



**COMMUNITY
REINVESTMENT ACT
(CRA)**

PUBLIC FILE



Written Comments from the Public

During calendar years 2003 through 2023, there have been no written comments received from the public that specifically relate to the Community Reinvestment Act (CRA) or to the Bank's performance in helping meet the needs of its communities.

Year-to-date 2024, there has been no written comments received from the public that specifically relate to the Community Reinvestment Act (CRA) or to the Bank's performance in helping meet the needs of its communities.



CRA Performance Evaluation

The Bank is periodically evaluated by its regulatory agency, the Federal Deposit Insurance Corporation (FDIC). Since the time the Bank opened for business on January 21, 2003, the Bank has had a CRA Performance Evaluation on the following dates:

- January 31, 2005
- January 19, 2010
- August 11, 2015
- August 20, 2018
- June 28, 2021

See attached for the most recent report.

PUBLIC DISCLOSURE

June 28, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sanibel Captiva Community Bank
Certificate Number: 57425

2406 Periwinkle Way
Sanibel, Florida 33957

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

10 Tenth Street, Northeast, Suite 800
Atlanta, Georgia 30309-3849

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

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**. An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area's credit needs.
- The bank originated a majority of its loans within the assessment area.
- The geographic distribution of the loans reflects a reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects a reasonable penetration among businesses of different sizes and individuals of different income levels.
- The institution has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- The bank's Community Development Test performance demonstrates an adequate responsiveness to the community development needs of the assessment area. The bank met these needs through community development loans, qualified donations, and community development services.

DESCRIPTION OF INSTITUTION

Sanibel Captiva Community Bank (SCCB) is headquartered in Sanibel, Florida. The bank received a Satisfactory rating at the previous FDIC CRA Performance Evaluation, dated August 20, 2018, based on Interagency Intermediate Small Institution Examination Procedures.

SCCB operates eight full-service branches in Lee County, Florida. Since the previous CRA evaluation, the bank has not closed any offices, and no mergers or acquisition activities have occurred. However, in July 2020, the bank opened a branch in Fort Myers, Florida, located in a middle-income census tract. In February 2021, the bank relocated its main office within the same census tract.

SCCB offers a variety of products and services to meet the needs of its communities. Commercial credit products offered include real estate, construction, equipment, operating lines of credit, letters of credit, and working capital loans. The bank also offers loans through the U.S. Small Business Administration (SBA), such as 7(a) Paycheck Protection Program (PPP) loans. The bank originated 560 loans through the PPP totaling \$47.2 million in 2020 and 332 loans totaling \$20.7 million in 2021. The SBA guarantees these loans under the Coronavirus Aid, Relief, and Economic Security Act, commonly known as the CARES Act. The loans serve to retain jobs that would otherwise be lost due to business closures because of the COVID-19 emergency.

Consumer real estate loan products offered include a variety of fixed- and adjustable-rate loan products. Home mortgage loans products include adjustable-rate purchase, refinance, and improvement loans, as well as home equity lines of credit. SCCB uses secondary market lenders to originate long-term, fixed-rate home mortgage loans. Since the previous evaluation, the bank sold 700 loans, totaling \$212.8 million, in the secondary market. Consumer credit products offered include unsecured, automobile, boat, and deposit-secured loans.

Deposit services offered include checking, savings, money market, certificates of deposit, and individual retirement accounts. Other services include internet, mobile, and telephone banking, and automated teller machines (ATMs) through the STAR, CIRRUS, PLUS, and Presto! Networks.

As of the March 31, 2021 Consolidated Reports of Condition and Income (Call Report), SCCB had total assets of \$745.0 million, with loans totaling \$486.6 million, or 65.3 percent of total assets, and total securities of \$8.9 million. Since the previous evaluation, SCCB’s total loans increased by 33.0 percent. Examiners did not identify any financial or legal impediments that affect the bank’s ability to meet the assessment area’s credit needs. As shown in the following table, one-to-four family residential real estate represented the largest portion of the loan portfolio at 46.5 percent, followed by commercial real estate and commercial and industrial loans 44.3 percent.

Loan Portfolio Distribution as of 3/31/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	32,056	6.6
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	226,299	46.5
Secured by Multi-family (5 or more) Residential Properties	6,608	1.4
Secured by Non-farm Non-Residential Properties	137,006	28.2
Total Real Estate Loans	401,969	82.6
Commercial and Industrial Loans	78,334	16.1
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer	7,937	1.6
Obligations of States and Political Subdivisions in the United States	0	0.0
Other Loans	0	0.0
Lease Financing Receivables (net of unearned income)	0	0.0
Less: Unearned Income	(1,645)	(0.3)
Total Loans	486,595	100.0
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0%.</i>		

DESCRIPTION OF ASSESSMENT AREA

During the evaluation period, SCCB expanded its assessment area. Specifically, SCCB continues to maintain one assessment area; however, it now includes all census tracts within Lee County, Florida. Lee County constitutes the Cape Coral-Fort Myers Metropolitan Statistical Area (MSA). Examiners conducted a full-scope review of the bank’s CRA performance in its assessment area.

ECONOMIC AND DEMOGRAPHIC DATA

According to the 2015 American Community Survey (ACS) Census data, Lee County consists of 167 census tracts of which 7 are low-, 42 are moderate-, 60 are middle-, 56 are upper-income, and 2

with no income designation. The table below details demographic characteristics of the assessment area based on the 2015 ACS data and the 2020 D&B data.

Demographic Information of the Lee County Assessment Area (Cape Coral-Fort Myers, FL MSA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	4.2	25.1	35.9	33.5	1.2
Population by Geography	663,675	4.7	27.1	42.3	25.9	0.0
Housing Units by Geography	374,333	3.5	21.3	40.9	34.4	0.0
Owner-Occupied Units by Geography	174,162	2.1	18.6	44.2	35.1	0.0
Occupied Rental Units by Geography	78,125	8.5	32.9	38.0	20.5	0.0
Vacant Units by Geography	122,046	2.3	17.6	38.0	42.1	0.0
Businesses by Geography	98,649	2.7	22.6	40.1	34.4	0.2
Farms by Geography	2,955	3.2	26.1	46.5	24.3	0.0
Family Distribution by Income Level	165,635	20.7	18.5	19.7	41.1	0.0
Household Distribution by Income	252,287	22.6	17.2	18.8	41.4	0.0
Median Family Income MSA	\$57,627				Median Housing Value	\$192,233
					Median Gross Rent	\$970
					Families Below Poverty Level	11.1%

Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0%. () The NA category consists of geographies (census tracts) that have not been assigned an income classification.*

According to 2020 D&B data, there were 98,649 businesses in the assessment area. The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue (GAR) level. The following reflects GARs for these businesses: 91.8 percent had \$1.0 million or less; 2.7 percent had more than \$1.0 million; and 5.5 percent had unknown revenues. Service industries represent the largest sector of businesses in the assessment area at 37.7 percent; followed by non-classifiable establishments at 22.8 percent; and retail trade at 10.0 percent. Major employers in the assessment area include Lee Memorial Health Systems, Publix Super Markets, Inc., Florida Gulf Coast University, Wal-Mart, and Hope Hospice.

Data obtained from the U.S. Bureau of Labor Statistics indicates the unemployment rate changed during the evaluation period. As illustrated in the table below, the rate in the U.S., Florida, and Lee County decreased in 2019; however, they increased in 2020. Lee County’s unemployment rate was below the state and national averages in 2018 and 2020, but above the state average in 2019.

Unemployment Rates			
Area	2018	2019	2020
	%	%	%
Lee County	3.5	3.3	7.3
State of Florida	3.6	3.1	7.7
National Average	3.9	3.7	8.1

Source: Bureau of Labor Statistics

Examiners used the Federal Financial Institutions Examination Council (FFIEC)-updated median family income (MFI) figures to analyze home mortgage lending under the Borrower Profile criterion. The following table on the next page reflects the low-, moderate-, middle-, and upper-income MFI categories in the MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Cape Coral-Fort Myers, FL MSA Median Family Income (15980)				
2019 (\$67,100)	<\$33,550	\$33,550 to <\$53,680	\$53,680 to <\$80,520	≥\$80,520
2020 (\$68,700)	<\$34,350	\$34,350 to <\$54,960	\$54,960 to <\$82,440	≥\$82,440
<i>Source: FFIEC</i>				

COMPETITION

SCCB operates in a competitive environment. In addition to competing with large national and regional banks, the bank also competes with local community banks, credit unions, and finance companies. Internet banking further increases the level of competition. According to the FDIC Deposit Market Share data, as of June 30, 2020, 30 financial institutions operated 184 offices within the assessment area. The top three banks by deposit market share were Truist Bank; Wells Fargo Bank, N.A.; and Bank of America, N.A. These three banks accounted for 47.0 percent of the deposit market share. Of these institutions, SCCB ranked 10th, with a 2.6 percent market share.

There is a high level of competition for home mortgage loans among lenders. In 2019, for the assessment area, 850 lenders reported 34,056 originated or purchased home mortgage loans. The top five home mortgage originators (by number) were Wells Fargo Bank, N.A.; Quicken Loans; Suncoast Credit Union; United Shore Financial Service; and PennyMac Loan Services, LLC. Collectively, these leading institutions accounted for 25.6 percent of the total market share. Of these institutions, SCCB ranked 51st in home mortgage lending with a market share of 0.4 percent.

COMMUNITY CONTACT(S)

Examiners rely on contacts with community organizations to gain insight regarding the credit needs and economic conditions of a bank's assessment area(s). Individuals interviewed provide information based upon their knowledge and expertise in the housing, business, or economic sectors. During this evaluation, examiners conducted a contact with an organization that serves the assessment area. The contact noted the primary need is affordable housing. Also, the contact stated the coronavirus outbreak continues to impact the economics within the community. Assistance could be provided by institutions by offering affordable housing options for low- and moderate-income families. This can be accomplished through financing of affordable housing projects as well as grants to subsidize housing costs. Additionally, the contact stated that the lack of financial literacy is an issue and that banks can participate by providing technical assistance and financial literacy courses for low- and moderate-income individuals and families.

CREDIT AND COMMUNITY DEVELOPMENT NEEDS AND OPPORTUNITIES

Based on demographic information and economic data, examiners identified certain credit and community development needs and opportunities within the assessment area. The relatively high number of low- and moderate-income families in comparison to home prices, indicates a strong need for affordable housing. Thus, government-guaranteed home loan programs with more flexible underwriting criteria may be needed. Second, small business loans are needed, as there are a significant percentage of businesses with GARs of \$1.0 million or less and a large number of businesses with 4 or fewer employees at 64.7 percent.

SCOPE OF EVALUATION

GENERAL INFORMATION

This evaluation covers the period from the previous evaluation dated August 20, 2018, to the current evaluation. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's CRA performance. As described in the Appendices, these procedures include two tests: Lending and Community Development. A bank must achieve at least a satisfactory rating for each test to obtain an overall satisfactory rating.

ACTIVITIES REVIEWED

For the Lending Test, the CRA regulation requires a review of the lending performance of a bank in its defined assessment area(s) with respect to home mortgage, small business, and small farm loans, if significant. SCCB's major product line is one-to-four family home mortgage loans followed by business loans. This conclusion considered the bank's business strategy, as well as the number and dollar volume of loans originated or purchased during the evaluation period. As of March 31, 2021, no farm loans were outstanding in the bank's loan portfolio. Resultantly, small farm loans are not a significant product line for the bank and were not reviewed during this evaluation.

The Home Mortgage Disclosure Act (HMDA) requires banks meeting asset size and certain location requirements to report home mortgage loan data. SCCB is subject to the data collection and recording provisions of the HMDA. Therefore, all full calendar years of HMDA since the prior evaluation were analyzed for the Lending Test, and the most recent full calendar year with aggregate data were presented in this evaluation. Based on bank records, in 2020, the bank originated 208 home mortgage loans totaling \$94.3 million. In 2019, the bank originated 172 home mortgage loans totaling \$60.0 million. In 2018, the bank originated 231 home mortgage loans totaling \$79.5 million. Aggregate lending data and 2015 ACS data provided a standard of comparison for the HMDA loans reviewed.

Examiners also collected small business data from bank records for loans originated in 2020 to draw conclusions about the bank's Lending Test performance. Based on bank records, the bank originated 820 small business loans totaling \$69.4 million in 2020. Of those, 560 loans totaling \$47.2 million were SBA PPP loans. A sample of 64 small business loans was used to evaluate the bank's lending performance. However, the high volume of SBA PPP loan originations in 2020 was not reflective of the bank's lending during the evaluation period. Therefore, a review was also conducted of the bank's 2019 small business data. In 2019, the bank originated 64 small business loans totaling \$16.2 million. A sample of 37 small business loans was used to evaluate the bank's lending performance. As a CRA non-reporter, aggregate small business lending data is not used for comparison purposes; therefore, examiners compared the bank's 2019 and 2020 small business lending performance to 2019 and 2020 D&B data, respectively.

Although home mortgage loans remain the primary focus of the bank's lending activities, the commercial loan concentration has increased considerably since the previous evaluation. Therefore, more weight was given to the small business loans when determining the conclusions and overall ratings reflected in this evaluation.

For the Lending Test, examiners review the number and dollar volume of a bank’s home mortgage and small business loans. Tables in an evaluation present both the number and dollar volume of loans. However, examiners emphasize performance by number of loans, as the number of loans is a better indicator of the number of individuals and businesses served. For the Community Development Test, examiners drew conclusions based on bank records, documenting community development loans, qualified investments, and community development services performed since the previous evaluation dated August 20, 2018.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

SCCB’s overall lending performance is satisfactory. This rating is based on the following factors: a more than reasonable loan-to-deposit ratio; a majority of the loans were originated inside the assessment area; a reasonable dispersion of the small business loans in low- and moderate-income census tracts; and a reasonable penetration of loans among businesses of different sizes.

Loan-to-Deposit Ratio

The bank’s net loan-to-deposit (NLTD) ratio is more than reasonable given the institution’s size, financial condition, and assessment area’s credit needs. The NLTD ratio for the previous 11 quarters averaged 96.0 percent. This ratio is calculated on a net basis, excluding loan loss reserves and unearned income. Since the previous evaluation, the bank’s NLTD ratio ranged from a high of 106.7 percent on September 30, 2018, to a low of 70.8 percent on March 31, 2021. The NLTD ratio has fluctuated quarter-to-quarter; however, a downward trend has been noted since March 31, 2020. SCCB maintained an average NLTD ratio significantly above the comparable institutions as shown in the table below. Examiners selected the comparable institutions based on asset size, geographic location, and lending focus.

Loan-to-Deposit Ratio Comparison		
Institution	Total Assets \$(000s)	Average NLTD Ratio (%)
Sanibel Captiva Community Bank, Sanibel, Florida	745,001	96.0
Brannen Bank, Inverness, Florida	720,238	56.0
Edison National Bank, Fort Myers, Florida	483,771	48.7

Source: Call Reports

Assessment Area Concentration

Overall, SCCB originated a majority of loans by both number and dollar volume within the assessment area. As illustrated in the following table on the next page, the bank’s performance was slightly better with respect to the small business loans, particularly by dollar amount. This overall performance demonstrates SCCB’s efforts to provide credit services to individuals and businesses located inside the assessment area.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	200	86.6	31	13.4	231	70,320	88.4	9,204	11.6	79,524
2019	137	79.7	35	20.3	172	43,191	72.0	16,828	28.0	60,019
2020	183	88.0	25	12.0	208	79,847	84.7	14,456	15.3	94,303
Small Business										
2019	33	89.2	4	10.8	37	8,081	95.1	415	4.9	8,496
2020	58	90.6	6	9.4	64	4,063	93.5	283	6.5	4,346

Source: Bank Data. Due to rounding, totals may not equal 100.0%.

Geographic Distribution

The geographic distribution of the loans reflects a reasonable dispersion throughout the assessment area. This conclusion is based on a reasonable dispersion of the small business loans.

Home Mortgage Loans

The geographic distribution of the home mortgage loans reflects a poor dispersion throughout the assessment area. In 2019, SCCB's performance in low-income census tracts fell below demographic data. However, lending opportunities in these tracts may be limited given the low percentage of owner-occupied housing units at 2.1 percent; aggregate lending at 1.7 percent supports this conclusion. The bank's performance in 2018 and 2020 was slightly better, at 1.0 percent and 1.1 percent, respectively, but still below comparison data. The bank's 2019 performance in moderate-income census tracts fell well below demographic data as well as aggregate lending. The bank's performance in 2018 was slightly better, at 8.5 percent, but still below comparison data. The following table illustrates the 2019 dispersion of the home mortgage loans by census tract income level.

Geographic Distribution of Home Mortgage Loans (2019)						
Census Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.1	1.7	1	0.7	89	0.2
Moderate	18.6	19.1	11	8.0	4,105	9.5
Middle	44.2	45.4	49	35.8	11,032	25.5
Upper	35.1	33.7	76	55.5	27,965	64.7
Not Available	0.0	0.1	0	0.0	0	0.0
Total	100.0	100.0	137	100.0	43,191	100.0

Source: 2015 ACS Data; Bank HMDA Data; and HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

Small Business Loans

The geographic distribution of the small business loans reflects a reasonable dispersion throughout the assessment area. As illustrated in the table on the next page, in 2019 SCCB did not originate any loans in low-income census tracts. However, lending opportunities in these tracts may be limited given the low percentage of businesses at 2.6 percent. The bank's 2019 performance in moderate-income census tracts also falls below demographic data. In 2020, the bank's performance in low- and moderate-income census tracts exceeded demographic data. The table on the next page illustrates the dispersion of the small business loans by census tract income level.

Geographic Distribution of Small Business Loans (2019/2020)						
Census Tract Income Level	% of Businesses	#	%	\$(000s)	%	
Low						
2019	2.6	0	0.0	0	0.0	
2020	2.7	4	6.9	476	11.7	
Moderate						
2019	22.5	5	15.2	1,210	15.0	
2020	22.6	14	24.1	1,316	32.4	
Middle						
2019	40.1	15	45.5	3,475	43.0	
2020	40.1	9	15.5	459	11.3	
Upper						
2019	34.5	13	39.4	3,396	42.0	
2020	34.4	30	51.7	1,439	35.4	
Not Available						
2019	0.2	0	0.0	0	0.0	
2020	0.2	1	1.7	373	9.2	
Totals						
2019	100.0	33	100.0	8,081	100.0	
2020	100.0	58	100.0	4,063	100.0	
<i>Source: 2015 ACS Data; 2019-2020 D&B Data; and Bank Data. Due to rounding, totals may not equal 100.0%.</i>						

Borrower Profile

The distribution of borrowers reflects a reasonable penetration among individuals of different income levels and businesses of different sizes. This conclusion is based on a reasonable penetration of the small business loans.

Home Mortgage Loans

The distribution of borrowers reflects a poor penetration among individuals of different income levels. In 2019, lending to low- and moderate-income borrowers was below demographic and aggregate data. The bank's low-income performance in 2020 and moderate-income performance in 2018 was better at 2.2 percent and 7.0 percent, respectively, but still below comparison data. When considering a poverty level of 11.1 percent, lending to low-income borrowers is reasonable; however, lending to moderate-income borrowers remains poor. The following table illustrates the dispersion of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level (2019)						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.7	4.5	2	1.5	120	0.3
Moderate	18.5	16.5	6	4.4	567	1.3
Middle	19.7	20.9	11	8.0	2,459	5.7
Upper	41.1	42.5	81	59.1	27,480	63.6
Not Available	0.0	15.6	37	27.0	12,565	29.1
Total	100.0	100.0	137	100.0	43,191	100.0
<i>Source: 2015 ACS Data; Bank HMDA Data; and HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of borrowers reflects a reasonable penetration among businesses of different sizes. As illustrated in the table below, in 2019 and 2020, the bank's percentage of loans to businesses with revenues of \$1.0 million or less was below demographic data. However, the performance is reasonable, as the bank originated almost 75.0 percent of the loans to small businesses in both years. The following table illustrates the distribution of loans by the gross revenue level of businesses.

Distribution of Small Business Loans by Gross Annual Revenue Category (2019/2020)					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	91.1	25	75.8	5,373	66.5
2020	91.8	42	72.4	1,962	48.3
>1,000,000					
2019	3.1	8	24.2	2,708	33.5
2020	2.7	12	20.7	1,910	47.0
Revenue Not Available					
2019	5.8	0	0.0	0	0.0
2020	5.5	4	6.9	191	4.7
Totals					
2019	100.0	33	100.0	8,081	100.0
2020	100.0	58	100.0	4,063	100.0

Source: 2018-2020 D&B Data and Bank Data. Due to rounding, totals may not equal 100.0%

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

SCCB's Community Development Test performance demonstrates an adequate responsiveness to the community development needs of the assessment area. The bank met these needs through community development loans, qualified donations, and community development services.

Community Development Loans

SCCB originated 129 community development loans totaling \$24.6 million during the evaluation period. The dollar amount of the community development loans equates to 5.1 percent of total loans and 3.3 percent of total assets as of March 31, 2021. By number, 96.1 percent supported revitalization or stabilization, 3.1 percent supported affordable housing, and 1.0 percent supported economic development. SCCB's community development lending, by number and dollar amount, has increased since the previous evaluation and exceeds a similarly situated bank. The table on the next page reflects the bank's community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
8/21/2018–12/31/2018	1	1,000	0	0	0	0	0	0	1	1,000
2019	1	406	1	3,800	0	0	1	520	3	4,726
2020	2	1,100	0	0	0	0	70	11,433	72	12,533
1/1/2021–6/28/2021	0	0	0	0	0	0	53	6,331	53	6,331
Totals	4	2,506	1	3,800	0	0	124	18,284	129	24,590

Source: Bank Records

A substantial majority of the bank’s community development loans (94.6 percent by number) were extended through the SBA’s PPP. This temporary program was created through the CARES Act and was intended to provide economic relief to small businesses. The PPP loans sustained small business operations by supporting job retention in low- and moderate-income census tracts. SCCB met the needs of its assessment area through the above-noted community development loans. Therefore, the bank received consideration for 12 other community development loans totaling \$1.7 million that benefitted small businesses outside of the assessment area. The following are examples of the bank’s community development loans in the assessment area.

- In 2018, SCCB extended a loan for \$1.0 million to renovate a 100-unit apartment complex in a moderate-income census tract. The rental rates are priced and targeted to low- and moderate-income individuals.
- In 2019, the bank refinanced a \$1.2 million loan to a substance abuse, mental health, and medical detox treatment facility that primarily serves low- and moderate-income individuals. The facility is located in a moderate-income census tract designated as part of the Fort Myers Redevelopment District.

Qualified Investments

SCCB extend 29 qualified donations totaling \$158.0 thousand dollars during the evaluation period. The institution did not have any qualified investments for consideration. The dollar amount of the qualified donations equates to less than 1.0 percent of total assets and 1.8 percent of total securities as of March 31, 2021. SCCB’s community development donations, by number and dollar amount, has increased since the previous evaluation; however, the activity was lower than a similarly situated bank. The following table illustrates the qualified donation totals by activity purpose during the evaluation period.

Qualified Investments (Donations)										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
8/21/2018–12/31/2018	1	<1	0	0	0	0	0	0	1	<1
2019	2	22	7	10	0	0	0	0	9	32
2020	3	38	10	57	1	1	0	0	14	96
1/1/2021–6/28/2021	2	25	3	4	0	0	0	0	5	29
Total	8	86	20	71	1	1	0	0	29	158

Source: Bank Records

The donations were primarily responsive to the needs of organizations that support community service activities in the assessment area. By number, 69.0 percent of the donations supported community services, 27.6 percent supported affordable housing, and 3.4 percent supported economic development. However, by dollar volume, 54.4 percent supported affordable housing, 44.9 percent supported community services, and less than 1.0 percent supported economic development. SCCB met the needs of its assessment area through the noted donations. Therefore, the bank received consideration for 12 other community development donations totaling \$49.3 thousand that benefitted organizations outside of the assessment area. The following are examples of the bank’s donation activities in the assessment area.

- In 2019 and 2020, SCCB made 8 donations totaling \$7,000 to five schools in the assessment area. All of the schools are “Title 1” schools, where a majority of the schools’ students qualify for federally sponsored free or reduced-cost lunch programs.
- In 2020, the bank provided a \$20,000 donation to a non-profit organization that provides affordable housing to low- and moderate-income families.

Community Development Services

SCCB’s board members and employees participated in 40 community development services during the evaluation period. This performance resulted in the bank providing financial services or technical expertise to 6 organizations. The organizations assist the assessment area by providing affordable housing, essential community services, and supporting economic development. The bank’s service activity was slightly higher than a similarly situated bank and higher than the previous evaluation. The following table illustrates the bank’s community development services by year and purpose. By purpose, 85.0 percent of the activities supported community services, 7.5 percent supported affordable housing, and 7.5 percent supported economic development.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
8/21/2018–12/31/2018	0	0	0	0	0
2019	1	14	1	0	16
2020	1	14	1	0	16
1/1/2021–6/28/2021	1	6	1	0	8
Totals	3	34	3	0	40

Source: Bank Records

SCCB met the needs of the assessment area through the noted community development services. The following are examples of the bank’s community development service activities in this area.

- In all years since the previous evaluation, a bank officer provided financial and technical expertise by participating on the board of an organization that provides affordable housing for low- and moderate-income individuals.
- In all years since the previous evaluation, a bank officer provided financial and technical expertise by participating on the board for a local chamber of commerce. The chamber helps attract, promote, and support small businesses within a Fort Myers Redevelopment District.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

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

Community Development Test

The Community Development Test considers the following criteria:

- (1) The number and amount of community development loans;
- (2) The number and amount of qualified investments;
- (3) The extent to which the bank provides community development services; and
- (4) The bank's responsiveness through such activities to the area's community development needs considering the amount and combination of these activities, along with their qualitative aspects.

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

- Having a primary mission of promoting community development;
- Serving an investment area or target population;

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other

family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages,

boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

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



List of Branches

Location:	Office:	Geography: (Census Tract)
2406 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.04
1037 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6150 Fax: (239) 472-1324	Branch	802.02
15975 McGregor Blvd. Fort Myers, Florida 33908 Tel: (239) 210-7100 Fax: (239) 415-3386	Branch	19.13
7040 Winkler Road Fort Myers, Florida 33919 Tel: (239) 274-7400 Fax: (239) 437-5824	Branch	17.11
7500 College Parkway Fort Myers, Florida 33907 Tel: (239) 274-6200 Fax: (239) 274-6201	Branch	17.08
1533 Hendry Street Suite 101 Fort Myers, FL 33901 Tel: (239) 274-6205 Fax: N/A	Branch	803.00



List of Branches (continued)

Location:	Office:	Geography: (Census Tract)
11691 Gateway Boulevard Suite 101 Fort Myers, Florida 33913 Tel: (239) 274-6210 Fax: (239) 336-5454	Branch	401.36
9311 College Parkway Fort Myers, Florida 33919 Tel: (239) 274-6250 Fax: (239) 336-5484	Branch	17.01



Opened Branches

Location:	Office:	Geography: (Census Tract)	Date Opened:
2406 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.04	01/21/03 06/02/03 (relocation to new site) 02/01/21 (relocation to new site)
1037 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6150 Fax: (239) 472-1324	Branch	802.02	11/08/04 <i>(Temporarily closed due to damages incurred by Hurricane Ian)</i>
15975 McGregor Blvd. Fort Myers, Florida 33908 Tel: (239) 210-7100 Fax: (239) 415-3386	Branch	19.13	10/20/06 07/23/07 (relocation to new site)
7040 Winkler Road Fort Myers, Florida 33919 Tel: (239) 274-7400 Fax: (239) 437-5824	Branch	17.11	01/06/15
7500 College Parkway Fort Myers, Florida 33907 Tel: (239) 274-6200 Fax: (239) 274-6201	Branch	17.08	02/17/16
1533 Hendry Street Suite 101 Fort Myers, Florida 33901 Tel: (239) 274-6205 Fax: (239) NA	Branch	803.00	01/05/17



Opened Branches (continued)

Location:	Office:	Geography: (Census Tract)	Date Opened:
11691 Gateway Boulevard Suite 101 Fort Myers, Florida 33913 Tel: (239) 274-6210 Fax: (239) 336-5454	Branch	401.36	02/21/17
9311 College Parkway Fort Myers, Florida 33919 Tel: (239) 274-6250 Fax: (239) 336-5484	Branch	17.01	07/01/20



Closed Branches

LOCATION:	OFFICE:	GEOGRAPHY: (CENSUS TRACT)	DATE CLOSED:
2495 Palm Ridge Road Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.01	05/30/03 Note: This office was not officially closed, but a temporary location until the permanent building site was completed.
16681 McGregor Blvd., #305 Fort Myers, Florida 33908 Tel: (239) 210-7100 Fax: (239) 415-3386	Branch Office	19.05	07/20/07 Note: This office was not officially closed, but a temporary location until the permanent building site was completed.
2475 Library Way Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.01	01/29/21 Note: Main office relocated to 2406 Periwinkle Way



Services Provided (Deposits & Loans)

Personal:

Free Personal Checking

A non-interest earning basic checking account.

- ▶ No monthly maintenance fee
- ▶ Free pack of Welcome Checks
- ▶ Free online and mobile banking
- ▶ Free Bill Pay
- ▶ Minimum Opening Deposit: \$50

Hometown Checking

An interest-bearing account.

- ▶ No Monthly Maintenance Fee (with \$1,500 average daily balance)
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ Free, unlimited check writing
- ▶ 50% discount on safe deposit boxes
- ▶ Free online and mobile banking
- ▶ Free Bill Pay
- ▶ Minimum opening deposit: \$100
- ▶ Average daily balance required: \$1,500

Platinum Checking – Senior Account

A checking account for customers ages 50+.

- ▶ No monthly maintenance fee
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ Free, unlimited checks
- ▶ 50% discount on safe deposit boxes
- ▶ Free online and mobile banking
- ▶ Free bill pay
- ▶ Minimum Opening Deposit: \$100
- ▶ Direct deposit required



Business:

Business Checking

A checking account designed for businesses.

- ▶ No Monthly Maintenance Fee
- ▶ Free Online and Mobile Banking
- ▶ Free Bill Pay
- ▶ Free ACH Origination (debit and credit)*
- ▶ Free Positive Pay to prevent check fraud
- ▶ Free EZ Remote Deposit Capture to make deposits from your desk*
- ▶ Free Wire Manager to input wire transfers directly into our system from your computer*
- ▶ Minimum opening deposit: \$100

**with qualifying relationships*

Business Checking - with interest

An interest-bearing account available to businesses.

- ▶ No Monthly Maintenance Fee
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ Free Online and Mobile Banking
- ▶ Free Bill Pay
- ▶ Minimum opening deposit: \$100



Savings:

Savings Account

An interest-bearing account.

- ▶ No Monthly Maintenance Fee with balance maintained of \$300
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ (6) Free monthly transfers from savings to checking by preauthorized, automatic or telephone transfers
- ▶ Average Daily Balance required: \$300
- ▶ Minimum Opening Deposit: \$100

Money Market:

Personal Money Market Account

Competitive interest rates set weekly. Accounts with daily balances of \$25,000+ will earn a higher rate than those with less than \$25,000.

- ▶ No Monthly Maintenance Fee (with balance above \$2,500)
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ Terms and rates will vary



Certificates of Deposit:

With Certificates of Deposit, money is insured and earning interest. The longer the term, the more money earned.

- ◆ \$1,000 minimum balance and opening deposit*
- ◆ *Penalty for early withdrawal equals the amount of 60 days interest for CD's of one year or less in duration and 90 days interest for CD's of more than one year.
- ◆ *Terms and rates will vary

Individual Retirement Accounts (IRAs):

IRAs are a valuable resource in helping reach retirement savings goals. IRAs are offered using Certificates of Deposit with very competitive yields.

- ◆ \$500 minimum balance/opening deposit*
- ◆ *Penalty for early withdrawal equals the amount of 60 days interest for CD's of one year or less in duration and 90 days interest for CDs of more than one year.



Safe Deposit Boxes:

Sanibel Captiva Community Bank offers safe deposit rentals to protect a customer's valuable documents and personal property.

BOX SIZE	ANNUAL RENTAL FEE:
3" x 5"	\$25.00
5" x 5"	\$30.00
3" x 10"	\$35.00
5" x 10"	\$50.00
10" x 10"	\$100.00

OTHER RELATED CHARGES:	FEE:
Lost key replacement	\$25.00
Drill box charge	\$150.00



Cost of Other Services:

Service:	Fee / Comments:
Account balancing (per hour)	\$20.00
Account closed with 90 days of opening	\$20.00
ATM transactions at other banks	\$1.00
ATM transactions at Presto and AllPoint	No charge
Bond coupon processing (per envelope)	\$5.00
Bond coupons returned	(Correspondent charges)
Cashier's checks:	
Customer	\$5.00
Non-customer (exchange of check only)	\$10.00
Check printing charges	Varies with style
Collection Fees:	
Outgoing	\$10.00
Incoming	\$10.00
Dormant account (per month)	\$5.00
Accounts considered dormant after:	
Checking	1 year
Savings & Money Markets	2 years
Fax (per page)	\$2.00
Legal services (plus attorney fees)	\$100.00
Medallion Stamp (signature guarantee)	\$20.00
Night drop key deposit	\$5.00
Notary fee (non-customer)	\$10.00
NSF*	\$32.00
Online Banking monthly fee:	
Personal Online Banking with Bill Pay	No charge
Business Online Banking with Bill Pay	No charge
Business Online Banking w/ Treasury Mgmt. Service	\$20.00
Photocopies (per page)	\$0.50
Replacement of lost Debit / ATM cards	\$5.00
Research (per hour)	\$30.00
Per copy	\$2.00
Returned deposited item	\$10.00
Rolled coin	No charge
Snapshot statement	\$2.00
Stop payment	\$32.00
Telephone transfers	\$1.00
Wire Transfer (customers only):	
Outgoing	\$20.00
Incoming	\$8.00
Foreign outgoing	Correspondent charges

* This non-sufficient funds (NSF) fee applies to paid overdrafts created by check, in-person withdrawal, or other electronic means, as applicable.



Loan Products:

Sanibel Captiva Community Bank offers a full line of loan products for all lending needs. With both fixed and variable interest rates available, loan services include:

- Consumer Loans to Individuals
- Personal Lines of Credit

- Residential Mortgage – Purchase Money
- Residential Mortgage – Refinance
- Residential Bridge Loans
- Residential Real Estate Mortgages on a pass-through, secondary-market basis
- Construction only financing
- Construction/Permanent financing
- Lot Loans

- Home Equity Lines of Credit

- Overdraft Protection Line of Credit

- Commercial Term Loans to Individuals and/or their Business Interests
- Business Lines of Credit
- Commercial Real Estate Loans
- Commercial Real Estate – Construction
- Letters of Credit



Other Products:

Automatic Teller Machine (ATM)

Sanibel Captiva Community Bank is a member of the STAR, CIRRUS and PLUS ATM networks. ATM cards can be used at over 350,000 ATM machines worldwide and at any store with a point-of-sale (POS) STAR terminal. At present, the Bank has an ATM machine located at six of its eight branch offices. Two ATMs (located at Periwinkle and McGregor branches) are temporarily closed due from damages sustained from Hurricane Ian. The Bank also has two offsite ATMs located at Gartner (near Gateway branch) and a new ATM at Amavida retirement community since the end of September 2023. Visa debit cards can also be used without charge at any Publix 'Presto' ATMs and AllPoint machines.

Bank by Mail

The Bank processes transactions sent by mail and receipts are returned by mail.

Internet Banking

The Bank's website, www.sancapbank.com provides customers with 24-hour access to all their accounts. Customers can review account balances and check activity, initiate transfers between accounts, pay bills, download information to Quicken/Quickbooks or Microsoft Money. Also available - Zelle, Mobility Banking, Wire Manager, ACH Manager, Remote Deposit Capture (RDC), and Business Mobility. The Bank also offers e-statements to its customers. The Bank has also expanded its social media communication to its customers and the public via Facebook, X (f/k/a Twitter), and LinkedIn.

Night Depository System

A night depository drop is provided on the premises of each branch location for convenience to make deposits after banking hours. At the present time, the night depository drop at the McGregor branch is unavailable due to damages incurred from Hurricane Ian.

Cashier's Checks

The Bank provides cashier's checks available for purchase for customers only.

U.S. Savings Bonds

Sanibel Captiva Community Bank can assist customers to purchase U.S. Savings Bonds from the U.S. Treasury. U.S. Savings Bonds can be redeemed at any branch location.

Visa Debit Cards

Debit cards allow withdrawal of funds from a checking account without having to write a check, thereby enabling products and services to be purchased where debit cards are accepted. Since August 2016, the Bank offers Card Valet, providing card holders access to a variety of controls from their smartphones that can help determine when, where and how their cards are used as well as additional security to help prevent debit card fraud. Instant Issue debit cards are also available at all branch locations.

Wire Transfers - The Bank can wire funds in any amount in an easy and secure way for customers.



Hours of Operation

OFFICE:	HOURS:
Main Office	Lobby: Monday through Thursday 9:00am – 4:00pm Friday 9:00am – 5:00pm Saturday Closed
	Drive Thru: Same as lobby hours
Branch Offices	Lobby: Monday through Thursday 9:00am – 4:00pm Friday 9:00am – 5:00pm Saturday Closed
	Periwinkle Branch – Drive Thru: None
	McGregor Branch – Drive Thru: Same as lobby hours
	Winkler Branch – Drive Thru: Same as lobby hours
	College Branch – Drive Thru: None
	Downtown Branch – Drive Thru: None
	Gateway Branch – Drive Thru: Same as lobby hours
	Bridge Branch – Drive Thru: Same as lobby hours
	Operations Center



Assessment Area

The Bank's lending assessment area is represented of all Lee County, Florida:

LEE COUNTY GEOGRAPHIES <u>INCLUDED</u> IN ASSESSMENT AREA								
3.03	13.00	19.18	103.06	108.01	401.11	402.06	502.05	505.01
3.04	14.01	19.19	103.07	108.02	401.13	402.07	502.06	505.02
3.05	14.02	19.20	103.08	108.03	401.17	402.08	502.07	506.01
3.06	15.01	19.21	103.09	201.02	401.18	402.09	502.08	506.03
4.01	15.02	19.22	104.04	201.03	401.20	402.10	502.10	506.04
4.02	16.01	19.23	104.11	201.04	401.21	402.11	502.11	601.01
5.02	16.02	101.04	104.12	202.01	401.22	402.12	502.12	601.02
5.03	17.01	101.06	104.13	202.02	401.23	403.01	502.13	602.01
5.04	17.05	101.07	104.14	203.01	401.24	403.02	503.05	602.02
6.00	17.06	101.08	104.15	203.02	401.25	403.03	503.06	602.03
7.00	17.08	101.09	104.16	204.00	401.26	403.04	503.11	603.00
8.00	17.09	101.10	104.17	205.01	401.27	403.05	503.12	701.01
9.00	17.10	101.11	104.18	205.02	401.28	403.08	503.15	701.02
10.01	17.11	101.12	104.19	206.00	401.29	403.10	503.16	702.01
10.02	18.01	101.13	104.20	207.00	401.30	403.11	503.17	702.02
11.01	18.02	102.03	104.21	208.01	401.31	403.12	503.18	801.00
11.03	19.03	102.05	104.22	208.02	401.32	403.13	503.19	802.02
11.04	19.08	102.06	104.23	301.00	401.33	403.14	503.20	802.03
12.03	19.10	102.07	105.01	302.01	401.34	403.15	503.21	802.04
12.04	19.11	102.08	105.03	302.02	401.35	403.16	503.22	803.00
12.05	19.12	102.09	105.04	302.05	401.36	501.03	503.23	901.00
12.06	19.13	102.10	106.01	303.00	401.37	501.04	503.24	9800.00
12.07	19.15	103.02	106.02	401.08	401.38	501.05	503.25	9900.00
12.08	19.16	103.03	107.01	401.09	401.39	501.06	504.01	
12.09	19.17	103.05	107.02	401.10	402.05	502.04	504.02	



HMDA Disclosure Statement

Since 2006, the Bank's annual Home Mortgage Disclosure Act (HMDA) Statement is provided by the Federal Financial Institutions Examination Council (FFIEC).

The HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's Web site at www.consumerfinance.gov/hmda.



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2003	March 31	87.92%
	June 30	71.72%
	September 30	79.11%
	December 31	87.29%
2004	March 31	83.56%
	June 30	89.64%
	September 30	102.34%
	December 31	97.43%
2005	March 31	84.93%
	June 30	103.20%
	September 30	113.64%
	December 31	107.98%
2006	March 31	112.40%
	June 30	106.16%
	September 30	102.90%
	December 31	104.95%
2007	March 31	101.44%
	June 30	104.96%
	September 30	108.28%
	December 31	113.63%
2008	March 31	110.34%
	June 30	108.15%
	September 30	113.78%
	December 31	109.45%
2009	March 31	107.75%
	June 30	110.02%
	September 30	110.51%
	December 31	100.30%

Note: The Bank's loan-to-deposit ratio is calculated by dividing the Bank's net loans and leases by its total deposits.



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2010	March 31	99.26%
	June 30	100.47%
	September 30	105.38%
	December 31	103.26%
2011	March 31	96.16%
	June 30	94.52%
	September 30	98.67%
	December 31	101.32%
2012	March 31	86.52%
	June 30	89.44%
	September 30	97.72%
	December 31	99.34%
2013	March 31	98.32%
	June 30	99.88%
	September 30	98.21%
	December 31	100.27%
2014	March 31	93.68%
	June 30	98.00%
	September 30	100.50%
	December 31	101.50%
2015	March 31	94.67%
	June 30	93.06%
	September 30	103.03%
	December 31	109.79%
2016	March 31	100.32%
	June 30	93.97%
	September 30	100.36%
	December 31	107.10%

Note: The Bank's loan-to-deposit ratio is calculated by dividing the Bank's net loans and leases by its total deposits.



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2017	March 31	96.92%
	June 30	100.85%
	September 30	101.78%
	December 31	97.96%
2018	March 31	90.49%
	June 30	97.40%
	September 30	106.67%
	December 31	101.20%
2019	March 31	94.89%
	June 30	98.82%
	September 30	103.33%
	December 31	99.03%
2020	March 31	99.64%
	June 30	97.79%
	September 30	96.92%
	December 31	87.12%
2021	March 31	70.76%
	June 30	63.85%
	September 30	63.75%
	December 31	66.03%
2022	March 31	60.34%
	June 30	73.38%
	September 30	84.14%
	December 31	87.85%
2023	March 31	90.84%
	June 30	88.94%
	September 30	91.29%
	December 31	91.67%
2024	March 31	94.64%
	June 30	
	September 30	
	December 31	