,001	1,101,244	595,228	54.05%	
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>		
Total	100.00%	100.00%	100.00%	100.00%	100.00%		
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%		

The Combined Assessment Area:

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

CENSUS TRACT DATA TOTAL ASSESSMENT 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%
Total	1598	7,786,828	2,416,504	2,667,686	1,477,261	55.38%
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>	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	
Total for Low-and Moderate-Income Tracts						
Actual Percent of Total	511	2460793	727397	805232	331929	
	31.98%	31.60%	30.10%	30.18%	22.47%	

COMMUNITY REINVESTMENT ACT STRATEGIC PLAN

Community Reinvestment Act Plan

(Board Approved: 12.17.2024)

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:

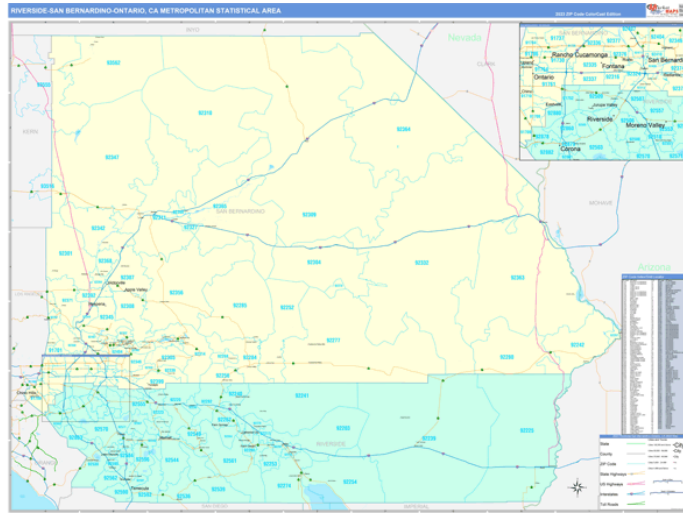
- Consists of one or more contiguous political subdivisions
- Includes the geographies in which the Bank will have its main office (Columbus)
- Consists of whole census tracts
- Does not reflect illegal discrimination
- Does not arbitrarily exclude low- or moderate-income areas
- Does not extend beyond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

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.



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
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
Total	984	4,599,839	1,376,503	1,566,442	882,033	56.31%	
Share of Total							
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>		
Total	100.00%	100.00%	100.00%	100.00%	100.00%		
Total for Low-and Moderate-Income Tracts							
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
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
Total	614	3,186,989	1,040,001	1,101,244	595,228	54.05%	
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>		
Total	100.00%	100.00%	100.00%	100.00%	100.00%		
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%
Total	1598	7,786,828	2,416,504	2,667,686	1,477,261	55.38%
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>	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	
Total for Low-and Moderate-Income Tracts						
Actual	511	2460793	727397	805232	331929	
Percent of Total	31.98%	31.60%	30.10%	30.18%	22.47%	

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
HH Income brackets:	Percent of Households				
\$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%
Total	100.0%

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

RIVERSIDE/SAN BERNARDINO COUNTIES, CA

Distribution of Businesses by Revenue			
≤ \$1,000,000	> \$1,000,000	Unknown	Total
85.8%	5.0%	9.2%	100.0%

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

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 economies¹.
 - (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 2021².
 - (b) Riverside County population has increased by 12.1% over the last decade to a total of 2.5 million as of January 2021⁶.
- 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 2020³.

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

² Source: California Department of Finance

³ 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 base⁴:
 - (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

⁴ 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.

The Bank also intends to purchase portfolios of indirect auto loans. These loans will be included in the overall assessment of CRA performance. Although the identified partner for these loans does lend in several areas, including California, Arizona and Utah, the Bank intends to purchase loans made within its identified Assessment Service Areas as long as they meet the credit criteria.

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.

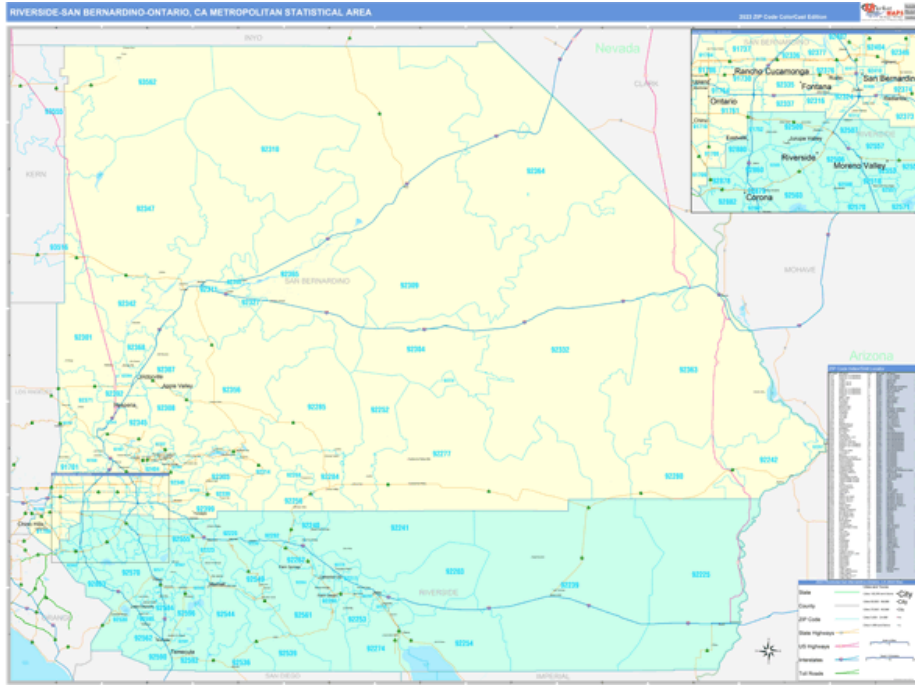
At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, San Francisco Regional Office, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco,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

