



Community Reinvestment Act (CRA)

Public File

Published: March 19, 2025

Ryan Pierce, CRA Officer



**2024 Community Reinvestment Act
(CRA) Public File**

Table of Contents

Community Reinvestment Act (CRA) Statement.....	1
Maps of CRA Assessment Areas.....	4
Branch List.....	9
Closed & Relocated Branches & Loan to Deposits Ratio.....	10
Fee Schedule.....	11
CRA Written Public Comments	14
Home Mortgage Disclosure Act (HMDA) Notice	15
2022 Community Reinvestment Act (CRA) Performance Evaluation.....	16



COMMUNITY REINVESTMENT ACT (CRA) STATEMENT

PURPOSE OF CRA

The Community Reinvestment Act (CRA) became law in 1977. Its purpose is to encourage banks to meet the needs of their individual communities in terms of community development and credit availability for low-to-moderate income consumers and small or minority businesses. Recently revised statements have been published by the regulators reaffirming the purpose of the Community Reinvestment Act, which is to encourage all financial institutions to assess and meet the credit needs of their local communities, including low-to-moderate income areas, while maintaining their business strategies.

The Community Reinvestment Act Statement and Delineation shall be set by the Board of Directors of Riverview Bank. The Board of Directors shall approve any change in the Statement of Delineation of the communities at a regular Board meeting.

Riverview Bank will consider only such loans that would be legal loans as defined by applicable State and Federal regulations.

Riverview Bank will consider applications for credit for the following types and kinds of loans, within its designated communities, that meet the Bank's minimum underwriting guidelines:

1. 2 to 4 Family Dwelling Units (Commercial)
2. Multi-Family Dwelling Units
3. Commercial Real Estate Properties
4. Real Estate Development
5. Construction Loans (applicable to types listed above)
6. Home Equity Lines of Credit
7. Consumer Loans (secured and unsecured)
8. Lines of Credit (personal and business)
9. Community Development Loans
10. Commercial/Business Loans

Riverview Bank accepts applications for consumer closed end mortgage loans including purchase, refinancing, first time homebuyer, FHA, VA, and USDA programs subject to availability through our wholesale lending partners. Our wholesale lending partners are responsible for underwriting and funding loan requests.

RIVERVIEW BANK'S COMMITMENT

Riverview Bank has always been active in monitoring community credit needs and quick to respond to such needs with competitive leadership. Riverview has special concern and responds to credit needs on an individual basis. Each application receives individual attention and is given credit terms tailored to the individual when it is possible and within established minimum underwriting guidelines. Riverview's directors and officers meet with REALTORS®, businesspersons, governmental entities, community organizations, and individuals. These meetings include regular business associations and attendance at called meetings.

Riverview Bank actively seeks involvement with programs and organizations that benefit home ownership in the communities where we do business. A few of these are summarized below.

Riverview provides banking services and investments to Innovative Housing, Inc. (IHI). Its portfolio includes workforce housing in downtown Portland, large family apartments, and studios for people with physical and mental disabilities, and housing for individuals and families transitioning out of homelessness. IHI develops projects that meet community needs in creative and effective ways.



Riverview provides banking services and marketing support to Second Step Housing, which serves more than 275 individuals and families annually. They provide safe, affordable housing, case management and educational opportunities to adults, children and families who are working towards self-sufficiency. The agency partners with other nonprofits, local businesses, community members, and clients to help meet the housing needs of the community. Second Step Housing has developed and currently manages 120 units of transitional and affordable housing.

In 2017, Riverview became an active participant in the financial education programs developed by Financial Beginnings. Since 2005, Financial Beginnings and their partners have taught 135,000 youth and adults in partnership with over 250 schools and nearly 100 community-based organizations throughout Oregon. Financial Beginnings teaches individuals how to play an active role in their financial well-being. Developing this knowledge increases available life opportunities such as home ownership, higher education, and secure retirement.

Riverview is also a member of the Washington Community Reinvestment Association (WCRA). Riverview joined the WCRA in 2000. The WCRA is a non-profit lending consortium that was formed in 1992. The WCRA offers a shared-risk lending pool that provides long term financing for multi-family low income and special needs housing as well as real estate-based community development projects. The WCRA membership includes all the major financial institutions in the state and many regional and community banks and thrifts.

In Oregon, Riverview is a member of the Network for Oregon Affordable Housing (NOAH). NOAH is a non-profit consortium of Oregon Banks that was formed in 1990. NOAH offers a shared-risk lending pool that provides long term financing for multi-family rental housing which is affordable to lower-income populations. NOAH has more than 20 participating members in its membership.

Riverview is also a member of the Columbia River Economic Development Council (CREDC), Identity Clark County (ICC), Responsible Growth Forum (Clark County), Skamania County Economic Development Council, Klickitat Economic Development Council, East Metro Economic Alliance (Multnomah County) and the Strategic Economic Development Corporation (SEDCOR – Marion County). These non-profit entities are designed to promote economic development and diversification within the Bank's assessment area. Riverview provides meeting space for ICC board members.

Riverview continues active monitoring of community credit needs by establishing an Officer responsible to ensure the Bank's compliance with the Community Reinvestment Act.

COMMUNITY DELINEATION

Riverview Bank is committed to serve its delineated communities described as follows:

The Board of Directors and Management have defined the Bank's assessment area as the three contiguous counties of Clark, Skamania and Klickitat in the State of Washington; and Marion, Multnomah, Washington and Clackamas counties, in the State of Oregon. This delineated area incorporates the locations of Riverview's main office and all of its branches and deposit taking ATMs.



BRANCH AND PRODUCTION LOCATIONS

These branches offer Day & Night Depository Services, ATMs, and access to commercial lenders, consumer lenders, mortgage specialists, and the Riverview Trust Company:

Camas Branch: 450 NE 3rd Avenue, Camas, Washington, Clark County, Census Tract 0415.00

Washougal Branch: 3307 E. Evergreen Way, Washougal, Washington, Clark County, Census Tract 0405.08

Battle Ground Branch: 15 N.W. 13th Avenue, Battle Ground, Washington, Clark County, Census Tract 0404.14

Orchards Branch: 11505-K N.E. 4th Plain, Vancouver, Washington, Clark County, Census Tract 0413.12

Hazel Dell Branch: 1220 N.E. 88th Street, Vancouver, Washington, Clark County, Census Tract 0408.09

Vancouver Main Branch: 900 Washington Street, Vancouver, Washington, Clark County, Census Tract 0424.00

- Designated as a “main office” for Washington

Cascade Park Branch: 12019 SE Mill Plain Blvd., Vancouver, Washington, Clark County, Census Tract 0413.22

Salmon Creek Branch: 800 N.E. Tenney Rd. #D, Vancouver, Washington, Clark County, Census Tract 0409.10

Tech Center Branch: 320 S.E. 192nd Avenue, Vancouver, Washington, Clark County, Census Tract 0413.29

Riverview Center: 17205 S.E. Mill Plain Blvd, Vancouver, Washington, Clark County, Census Tract 0413.29

- This Operations Center provides access to Mortgage Specialists, Consumer, Commercial, Construction and Mortgage Lending services along with an ATM and Night Deposit.

Stevenson Branch: 225 S.W. 2nd Street, Stevenson, Washington, Skamania County, Census Tract 9503.00

White Salmon Branch: 330 E. Jewett Blvd, White Salmon, Washington, Klickitat County, Census Tract 9503.01

Goldendale Branch: 412 South Columbus, Goldendale, Washington, Klickitat County, Census Tract 9501.03

Aumsville Branch: 112 Main Street, Aumsville, Oregon, Marion County, Census Tract 0108.01

Gateway Branch: 10401 N.E. Halsey Street, Portland, Oregon, Multnomah County, Census Tract 0080.01

- Designated as a “main office” for Oregon

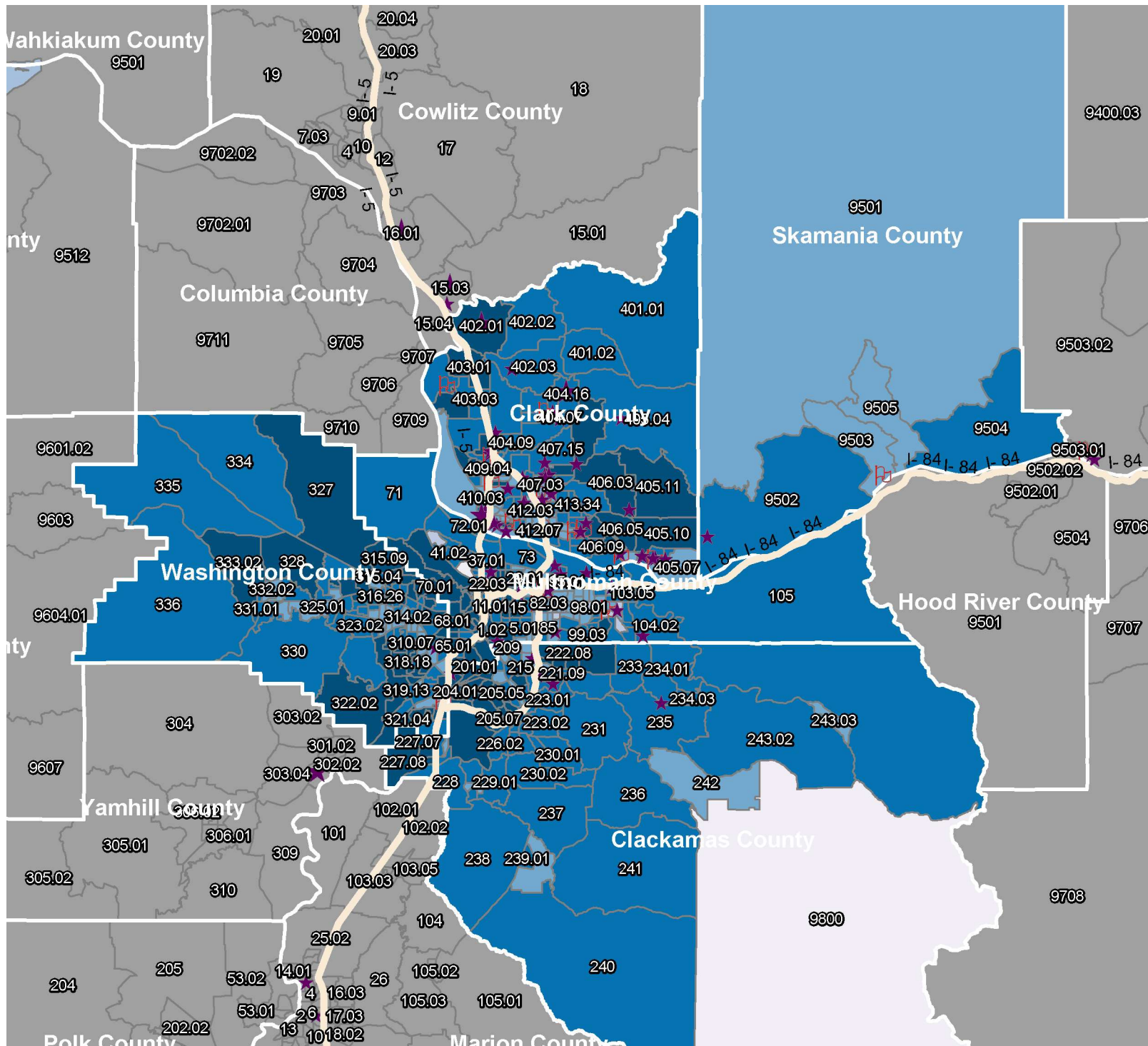
Gresham Branch: 225 N.E. Burnside Road, Gresham, Oregon, Multnomah County, Census Tract 0104.05

Tualatin Branch: 7447 S.W. Nyberg Street, Tualatin, Oregon, Washington County, Census Tract 0320.05

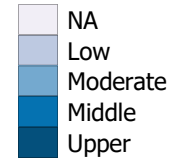
Ridgefield Branch: 4405 S Settler Drive, Ridgefield, Washington, Clark County, Census Tract 0403.03

Riverview Bank - 2024 CRA - ASSESSMENT AREA INCOME MAP

Portland Vancouver MSA*



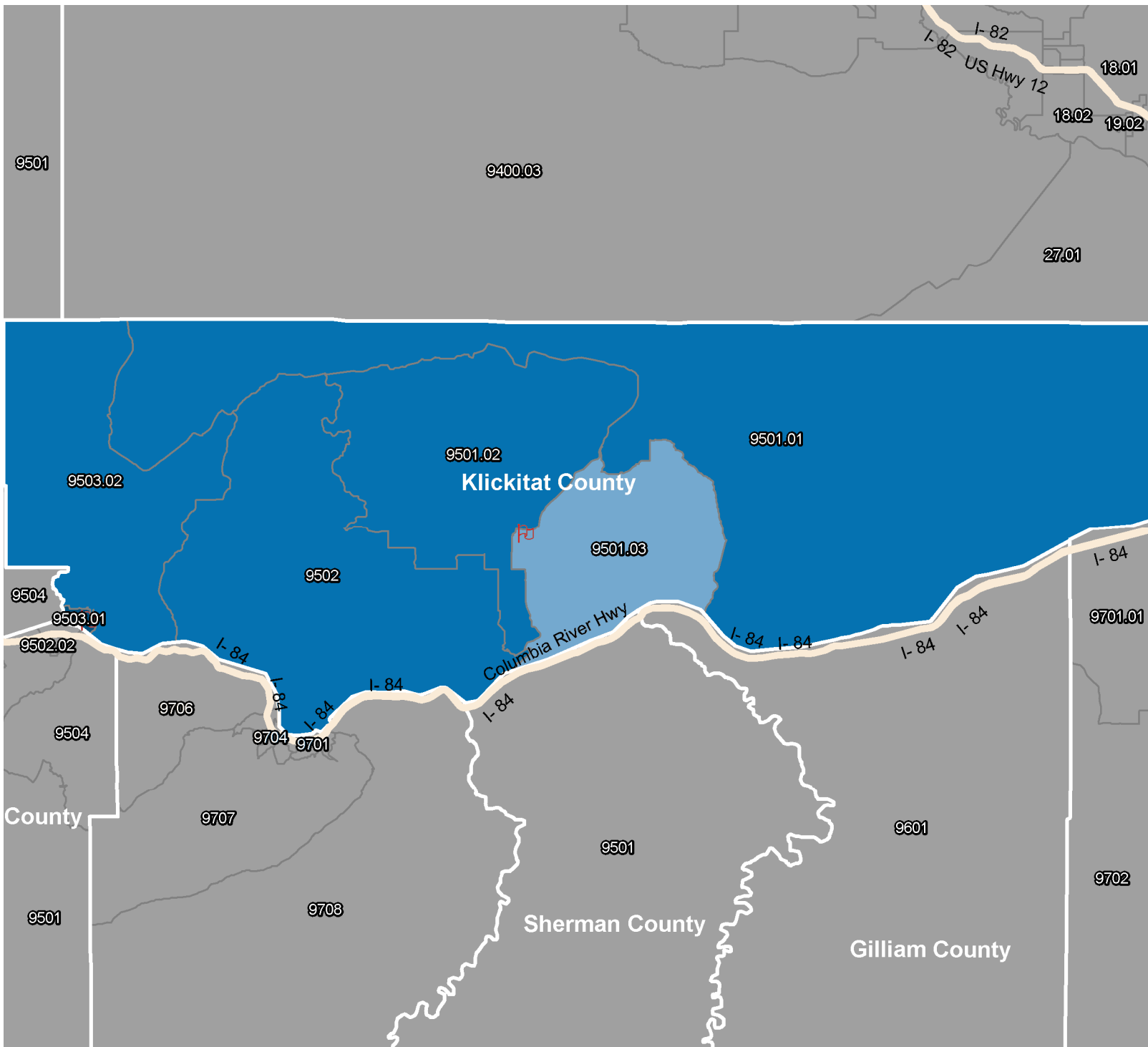
Income Level



★ Applications/Loans

▣ Bank Branches

Riverview Bank - 2022 CRA - ASSESSMENT AREA INCOME MAP
Klickitat County



Income Level

- NA
- Low
- Moderate
- Middle
- Upper

Bank Branches

Marion County



2024 BRANCHES

There is no material differences in the availability or cost of services between our branches.

* Drive Up opens at 8:30am Monday - Friday.

Branch	Address	City	Geographic Information	M-TH	Friday	Saturday	*Drive Up	ATM	Safe Deposit Boxes	Night Drop	Date Established	Date Closed
Camas	450 NE 3rd Ave	Camas, WA 98607	Clark County, Census Tract 415.00 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	6/29/2020	
Washougal	3307 Evergreen Way	Washougal, WA 98671	Clark County, Census Tract 405.08 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	1/1/1923	
Stevenson	225 SW Second St	Stevenson, WA 98648	Skamania County, Census Tract 9503.00 Middle Income	9am - 5pm	9am - 5:30pm	No	Yes	Yes	No	Yes	1/1/1923	
White Salmon	330 E. Jewett Blvd	White Salmon, WA 98672	Klickitat County, Census Tract 9503.00 Upper Income	9am - 5pm	9am - 5:30pm	No	Yes	Yes	Yes	Yes	1/1/1923	
Battle Ground	15 NW 13th Ave	Battle Ground WA 98604	Clark County, Census Tract 404.14 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	1/1/1923	
Goldendale	412 South Columbus	Goldendale, WA 98620	Klickitat County, Census Tract 9501.00 Middle Income	9am - 5pm	9am - 5:30pm	No	Yes	yes	no	Yes	1/1/1923	
Orchards	11505 K NE Fourth Plain	Vancouver, WA 98662	Clark County, Census Tract 413.12 Moderate Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	12/15/1994	
Hazel Dell	1220 NE 88th St	Vancouver, WA 98665	Clark County, Census Tract 408.09 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	5/13/1994	
Vancouver Main & Corporate Office	900 Washington St, Suite 100	Vancouver, WA 98660	Clark County, Census Tract 424.00 Upper Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	1/1/1923	
Salmon Creek	800 NE Tenney Road #D	Vancouver, WA 98685	Clark County, Census Tract 409.10 Upper Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	3/1/2000	
Tech Center	320 SE 192nd Ave	Vancouver, WA 98683	Clark County, Census Tract 413.29 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	1/3/2006	
Aumsville	112 Main St	Aumsville, OR 97325	Marion County, Census Tract 0108.01 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	4/22/2005	
Gateway	10401 NE Halsey St	Portland, OR 97220	Multnomah County, Census Tract 0080.01 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	11/1/2006	
Gresham	225 NE Burnside	Gresham, OR 97030	Multnomah County, Census Tract 0104.05 Moderate Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	6/29/2012	
Tualatin	7447 SW Nyberg St	Tualatin, OR 97062	Washington County Census Tract 0320.05 Low Income	9am - 5pm	9am - 6:00pm	No	No	Yes	No	Yes	2/18/2017	
Riverview Center (Lending & Operations Center)	17205 SE Mill Plain Blvd	Vancouver, WA 98683	Clark County, Census Tract 413.29 Middle Income	8am - 5pm	8am - 5pm	No	No	Yes	No	Yes	11/1/2005	
Cascade Park	12019 SE Mill Plain Blvd	Vancouver WA 98684	Clark County Census Tract 0413.22 Moderate Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	9/28/2020	
Ridgefield	4405 S Settler Dr	Ridgefield, WA 98642	Clark County, Census Tract 403.03 Middle Income	9am - 5pm	9am - 6:00pm	No	Yes	Yes	Yes	Yes	2/16/2022	

2024 Closed & Relocated Branches

No branches were closed or relocated in 2023 or 2024

Loan to Deposit Ratios

Loans/Deposits 2024 Q1	Loans/Deposits 2024 Q2	Loans/Deposits 2024 Q3	Loans/Deposits 2024 Q4
81.22%	83.75%	83.85%	83.98%

Consumer Fee Schedule

Effective December 1, 2023. All fees and service charges are subject to change. The following is the schedule of fees for banking services. These are for reflective services and may be assessed against your account should you use the services.

ACCOUNT SERVICES

Account Closure within 90 days of opening.....	\$40.00
Account Research (per hour/one hour minimum).....	\$40.00
ACH Correction (NOC, per notice).....1st \$5.00 / 2nd \$15.00 / 3rd+ \$25.00	
ACH Return Item (includes unauthorized returns).....	\$25.00
Cashier's Check Purchase.....	\$9.00
Coin Counting (per \$100).....	\$2.00
Collection Items (Domestic each) – Outgoing/Incoming.....	\$50.00
Copies of Items (per page).....	\$5.00
Counter Check (each).....	\$1.00
Dormant/Inactive Account Fee – no activity for 12 consecutive months (monthly).....	\$10.00
External Automatic Account Transfer (per transfer).....	\$10.00
Garnishment/Levies/Legal Process.....	\$150.00
Held Mail (monthly/per item).....	\$10.00
IRA Annual Fee (per account).....	\$15.00
IRA Outgoing Transfer.....	\$50.00
Money Market & Savings Excessive Transaction (per item).....	\$5.00
Rejected Item Correction (invalid item).....	\$5.00
Stop Payment.....	\$35.00
Subpoena Account Research (per hour).....	\$125.00
Undeliverable Statement Fee (monthly).....	\$5.00

ACCOUNT STATEMENT

Additional Statement Copies (per statement).....	\$3.00
Paper Statement Fee (monthly)	
<i>(waived for Senior Checking, Columbia Gorge Checking & Minor Savings).....</i>	
Paper Statement with Check Images (monthly).....	\$6.00

CANADIAN & FOREIGN DEPOSITED ITEMS

Canadian Item.....	\$30.00
Return Canadian Item.....	\$35.00
Foreign Check Collection.....	\$150.00

DEBIT CARD AND ATM FEES

Riverview Bank ATM*.....	no charge
ATM Transaction Fee (Non-Riverview Bank ATM*).....	\$2.50
International ATM Withdrawal.....	\$5.00
Debit Card Handling/Card Mailed to Branch.....	\$5.00
Debit Card Replacement.....	\$10.00
Debit Card Rush Order.....	\$90.00

ID THEFTSMART

Identity Management & Restoration (per month).....	\$5.00
Single Bureau Credit Monitoring & Restoration (per month).....	\$8.00
Full Credit Monitoring & Restoration (per month).....	\$12.00

INSUFFICIENT FUNDS AND OVERDRAFTS

Overdraft Paid or Returned Item..... \$35.00 each
For Consumer accounts, there is a limit of five (5) insufficient funds/overdraft fees per day. Overdraft may be created by checks issued by you, in person, ATM, ACH or other electronic withdrawal authorized by you or published fees or charges for bank products & services.

Fees are limited to a daily maximum of five (5). The fee will be assessed for overdrafts paid, overdrafts returned, or a combination paid and/or returned that cause an overdraft greater than \$5. If the total overdraft amount is \$5 or less, the overdraft fee will be waived. The fee will be charged per debit items drafted by you (such as a check) or a transaction you set up (such as a preauthorized transfer). We do not charge an overdraft fee on non-recurring debit card transactions, for fees listed herein that cause an overdraft or for a monthly service fee to maintain your account as listed in the Truth in Savings Disclosure provided at account opening.

Continuous Overdraft..... \$5.00 each
Assessed when any account that has a negative balance for five (5) consecutive business days for any reason including but not limited to negative balances caused by overdrafts, returned items, Bank fees listed in this Fee schedule, account monthly services fees and third-party fees. Fee will not be assessed on negative balances caused by non-recurring debit cards transactions. The fee will be charged per business day up to a maximum of ten (10) business day charges, per negative balance occurrence, until a deposit is made to bring the account balance positive, or the account is closed by the Bank. A notice will be sent beginning on the 5th business day notifying you of the assessed charge.

Overdraft Protection Transfer..... \$10.00 each
A transfer fee will be charged for each transfer made from an eligible linked account. Refer to your Overdraft Protection Transfer Authorization Agreement.

SAFE DEPOSIT BOXES

Note safe deposit boxes are not FDIC insured.
Ask for availability and pricing
Safe Deposit Box Key (deposit)..... \$50.00
Safe Deposit Box Drill..... \$350.00
Safe Deposit Box Late Fee..... \$10.00

WIRE TRANSFERS

Domestic	
Outgoing.....	\$35.00
Incoming.....	\$15.00
Wire Trace.....	\$40.00
Foreign	
Incoming.....	\$20.00
Wire Trace.....	\$75.00

**When using a Riverview Bank debit card at a Riverview Bank ATM there is no usage fee, which includes transactions at MoneyPass network ATMs and/or Shazam Privileged Status ATMs.*

Business Fee Schedule

Effective December 1, 2023. All fees and service charges are subject to change. The following is the schedule of fees for banking services. These are for reflective services and may be assessed against your account should you use the services.

ACCOUNT SERVICES

Account Closure within 90 days of opening.....	\$40.00
Account Research (per hour/one hour minimum).....	\$40.00
Cashier's Check Purchase.....	\$9.00
Cash Vault/Armored Services (per month/per account).....	\$100.00
Cash Vault/Armored Transportation (per location).....	at cost
Coin Counting (per \$100).....	\$2.00
Collection Items (Domestic each) – Outgoing/Incoming.....	\$50.00
Copies of Items (per page).....	\$5.00
Counter Check (each).....	\$1.00
Dormant/Inactive Account Fee – no activity for 12 consecutive months (monthly).....	\$10.00
External Automatic Account Transfer (per transfer).....	\$10.00
Garnishment/Levies/Legal Process.....	\$150.00
Held Mail (monthly/per item).....	\$10.00
Line of Credit Sweep (to/from Analyzed Checking Account).....	\$125.00
Money Market & Savings Excessive Transaction (per item).....	\$5.00
Night Deposit Key (deposit).....	\$25.00
Rejected Item Correction (invalid item).....	\$5.00
Stop Payment.....	\$35.00
Subpoena Account Research (per hour).....	\$125.00
Undeliverable Statement Fee (monthly).....	\$5.00

ACCOUNT STATEMENT

Additional Statement Copies (per statement).....	\$3.00
Paper Statement Fee (monthly).....	\$3.00
Paper Statement with Check Images (monthly).....	\$6.00
Verification of Deposit (Business Accounts).....	\$10.00

ANALYZED CHECKING ACCOUNT

Monthly Maintenance.....	\$20.00
ACH Addenda Record (per page).....	\$5.00
ACH Per Item Posted (debit or credit).....	\$0.20
Branch Deposit.....	\$1.00
Cash & Coin (deposited or withdrawn).....	0.20%
Check Paid.....	\$0.25
Deposited Items.....	\$0.15
Zero Balance Account (to/from Analyzed Checking Account).....	\$10.00
Negative Collected Balance (assessed daily).....	WSJ Prime plus 3%

BUSINESS REMOTE DEPOSIT (e-Deposit)

Remote Deposit Monthly Fee (incl use of one bank-owned scanner).....	\$55.00
Remote & Mobile Deposit (per deposit).....	\$0.50
Remote Deposit Item Deposited (per check).....	\$0.10
Scanner Rental (per additional scanner, per month).....	\$25.00
Scanner Purchase (excludes tax and shipping).....	\$500.00
Scanner Inkjet Cartridge (first cartridge no charge).....	\$25.00
Service cancellation within 2 years.....	\$250.00

CANADIAN & FOREIGN DEPOSITED ITEMS

Canadian Item.....	\$30.00
Return Canadian Item.....	\$35.00
Foreign Check Collection.....	\$150.00

DEBIT CARD AND ATM FEES

Riverview Bank ATM*.....	no charge
ATM Transaction Fee (Non-Riverview Bank ATM*).....	\$2.50
International ATM Withdrawal.....	\$5.00
Debit Card Handling/Card Mailed to Branch.....	\$5.00
Debit Card Replacement.....	\$10.00
Debit Card Rush Order.....	\$90.00

FRAUD PROTECTION

Positive Pay - Check and ACH (per account, per month).....	\$55.00
Positive Pay Return (per item).....	\$12.00

ONLINE BANKING

Business Online Banking (multi-users, per month).....	\$20.00
Business Online Banking (with ACH Origination, per month).....	\$50.00
Commercial Online Banking (multi-users, per month).....	\$50.00
ACH Origination (Commercial only, per month).....	\$20.00
ACH Origination (per batch).....	\$2.00
ACH Origination (per item).....	\$0.10
ACH Return Item (includes unauthorized returns).....	\$25.00
ACH Same Day (per batch).....	\$12.00
ACH Correction (NOC, per notice).....1st \$5.00 / 2nd \$15.00 / 3rd+ \$25.00	

SAFE DEPOSIT BOXES

Note safe deposit boxes are not FDIC insured.

Ask for availability and pricing	
Safe Deposit Box Key (deposit).....	\$50.00
Safe Deposit Box Drill.....	\$350.00
Safe Deposit Box Late Fee.....	\$10.00



**When using a Riverview Bank debit card at a Riverview Bank ATM there is no usage fee, which includes transactions at MoneyPass network ATMs and/or Shazam Privileged Status ATMs.*

FEE SCHEDULE CONTINUED

PRIVATELY OWNED ATM

Client Owned/Leased ATM Documentation Review (prior to opening/per ATM).....	\$250.00
Client Owned/Leased ATM (Analyzed only/per ATM/per month).....	\$20.00

INSUFFICIENT FUNDS AND OVERDRAFTS

Overdraft Paid or Returned Item (each).....	\$35.00
Overdraft may be created by checks issued by you, in person, ATM, ACH or other electronic withdrawal authorized by you or published fees or charges for bank products & services.	

The fee will be assessed for overdrafts paid, overdrafts returned, or a combination paid and/or returned that cause an overdraft greater than \$5. If the total overdraft amount is \$5 or less, the overdraft fee will be waived. The fee will be charged per debit items drafted by you (such as a check) or a transaction you set up (such as a preauthorized transfer). We do not charge an overdraft fee on non-recurring debit card transactions, for fees listed herein that cause an overdraft or for a monthly service fee to maintain your account as listed in the Truth in Savings Disclosure provided at account opening.

Continuous Overdraft (each).....	\$5.00
Assessed when any account that has a negative balance for five (5) consecutive business days for any reason including but not limited to negative balances caused by overdrafts, returned items, Bank fees listed in this Fee schedule, account monthly services fees and third-party fees. Fee will not be assessed on negative balances caused by non-recurring debit cards transactions. The fee will be charged per business day up to a maximum of ten (10) business day charges, per negative balance occurrence, until a deposit is made to bring the account balance positive, or the account is closed by the Bank. A notice will be sent beginning on the 5th business day notifying you of the assessed charge.	

Overdraft Protection Transfer (each).....	\$10.00
A transfer fee will be charged for each transfer made from an eligible linked account. Refer to your Overdraft Protection Transfer Authorization Agreement.	

WIRE TRANSFERS

Domestic	
Outgoing.....	\$35.00
Outgoing, Online (requires Commercial Online Bkg.).....	\$17.00
Reverse Wire Drawdown.....	\$35.00
Incoming.....	\$15.00
Wire Trace.....	\$40.00
Foreign	
Outgoing.....	\$50.00
Incoming.....	\$20.00
Wire Trace.....	\$75.00



Riverview

BANK

It's about you

Business Fee Schedule





COMMUNITY REINVESTMENT ACT WRITTEN COMMENTS

Riverview Bank has received no written comments from the public for this current year or the two prior calendar years that specifically relate to the bank's performance in helping to meet community credit needs.

PRODUCTS GENERALLY OFFERED AT RIVERVIEW BANK BRANCHES

Deposit – consumer and business

- Checking
- Savings
- Money Market
- Certificate of Deposit
- Individual Retirement Accounts

Loans

- HELOC
- Auto/RV
- CD/Savings secured
- Personal line of credit
- Overdraft line of credit
- Unsecured loans



Home Mortgage Disclosure Act Notice

The Home Mortgage Disclosure Act (HMDA) data about our residential mortgage lending is available online for review. The data shows the geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions is also available online.

The data is accessed online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.

PUBLIC DISCLOSURE

November 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Riverview Bank
Certificate Number: 29922

900 Washington Street
Vancouver, Washington 98660

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

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

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

TABLE OF CONTENTS

INSTITUTION RATING.....	1
DESCRIPTION OF INSTITUTION.....	2
DESCRIPTION OF ASSESSMENT AREAS	3
SCOPE OF EVALUATION	4
CONCLUSIONS ON PERFORMANCE CRITERIA	5
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	9
PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA - Full-Scope Review.....	10
DESCRIPTION OF INSTITUTION’S OPERATIONS IN PORTLAND-VANCOUVER- HILLSBORO MULTISTATE MSA	10
SCOPE OF EVALUATION – PORTLAND-VANCOUVER-HILLLSBORO MULTISTATE MSA	13
CONCLUSIONS ON PERFORMANCE CRITERIA IN PORTLAND-VANCOUVER- HILLSBORO MULTISTATE MSA.....	13
WASHINGTON - Full-Scope Review.....	19
DESCRIPTION OF INSTITUTION’S OPERATIONS IN WASHINGTON	19
SCOPE OF EVALUATION - WASHINGTON.....	21
CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON	21
OREGON - Full-Scope Review	26
DESCRIPTION OF INSTITUTION’S OPERATIONS IN OREGON.....	26
SCOPE OF EVALUATION - OREGON	28
CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON	28
APPENDICES.....	34
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA	34
SUMMARY OF RATINGS FOR RATED AREAS.....	35
GLOSSARY	36

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 (LTD) ratio is reasonable given the institution's size, financial condition, and the assessment area credit needs.
- The bank originated a majority of small business loans within its assessment area.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Outstanding.

- The institution demonstrated excellent responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

DESCRIPTION OF INSTITUTION

Riverview Community Bank, a state-chartered commercial bank headquartered in Vancouver, Washington, was renamed Riverview Bank (Riverview) on August 9, 2022. Riverview is a wholly-owned subsidiary of Riverview Bancorp Inc., also headquartered in Vancouver, Washington. On April 28, 2021, Riverview converted from a federal savings bank to a Washington commercial bank. The institution does not have any lending-related subsidiaries or affiliates. There were no merger or acquisition activities since the last examination. Riverview received a “Satisfactory” rating at the prior Office of the Comptroller of the Currency Performance Evaluation, dated May 28, 2018, based on Intermediate Small Institution Examination Procedures.

Riverview operates 17 full-service branches and 1 limited-service branch in the assessment areas with 14 branches in Washington and 4 branches in Oregon. During the evaluation period, the bank opened one branch, closed two branches, and relocated two branches within the Portland-Vancouver-Hillsboro, Washington-Oregon (PVH) Multistate MSA assessment area. Refer to the rated areas for additional information.

Riverview offers consumer, agricultural, and commercial loan products, primarily focusing on commercial lending. The bank stopped offering residential loan products in 2019. The bank also offers a variety of business and consumer deposit accounts including checking, savings, money market, certificate of deposit accounts, and individual retirement accounts. Alternative banking services include online banking, mobile banking, bill pay, person-to-person payments, digital payments, text banking, and bank-owned ATMs located at each branch.

As of September 30, 2022, assets totaled approximately \$1.7 billion and included total loans of \$1.0 billion and total securities of \$464.7 million. Riverview reported total deposits of \$1.5 billion. Since the prior evaluation, assets increased by 31.4 percent, total loans increased by 8.0 percent, and deposits increased by 33.7 percent. The following table illustrates the institution’s loan portfolio.

Loan Portfolio Distribution as of 09/30/2022		
Loan Category	\$(000s)	%
Construction and Land Development	52,673	5.2
Secured by Farmland	3,342	0.3
1-4 Family Residential	139,929	13.8
Multi-family (5 or more) Residential	58,367	5.8
Commercial Real Estate	565,316	56.0
Total Real Estate Loans	819,627	81.1
Commercial and Industrial	140,254	13.9
Agricultural	49,463	4.9
Consumer	1,593	0.1
Obligations of State and Political Subdivisions in the United States	-	0.0
Other	71	0.0
Less: Unearned Income	-	0.0
Total Loans	1,011,008	100.0
<i>Source: 09/30/2022 Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that would limit the institution's ability to meet the credit needs of its assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

Riverview has designated three assessment areas: the PVH Multistate MSA assessment area, Salem MSA assessment area, and WA Non-MSA assessment area. During the evaluation period, Riverview expanded the PVH Multistate assessment area to include the entirety of Washington County, Oregon when only limited tracts were delineated at the prior evaluation. There were no changes to the Washington Non-MSA assessment area or Salem MSA assessment area during the review period. The following table depicts the institution's three rated areas and assessment areas with respective counties, state, number of census tracts, and branches. Refer to the individual rated area sections of this Performance Evaluation for additional information.

Description of Assessment Areas			
Assessment Area	Counties & State	Census Tracts	Branches
PVH Multistate MSA	Clark County, WA Skamania County, WA Clackamas County*, OR Multnomah County, OR Washington County, OR	432	15
Washington			
Washington Non-MSA	Klickitat County	3	2
Oregon			
Salem MSA	Marion County	58	1
<i>Source: Bank Records</i> <i>*Partial County Delineation</i>			

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the previous evaluation May 28, 2019, to the current evaluation November 7, 2022. Examiners used the Interagency Intermediate Small Institution Examination Procedures, which include the Lending Test and the Community Development Test. Please refer to the Appendix for details regarding the criteria considered in these tests.

In addition to a review of the combined assessment area, the Interstate Banking and Branching Efficiency Act (IBBEA) requires separate discussion and rating of CRA performance in each state in which the bank maintains a branch. IBBEA also requires separate conclusions of CRA performance in each MSA in which the bank maintains a branch. As such, this evaluation will present four ratings: an MSA rating for the performance in the PVH MSA; a state rating for Washington for the performance in the Washington Non-MSA assessment area; a state rating for Oregon for the performance in the Salem MSA assessment area; and an overall rating. Examiners placed the most weight on the PVH MSA rated area in arriving at overall conclusions as it has the majority of the activities as depicted in the following table.

Examiners used full-scope procedures to evaluate the lending performance in all three assessment areas. Performance in the Washington Non-MSA assessment area and Salem MSA assessment area do not significantly influence the overall rating due to the minimal volume of lending in those areas.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
PVH Multistate MSA	205,324	97.6	1,318,035	87.5	15	83.3
Washington Non-MSA	3,750	1.8	153,419	10.2	2	11.1
Salem MSA	1,206	0.6	35,469	2.3	1	5.6
Total	210,280	100.0	1,506,923	100.0	18	100.0
<i>Source: Bank Records; FDIC Summary of Deposits (6/30/2022).</i>						

Activities Reviewed

Examiners reviewed small business loans as they represent the bank's major product line. Examiners did not evaluate home mortgage loans and small farm loans, as these loans did not represent major product lines and did not provide material weight for the ratings.

Riverview is not required to collect or report small business loans pursuant to CRA. However, the bank collects sufficient information including gross annual revenues (GARs) for analysis. Therefore, examiners analyzed all small business loans originated in 2019, 2020, and 2021.

During the evaluation period, Riverview originated 131 small business loans totaling \$37.2 million in 2019, 855 small business loans totaling \$121.8 million in 2020, and 613 small business loans totaling \$97.7 million in 2021. Examiners presented all three years to reflect the impact of Paycheck Protection Program (PPP) loans originated during the pandemic. The PPP is a federal loan program created to assist businesses in keeping their workforce employed during the COVID-19 pandemic. Over the evaluation period, Riverview addressed the credit needs of small businesses during the pandemic by originating 639 PPP loans totaling approximately \$71.5 million in 2020 and 327 PPP loans totaling approximately \$35.2 million in 2021.

Examiners compared small business loan data to D&B data in the assessment areas since Riverview does not report small business loans. The evaluation presents the number and dollar volume of small business lending; however, examiners emphasized performance by number of loans, as the number of originations is a better indicator of businesses served.

Examiners also reviewed community development activities from January 1, 2019, to November 7, 2022, as the prior evaluation did not consider 2019 community development activities.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The overall Lending Test performance is rated Satisfactory.

The performance under the LTD ratio, Assessment Area Concentration, Geographic Distribution, and Borrower Profile support this conclusion. The overall performance is consistent with the performance in each rated area. Refer to the individual assessment area sections for detailed discussions of the Lending Test performance.

LTD Ratio

The LTD ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The LTD ratio averaged 66.5 percent over the 14 calendar quarters from March 31, 2019, to September 30, 2022. The ratio ranged from a high of 94.6 percent as of June 30, 2019, to a low of 59.2 percent as of September 30, 2021.

Examiners compared the average net LTD ratio to three similarly situated institutions selected based on asset size, geographic location and lending focus. As shown in the following table, Riverview continued to maintain a net LTD ratio comparable to similarly situated institutions.

Loan-to-Deposit Ratio Comparison		
Institution	Total Assets \$(000s)	Average Net LTD Ratio (%)
Riverview Bank	1,683,600	66.5
Similarly Situated Institution #1	1,627,935	51.3
Similarly Situated Institution #2	1,374,504	48.8
Similarly Situated Institution #3	1,858,452	69.4
<i>Source: Reports of Income and Condition 3/31/2019 through 9/30/2022</i>		

Assessment Area Concentration

A majority of Riverview's small business loans are in the assessment areas as shown in the following table.

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		
	#	%	#	%		\$	%	\$	%	
Small Business										
2019	104	79.4	27	20.6	131	32,002	85.9	5,238	14.1	37,240
2020	782	91.5	73	8.5	855	108,512	89.1	13,290	10.9	121,802
2021	436	71.1	177	28.9	613	69,766	71.4	27,896	28.6	97,662
Total	1,322	82.7	277	17.3	1,599	210,280	81.9	46,424	18.1	256,704
Source: Bank Data										
Due to rounding, totals may not equal 100.0%										

Geographic Distribution

Geographic distribution of loans reflects excellent dispersion throughout the assessment areas. The excellent performance of small business lending within the PVH Multistate MSA rated area primarily supports this conclusion. The performance is not consistent throughout the rated areas. The performance in Oregon is below the overall performance. Examiner did not evaluate performance in Washington, as there were no low- and moderate-income geographies within the assessment area.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes throughout the assessment areas. The reasonable performance of small business lending within the PVH Multistate MSA rated area primarily supports this conclusion. The performance is consistent throughout the three rated areas.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

The Community Development Test is rated Outstanding. The community development performance demonstrates excellent responsiveness to community development needs in the assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities.

The conclusions of the overall performance are inconsistent among all three rated areas. The community development performance in PVH Multistate MSA is consistent with the overall rating. Riverview's performance in Washington and Oregon was below the overall rating.

The level of community development loans and qualified investments has significantly increased while the volume of community development services decreased since the prior evaluation.

Community Development Loans

Riverview's current level of community development lending represents a significant increase from the previous evaluation's volume of 75 community development loans totaling approximately \$10.9 million. More specifically, the institution's current level of community development lending increased by 10.7 percent by number of community development loans and 713.7 percent by dollar volume since the previous evaluation. This lending activity level represents 6.1 percent of average total assets and 9.5 percent of average total loans. These performance ratios exceed the levels of similarly-situated institutions.

Management directed a majority of the community development lending towards revitalization and stabilization efforts, reflecting responsiveness to this community development need as determined by examiners. Included in the community development loans are 18 PPP loans totaling approximately \$8.4 million during the review period; 12 PPP loans originated totaling approximately \$6.1 million in 2020 and 6 PPP loans originated totaling approximately totaling \$2.3 million in 2021.

The total of community development lending also includes 19 loans totaling approximately \$12.0 million that benefitted the broader regional or statewide area, primarily Oregon and Washington. Riverview participates in two loan consortiums; the Network for Oregon Affordable Housing (NOAH) and the Washington Community Reinvestment Association (WCRA). During the review period, Riverview participated in 13 affordable housing projects totaling \$849,000 through NOAH,

and 4 affordable housing projects totaling \$66,000 through WCRA. In addition, Riverview further supplemented community development lending activities throughout the assessment areas by funding a statewide construction project in a moderate-income tract totaling \$10.3 million and a statewide affordable housing project totaling \$853,000 whereby rent is set below HUD fair market value in 2021.

The following table illustrates the community development lending activities by year, and purpose. Refer to the assessment area sections for specific examples of community development lending.

Community Development Lending Institution Level										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	11	340	3	750	-	-	2	14,054	16	15,144
2020	7	167	8	7,450	12	6,090	2	9,000	29	22,707
2021	12	2,004	4	1,470	6	2,261	3	16,426	25	22,161
YTD 2022	9	1,933	1	50	-	-	3	27,085	13	29,068
Total	39	4,444	16	9,720	18	8,351	10	66,565	83	89,080
<i>Source: Bank Data</i>										

Qualified Investments

Qualified community development investment and donation activity significantly improved during the evaluation, as there were no qualified investments reported at the prior evaluation. The current qualified investments and donations activity represents 1.3 percent of average total assets and 7.6 percent of average total investments. Donations decreased by 8.7 percent from the prior evaluation's donation volume of \$470,000. The overall performance level compares well to similarly-situated institutions operating in or near the assessment areas. Management invested mostly in affordable housing projects, which demonstrates excellent responsiveness to a primary community development need confirmed by a community contact.

Riverview also made region wide qualified investments. Included in the totals below, Riverview made three grants totaling \$22,500 to a qualified organization that provides financial literacy and three investments totaling approximately \$5.0 million toward affordable housing projects that benefit low-and moderate-income individuals and families within the regional area.

Qualified Investments Institution Level										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021	5	15,986	-	-	-	-	-	-	5	15,986
YTD 2022	3	2,661	-	-	-	-	-	-	3	2,661
Subtotal	8	18,647	-	-	-	-	-	-	8	18,647
Qualified Grants & Donations	10	20	121	347	14	43	3	19	148	429
Total	18	18,667	121	347	14	43	3	19	156	19,076
<i>Source: Bank Data</i>										

Refer to the individual Assessment Area sections for specific examples of qualified investments and donations.

Community Development Services

Community development services decreased by 70.9 percent since the previous evaluation's volume of 7,030 hours. The significant decline in community development services in 2020 and 2021 is attributed to the pandemic mandate, which curtailed opportunities for community development services. However, the performance level of 2,048 hours (143 instances) aligns with similarly-situated institutions. Executive officers, senior management, and employees continued to provide a substantial majority of community development services in the PVH Multistate MSA assessment area.

Community Development Services Institution Level					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	Hours	Hours	Hours	Hours	Hours
2019	28	980	32	89	1,129
2020	24	400	12	50	486
2021	7	404	3	3	417
YTD 2022	-	16	-	-	16
Total	59	1,800	47	142	2,048
<i>Source: Bank Data</i>					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA

CRA RATING FOR PVH MULTISTATE MSA: **SATISFACTORY**

The Lending Test is rated: **Satisfactory**

The Community Development Test is rated: **Outstanding**

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA

The evaluation for the PVH Multistate MSA rated area considered the operations in Clark and Skamania Counties in Washington and Multnomah County and a portion of Clackamas County in Oregon. These five counties make up the majority of the PVH Multistate MSA. Changes to the assessment area are limited since the prior evaluation and are noted in the overall Description of Assessment Areas section.

Riverview operates 14 full-service branches and 1 limited-service office within the PVH Multistate MSA assessment area. The bank has one branch in a low-income tract (in Washington County); three branches in moderate-income tracts (two in Clark County and one in Multnomah County); nine branches in middle-income tracts (seven in Clark County, one in Skamania County, and one in Multnomah County); and two branches in upper-income tracts (Clark County). The limited-service banking office is located in a middle-income tract in Clark County. The following table depicts the branch network changes within the assessment area during the evaluation period. These branch changes did not affect the availability of services in low- and moderate-income areas.

Branch Opening, Closing and Relocation					
Branch	County	State	Date	Activity	Census Tract
Ridgefield	Clark	WA	02/16/2022	Open	Upper Income
Cascade Park	Clark	WA	09/01/2020	Relocate	From Middle-income to Low-Income
Camas	Clark	WA	06/26/2020	Relocate	Middle Income
MacArthur	Clark	WA	01/24/2021	Close	Upper Income
Montavilla	Multnomah	OR	05/20/2021	Close	Middle Income
Source: Bank Data					

Please refer to the operations portion under the Description of Institution for a full discussion regarding operations and product offerings.

Economic and Demographic Data

According to the 2015 ACS data, the PVH Multistate MSA consists of 11 low-income tracts, 109 moderate-income tracts, 185 middle-income tracts, 124 upper-income tracts, and 3 census tracts with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: PVH Multistate MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	432	2.5	25.2	42.8	28.7	0.7
Population by Geography	2,027,233	2.2	26.4	43.0	28.2	0.2
Housing Units by Geography	824,664	2.1	26.0	42.6	28.9	0.3
Owner-Occupied Units by Geography	462,612	0.9	20.1	45.4	33.6	0.1
Occupied Rental Units by Geography	318,105	3.8	34.2	39.0	22.5	0.6
Vacant Units by Geography	43,947	2.3	29.4	40.4	26.8	1.1
Businesses by Geography	271,441	2.8	22.6	38.3	34.1	2.3
Farms by Geography	5,821	2.0	19.5	46.7	31.0	0.8
Family Distribution by Income Level	489,346	21.3	17.2	20.2	41.2	0.0
Household Distribution by Income Level	780,717	24.1	16.2	18.0	41.8	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR- WA MSA		\$73,089	Median Housing Value			\$287,922
			Median Gross Rent			\$1,027
			Families Below Poverty Level			9.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to 2021 D&B data, service industries represented the largest portion of businesses at 38.7 percent; followed by non-classifiable establishments at 23.7 percent; retail trade at 10.0 percent; and finance, insurance, and real estate at 9.6 percent. D&B data also indicates the majority of businesses are very small. By number, 62.4 percent of businesses employ four or fewer employees and 93.6 percent operate from a single location. In addition, Moody's data indicates the cost of operating a business in the assessment area exceeds national averages.

According to Moody's Analytics as of August 2022, the PVH Multistate MSA assessment area is outclassing its state and national counterparts. The labor market is outperforming and recent employment increases have outpaced other tech hubs in the West. Strong growth is broad-based, though manufacturing has skyrocketed due to gains in tech manufacturing. The area's strong job market has pulled the unemployment rate below the national average and encouraged extremely strong expansion of the labor force. Semiconductors are the heart of the assessment area's high-tech manufacturing industry and key to its competitiveness in the tech sphere. The assessment area is the nation's second largest metro area for total semiconductor jobs.

The top five employers in the assessment area are Intel Corp., Providence Health Systems, Oregon Health & Science University, Nike Inc., and Kaiser Foundation Health Plan of the NW.

According to the U.S. Bureau of Labor and Statistics, the unemployment rates were generally stable in 2019, increased significantly in 2020 due to the pandemic, and improved in 2021. County performance in comparison to state and national averages varied; see the following table.

Unemployment Rates			
Area	2019	2020	2021
	%	%	%
PVH Multistate MSA	3.5	7.8	5.1
Clark County, WA	4.8	8.4	5.5
Skamania County, WA	5.5	9.2	6.4
Clackamas County, OR	3.4	7.2	4.8
Multnomah County, OR	3.2	8.6	5.6
Washington County, OR	3.1	6.5	4.4
Oregon State	3.7	7.6	5.2
Washington State	4.3	8.5	5.2
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

Competition

According to the June 30, 2022 FDIC Deposit Market Share Data, 31 financial institutions operate 416 full-service branches within the PVH MSA assessment area. Of these, Riverview ranked 10th, with a 1.7 percent deposit market share. The top four institutions consist of large, national banks that account for 68.3 percent of the total market share.

Community Contacts

Examiners reviewed recent community contacts with two organizations that serve the PVH Multistate MSA assessment area. The first contact, from a small business development center, noted there is a growing need for access to alternative capital funding in order to sustain small- to medium-sized businesses during the pandemic. The second contact from an affordable housing organization emphasized the growing need for affordable housing initiatives. The contact also identified a need for alternative products to assist individuals without access to banking services and flexible underwriting with credit qualifications for borrowers lacking sufficient credit history.

Credit and Community Development Needs and Opportunities

Considering the information from the community contacts, bank management, and demographic and economic data, examiners determined that bridge lending to small businesses and affordable housing lending, particularly assistance program loans, represent primary community credit needs in the assessment area. Area demographic and economic data indicate education and support for small businesses and community services to low- and moderate-income individuals and families represent primary community development needs in the assessment area.

SCOPE OF EVALUATION – PORTLAND-VANCOUVER-HILLSBORO MULTISTATE MSA

Refer to the overall Scope of Evaluation section.

CONCLUSIONS ON PERFORMANCE CRITERIA IN PORTLAND- VANCOUVER-HILLSBORO MULTISTATE MSA

LENDING TEST

Riverview is rated “Satisfactory” in the Lending Test in the PVH Multistate MSA. The performance under the Geographic Distribution and Borrower Profile criteria supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the PVH Multistate MSA assessment area. As shown in the following table, the level of small business lending exceeds demographic data in low- and moderate-income census tracts in 2019 and 2020. In 2021, although Riverview trailed demographics in low-income tracts, performance in moderate-income tracts well exceeded demographics.

Geographic Distribution of Small Business Loans					
Assessment Area: PVH Multistate MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	2.8	11	10.7	1,797	5.7
2020	2.7	28	3.8	3,957	3.8
2021	2.8	9	2.2	1,322	1.9
Moderate					
2019	22.2	35	34.0	10,659	33.6
2020	22.4	217	29.6	31,620	30.2
2021	22.6	130	31.4	27,881	40.5
Middle					
2019	38.0	39	37.9	13,712	43.2
2020	38.5	320	43.7	43,268	41.3
2021	38.3	177	42.8	23,047	33.5
Upper					
2019	34.4	18	17.5	5,584	17.6
2020	34.0	167	22.8	25,447	24.3
2021	34.1	97	23.4	16,336	23.8
Not Available					
2019	2.6	0	0.0	0	0.0
2020	2.4	1	0.1	500	0.5
2021	2.3	1	0.2	194	0.3
Totals					
2019	100.0	103	100.0	31,752	100.0
2020	100.0	733	100.0	104,792	100.0
2021	100.0	414	100.0	68,780	100.0
Source: 2019, 2020 & 2021 D&B, Data Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes in the PVH Multistate MSA assessment area. As shown in the following table, the lending to businesses with GARs of \$1 million or less significantly trailed demographic data. However, it is important to note that the small business loan data for 2020 and 2021 includes PPP loans originated in response to the needs of businesses during the pandemic. Banks originated these loans under federal programs and were not required to identify the revenues of the borrower; as such, a significant majority of the small business loans reflect revenue not available.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: PVH Multistate MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	88.9	36	35.0	10,027	31.6
2020	89.8	240	32.7	18,961	18.1
2021	90.6	257	62.1	22,056	32.1
>\$1,000,000					
2019	4.0	67	65.0	21,725	68.4
2020	3.5	269	36.7	73,188	69.8
2021	3.1	154	37.2	46,461	67.6
Revenue Not Available					
2019	7.1	0	0.0	0	0.0
2020	6.7	224	30.6	12,643	12.1
2021	6.3	3	0.7	263	0.4
Totals					
2019	100.0	103	100.0	31,752	100.0
2020	100.0	733	100.0	104,792	100.0
2021	100.0	414	100.0	68,780	100.0
Source: 2019, 2020 & 2021 D&B Data. Due to rounding, totals may not equal 100.0%					

Therefore, examiners also evaluated the PPP loans using loan size as a proxy for additional performance context on lending to small businesses. As shown in the following tables, a majority of 2020 and 2021 PPP loans, by number, had loan sizes of \$100,000 or less, indicating that the institution is helping to serve the needs of small businesses in the assessment area. The large amount of PPP loans with loan amounts less than \$100,000 reflects positively on the institution's performance and contributes to the conclusion of reasonable penetration among businesses of different sizes.

Distribution of PPP Loans by Loan Size (2020)				
Assessment Area: PVH Multistate MSA				
Loan Size	#	%	\$(000s)	%
< \$100,000	411	69.0	16,342	23.7
\$100,000 - \$249,999	110	18.5	17,649	25.6
\$250,000 - \$1,000,000	75	12.6	34,923	50.7
Total	596	100.0	68,914	100.0
Source: 1/1/2020 – 12/31/2020 Bank Data				

Distribution of PPP Loans by Loan Size (2021) Assessment Area: PVH Multistate MSA				
Loan Size	#	%	\$(000s)	%
< \$100,000	214	69.5	8,178	23.7
\$100,000 - \$249,999	55	17.9	8,759	25.4
\$250,000 - \$1,000,000	39	12.7	17,535	50.9
Total	308	100.0	34,472	100.0
<i>Source: 1/1/2021 – 12/31/2021 Bank Data</i>				

COMMUNITY DEVELOPMENT TEST

Riverview is rated Outstanding in the Community Development Test for the PVH Multistate MSA. Riverview demonstrated excellent responsiveness to the community development needs in the PVH Multistate MSA assessment area through community development loans, qualified investments, and community development services, considering the bank's capacity and resources.

Community Development Loans

The community development lending performance within the PVH Multistate MSA assessment area accounts for 67.5 percent by number and 85.6 percent by dollar volume of the overall lending. This performance represents an increase of 21.7 percent by number and a significant increase of 665.6 percent by dollar volume since the previous evaluation, when there were 46 community development loans totaling approximately \$10.0 million. The emphasis on revitalization and stabilization lending by dollar volume demonstrates responsiveness to a credit need identified by examiners.

Community Development Lending Assessment Area: PVH Multistate MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	7	262	2	700	-	-	1	3,780	10	4,742
2020	4	107	7	7,400	12	6,090	2	9,000	25	22,597
2021	5	1,016	2	1,200	6	2,261	3	16,426	16	20,903
YTD 2022	2	970	-	-	-	-	3	27,085	5	28,055
Total	18	2,355	11	9,300	18	8,351	9	56,291	56	76,297
Source: Bank Data										

Below are notable examples of community development lending in the assessment area.

- In 2022, Riverview funded a \$9.0 million loan to help construct a new commercial building in a moderate-income tract supporting job retention for low- and moderate-income individuals.
- In 2020, Riverview originated a \$2.6 million PPP loan to a business in a low-income geography, which assisted in providing payroll for multiple low- and moderate-income employees during the pandemic.
- In 2020, Riverview made a \$2.1 million loan that assisted in the operating expenses of a

non-profit mental health care organization that delivers critical services to low- and moderate-income individuals.

Qualified Investments

The qualified investments account for 89.7 percent by number and 59.6 percent by dollar volume of all qualified investments and donations made by the institution throughout the review period. This current level of performance represents a significant increase by dollar volume from the previous evaluation, when there were 266 donations totaling \$461,000 and no investments.

Qualified Investments										
Assessment Area: PVH Multistate MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021	2	10,976	-	-	-	-	-	-	2	10,976
YTD 2022	-	-	-	-	-	-	-	-	-	-
Subtotal	2	10,976	-	-	-	-	-	-	2	10,976
Qualified Grants & Donations	10	20	111	318	14	43	3	19	138	400
Total	12	10,996	111	318	14	43	3	19	140	11,376
<i>Source: Bank Data</i>										

Below are notable examples of qualified investment and donations in the assessment area.

- In 2021, Riverview purchased a \$6.8 million mortgage-backed security that supports affordable housing loans in low- and moderate-income geographies and to low- and moderate-income families.
- From 2019 to 2022, Riverview made five donations totaling \$41,400 to a local charity to raise funds for at-risk youth and to provide essential services to low- and moderate-income residents.
- From 2019 to 2022, Riverview provided five donations totaling \$21,500 to a non-profit organization to promote economic development of small businesses.

Community Development Services

Executive officers, senior managers, and staff personnel participated in 121 community development service activities totaling 1,753 hours; this accounts for 84.6 percent of the total community development service activities and 85.6 percent of the qualified service hours. This performance level represents a 57.1 percent increase by service activities but a 69.1 percent decrease by service hours since the previous evaluation, when there were 77 service activities and 5,667 service hours.

The lower service hours is partially due to the effects of the pandemic restrictions, as many service opportunities were limited. The community development service hours in the PVH Multistate MSA

assessment area account for a substantial majority of all the community development service hours performed in the institution's assessment areas.

Community Development Services Assessment Area: PVH Multistate MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	Hours	Hours	Hours	Hours	Hours
2019	7	856	9	89	961
2020	1	353	3	50	407
2021	1	362	3	3	369
YTD 2022	-	16	-	-	16
Total	9	1,587	15	142	1,753
<i>Source: Bank Data</i>					

Below are notable examples of community development services in the assessment area.

- From 2019 to 2021, a senior manager served on the Board of a non-profit organization that focuses on delivering critical support services to low- and moderate-income individuals.
- From 2019 to 2021, a senior manager delivered marketing expertise to a housing entity that specializes in affordable housing projects designed for low- and moderate-income individuals and families.
- In 2019 and 2020, an employee served on the Board of a local resource foundation that targets the revitalization and stabilization of moderate-income tracts.

WASHINGTON - Full-Scope Review

CRA RATING FOR WASHINGTON: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON

The evaluation for the Washington rated area considered the operations in Klickitat County, which comprises the Washington Non-MSA assessment area. Klickitat County is located in south central Washington bordering Oregon. The county is a large, sparsely populated, rural area that relies on agriculture to support the local economy.

Riverview operates two full-service branches in the Washington Non-MSA assessment area; one in an upper-income tract in White Salmon and another in a middle-income tract in Goldendale. Refer to the operations portion under the Description of Institution for a full discussion regarding operations and product offerings.

Economic and Demographic Data

According to the 2015 ACS, Washington Non-MSA assessment consists of two middle-income tracts and one upper-income tract.

Demographic Information of the Assessment Area						
Assessment Area: WA Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	20,820	0.0	0.0	62.8	37.2	0.0
Housing Units by Geography	9,894	0.0	0.0	62.7	37.3	0.0
Owner-Occupied Units by Geography	5,395	0.0	0.0	64.3	35.7	0.0
Occupied Rental Units by Geography	2,468	0.0	0.0	63.5	36.5	0.0
Vacant Units by Geography	2,031	0.0	0.0	57.5	42.5	0.0
Businesses by Geography	1,887	0.0	0.0	55.4	44.6	0.0
Farms by Geography	220	0.0	0.0	69.5	30.5	0.0
Family Distribution by Income Level	5,281	20.4	19.9	21.8	37.9	0.0
Household Distribution by Income Level	7,863	20.6	18.4	19.1	41.9	0.0
Median Family Income Non-MSAs - WA		\$58,240	Median Housing Value			\$222,761
			Median Gross Rent			\$834
			Families Below Poverty Level			10.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to 2021 D&B data, service industries represented the largest portion of businesses at 31.5 percent; followed by non-classifiable establishments at 17.6 percent; agriculture, forestry and fishing at 10.4 percent; and retail trade at 8.6 percent. D&B data also indicates the majority of businesses are very small. By number, 66.3 percent of businesses employ four or fewer employees and 91.4 percent operate from a single location. According to Washington Employment Security Department (ESD), the agriculture and forestry industry is a major employer in the county, averaging 1,255 jobs in 2021, which totals 17.0 percent of all jobs.

Unemployment rates for Klickitat County were higher than state and national averages during the review period with the exception of 2020. According to ESD, employment plunged in early 2019 due to cutbacks in the drone industry; layoffs at Insitu and its suppliers causing manufacturing jobs to fall 21.5 percent. Nonmanufacturing employment was growing until the pandemic, leading to layoffs in leisure and hospitality and K-12 education.

The following table depicts the U.S. Bureau of Labor Statistics average unemployment rates during the review period.

Unemployment Rates			
Area	2019	2020	2021
	%	%	%
Klickitat County	6.0	8.2	6.0
Washington State	4.3	8.5	5.2
National Average	3.7	8.1	5.3
<i>Source: Bureau of Labor Statistics</i>			

Competition

According to the June 30, 2022 FDIC Deposit Market Share Data, four financial institutions operate seven full-service branches within the WA Non-MSA assessment area. Of these, Riverview ranked 2nd, with a 33.2 percent deposit market share. The top institution is a large, regional bank operating two branches with 35.1 percent of the total market share.

Credit and Community Development Needs and Opportunities

Based on information obtained from bank management, and demographic and economic data, examiners identify affordable housing and economic development loans for start-up companies and small business owners as primary credit and community development needs. There is still significant poverty in the assessment area, and the median housing value is too high for low-and moderate-income families so affordable housing is a primary credit and community development need. In addition, economic development loans will help facilitate more middle-income jobs to help lower poverty. Due to the rural nature of the area, community services represent a secondary community development need in the assessment area.

SCOPE OF EVALUATION - WASHINGTON

Refer to the overall Scope of Evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON

LENDING TEST

Riverview Bank is rated Satisfactory in the Lending Test for Washington. The performance under the Borrower Profile criteria in the Washington Non-MSA assessment area supports this conclusion.

Geographic Distribution

The assessment area does not include any low- and moderate-income geographies, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, examiners did not evaluate this criterion.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes in the Washington Non-MSA assessment area. The lending to businesses with GARs of \$1 million or less significantly trailed 2020 and 2021 demographic data. Nonetheless, examiners noted a positive trend in the penetration level in 2021. Refer to the following table for additional details.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: WA Non-MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	84.3	0	0.0	0	0.0
2020	87.4	8	22.2	537	18.9
2021	87.5	12	70.6	339	51.2
>\$1,000,000					
2019	4.1	1	100.0	250	100.0
2020	3.1	9	25.0	1,484	52.3
2021	3.1	5	29.4	323	48.8
Revenue Not Available					
2019	11.6	0	0.0	0	0.0
2020	9.5	19	52.8	817	28.8
2021	9.4	0	0.0	0	0.0
Totals					
2019	100.0	1	100.0	250	100.0
2020	100.0	36	100.0	2,838	100.0
2021	100.0	17	100.0	662	100.0
Source: 2019, 2020 & 2021 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Examiners also evaluated the institution's 2020 and 2021 PPP loans using loan size as a proxy for additional performance context on lending to small businesses. As shown in the following tables, a substantial majority of 2020 and 2021 PPP loans, by number, had loan sizes of \$100,000 or less, indicating that the institution is helping to serve the needs of small businesses in the assessment area. The large amount of PPP loans with loan amounts less than \$100,000 reflects positively on the institution's performance and supports a reasonable performance.

Distribution of PPP Loans by Loan Size (2020)				
Assessment Area: WA Non-MSA				
Loan Size	#	%	\$(000s)	%
< \$100,000	27	84.4	988	44.5
\$100,000 - \$249,999	3	9.4	409	18.4
\$250,000 - \$1,000,000	2	6.3	825	37.1
Total	32	100.0	2,222	100.0
Source: 1/1/2020 – 12/31/2020 Bank Data				

Distribution of PPP Loans by Loan Size (2021) Assessment Area: WA Non-MSA				
Loan Size	#	%	\$(000s)	%
< \$100,000	13	86.7	304	53.1
\$100,000 - \$249,999	2	13.3	269	46.9
\$250,000 - \$1,000,000	0	0.0	0	0.0
Total	15	100.0	573	100.0

Source: 1/1/2021 – 12/31/2021 Bank Data

COMMUNITY DEVELOPMENT TEST

Riverview is rated Satisfactory in the Community Development Test for the state of Washington.

Riverview demonstrated adequate responsiveness to the community development needs in Washington Non-MSA assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the availability and need of such opportunities for community development within the assessment area.

Community Development Loans

Community development lending performance accounts for 6.0 percent by number and 0.5 percent by dollar volume of all the institution's community development lending. Riverview's community development lending within the assessment area focused on community service initiatives. The performance level represents an increase of 150.0 percent by number and 51.1 percent by dollar volume since the previous evaluation, when there were two community development loans totaling \$278,000.

Community Development Lending Assessment Area: WA Non-MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	-	-	1	50	-	-	-	-	1	50
2020	-	-	1	50	--	-	-	--	1	50
2021	-	-	2	270		-	-	-	2	270
YTD 2022	-	-	1	50	-	-	-	-	1	50
Total	-	-	5	420	-	-	-	-	5	420

Source: Bank Data

Below is a notable example of community development lending in the assessment area:

- In 2021, Riverview funded two loans totaling \$270,000 to a non-profit entity that provides emergency shelter assistance to homeless individuals.

Qualified Investments

The qualified investment for \$364,000 and 3 donations for \$1,554 account for 2.6 percent by number and 1.9 percent by dollar volume of all qualified investments and donations made by the institution throughout the review period. The current performance level represents a decrease by

number but a significant increase by dollar from the previous evaluation, when there were 15 donations totaling \$4,000 and no investments.

Qualified Investments Assessment Area: WA Non-MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021	-	-	-	-	-	-	-	-	-	-
YTD 2022	1	364	-	-	-	-	--	-	1	364
Subtotal	1	364			--	-	-	-	1	364
Qualified Grants & Donations	-	-	3	2	-	-	-	-	3	2
Total	1	364	3	2	-	-	-	-	4	366
<i>Source: Bank Data</i>										

The following is an example of an investment that benefited the assessment area:

- The institution continues to hold a prior period investment with a current book value of \$364,000. The investment is a mortgage-backed security that supports affordable housing to low- and moderate-income individuals and in low- and moderate-income geographies within the assessment area.

Community Development Services

Branch office personnel participated in 18 qualified community development service activities totaling 284 hours. This performance level accounts for 12.6 percent of the total service activities and 13.9 percent of service hours. This level is a 63.6 percent increase by service activity number but a 69.4 percent decrease by service hours since the previous evaluation, when there were 11 service activities and 928 service hours.

The service hour reduction in 2020 and 2021 can be ascribed to the effects of the pandemic, as many service opportunities were either limited or non-existent. The community development service hours account for a minor number of all the community development service hours performed in the institution's assessment areas.

The majority of community development service hours were related to employees serving on the Boards of a housing development agency and several community service groups that serve low- and moderate-income individuals and families.

Community Development Services Assessment Area: WA Non-MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	Hours	Hours	Hours	Hours	Hours
2019	21	122	15		158
2020	23	46	9	--	78
2021	6	42	-	-	48
YTD 2022	-	-	-	-	-
Total	50	210	24	-	284
<i>Source: Bank Data</i>					

OREGON - Full-Scope Review

CRA RATING FOR OREGON: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OREGON

The evaluation for the Oregon rated area considered the operations in Marion County, Oregon. Marion County is a portion of the Salem MSA. Riverview operates a full-service branch office in a middle-income tract in Aumsville, which is a rural area with a mostly agriculture base.

Economic and Demographic Data

According to the 2015 ACS, the Salem MSA assessment area includes 58 census tracts consisting of 2 low-income tracts, 13 moderate-income tracts, 27 middle-income tracts, 16 upper-income tracts, and no census tract with no income designation.

Demographic Information of the Assessment Area						
Assessment Area: Salem MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	3.4	22.4	46.6	27.6	0.0
Population by Geography	323,259	3.1	27.1	45.4	24.4	0.0
Housing Units by Geography	122,315	3.0	24.9	45.9	26.2	0.0
Owner-Occupied Units by Geography	68,134	1.3	17.2	50.9	30.6	0.0
Occupied Rental Units by Geography	45,862	5.4	35.1	39.1	20.4	0.0
Vacant Units by Geography	8,319	4.0	31.4	42.5	22.1	0.0
Businesses by Geography	32,826	3.1	24.3	41.3	31.3	0.0
Farms by Geography	1,967	1.3	13.8	44.9	40.0	0.0
Family Distribution by Income Level	78,914	22.4	17.9	20.2	39.5	0.0
Household Distribution by Income Level	113,996	23.4	16.8	19.4	40.3	0.0
Median Family Income MSA - 41420 Salem, OR MSA		\$58,033	Median Housing Value			\$191,525
			Median Gross Rent			\$812
			Families Below Poverty Level			14.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to 2021 D&B data, service industries represented the largest portion of businesses at 35.1 percent; followed by non-classifiable establishments at 19.4 percent; retail trade at 11.0 percent; construction at 9.3 percent; and finance, insurance and real estate at 8.8 percent. D&B data also indicates the majority of business are very small. By number, 64.7 percent of businesses

employ four or fewer employees and 92.0 percent operate from a single location. In addition, Moody's data indicates the cost of operating a business in the assessment area is below national averages.

According to Moody's Analytics as of July 2022, the Salem MSA assessment area is at risk as employment has decreased even as national employment continues to grow. After recovering jobs from the pandemic, most industries have backtracked in 2022. The weaker local government is still missing almost half of its pandemic-related job losses.,. Farm income has risen substantially in the metro area since early 2021.

The top five employers in the assessment area are Salem Hospital, SuperMedia LLC, Association of Salem Keizer Education Support, Fred Meyer Stores, and Spirit Mountain Casino.

According to the U.S. Bureau of Labor and Statistics, the unemployment rates in the Salem MSA assessment area are comparable to the state and national average rates during the review period.

Unemployment Rates			
Area	2019	2020	2021
	%	%	%
Marion County	3.9	7.0	5.1
Oregon State	3.7	7.6	5.2
National Average	3.7	8.1	5.3
Source: Bureau of Labor Statistics			

Competition

According to the June 30, 2022 FDIC Deposit Market Share Data, 14 financial institutions operate 55 full-service branches within the Salem MSA assessment area. Of these, Riverview ranked 14th, with a 0.5 percent deposit market share. The top four institutions consist of large national and regional banks that account for 65.1 percent of the total market share.

Credit and Community Development Needs and Opportunities

Based on information obtained from bank management, and demographic and economic data, examiners identify affordable housing and economic development loans for start-up companies and small business owners as primary credit and community development needs.

SCOPE OF EVALUATION - OREGON

Refer to the overall Scope of Evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON

LENDING TEST

Riverview is rated Satisfactory in the Lending Test for Oregon. The performance under the Geographic Distribution and Borrower Profile criteria in the Salem MSA assessment area supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Salem MSA assessment area. Riverview did not originate any small business loans in low-income tracts during the review period. Additionally, Riverview did not originate any small business loans in moderate-income tracts in 2019 nor in 2021. Despite limited lending during the review period, lending performance in moderate-income tracts exceeded demographic in 2020. Given performance context, the performance level is reasonable as the assessment area is mostly agricultural driven, coupled with limited product line offerings and the institution's remote branch location. In addition, the evaluation does not compare the bank data directly to aggregate data; however, the 2020 aggregate small business lending data shows the performance level of 23.8 percent in moderate-income tracts. In light of performance context, the geographic distribution reflects reasonable dispersion during the review period.

Geographic Distribution of Small Business Loans					
Assessment Area: Salem MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	3.1	0	0.0	0	0.0
2020	3.1	0	0.0	0	0.0
2021	3.1	0	0.0	0	0.0
Moderate					
2019	23.9	0	0.0	0	0.0
2020	24.3	4	30.8	362	41.0
2021	24.3	0	0.0	0	0.0
Middle					
2019	41.3	0	0.0	0	0.0
2020	40.9	6	46.2	198	22.4
2021	41.3	5	100.0	324	100.0
Upper					
2019	31.7	0	0.0	0	0.0
2020	31.7	3	23.1	322	36.5
2021	31.3	0	0.0	0	0.0
Not Available					
2019	0.0	0	0.0	0	0.0
2020	0.0	0	0.0	0	0.0
2021	0.0	0	0.0	0	0.0
Totals					
2019	100.0	0	0.0	0	0.0
2020	100.0	13	100.0	882	100.0
2021	100.0	5	100.0	324	100.0
Source: 2019, 2020 & 2021 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes in the Salem MSA assessment area. The lending to business with GARs of \$1 million or less significantly trailed demographic data during the review period. Refer to the following table.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Assessment Area: Salem MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	86.9	0	0.0	0	0.0
2020	87.4	5	38.5	658	74.6
2021	88.9	4	80.0	309	95.4
>\$1,000,000					
2019	3.8	0	0.0	0	0.0
2020	3.6	2	15.4	72	8.2
2021	3.1	1	20.0	15	4.6
Revenue Not Available					
2019	9.2	0	0.0	0	0.0
2020	9.1	6	46.2	152	17.2
2021	8.1	0	0.0	0	0.0
Totals					
2019	100.0	0	0.0	0	0.0
2020	100.0	13	100.0	882	100.0
2021	100.0	5	100.0	324	100.0
Source: 2019, 2020 & 2021 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Examiners also evaluated the institution's 2020 and 2021 PPP loans made within the assessment area using loan size as a proxy for additional performance context on lending to small businesses. As shown in the following tables, all of the institution's 2020 and 2021 PPP loans, by number, had loan sizes of \$100,000 or less, indicating that the institution is helping to serve the needs of small businesses in the assessment area. The percentage of PPP loans with loan amounts less than \$100,000 reflects positively on the institution's performance and contributes to the conclusion of reasonable penetration among businesses of different sizes.

Distribution of PPP Loans by Loan Size (2020)				
Assessment Area: Salem MSA				
Loan Size	#	%	\$(000s)	%
< \$100,000	11	100.0	347	100.0
\$100,000 - \$249,999	0	0.0	0	0.0
\$250,000 - \$1,000,000	0	0.0	0	0.0
Total	11	100.0	347	100.0
Source: 1/1/2020 – 12/31/2020 Bank Data				

Distribution of PPP Loans by Loan Size (2021) Assessment Area: Salem MSA				
Loan Size	#	%	\$(000s)	%
< \$100,000	4	100.0	164	100.0
\$100,000 - \$249,999	0	0.0	0	0.0
\$250,000 - \$1,000,000	0	0.0	0	0.0
Total	4	100.0	164	100.0

Source: 1/1/2021 – 12/31/2021 Bank Data

COMMUNITY DEVELOPMENT TEST

Riverview is rated Satisfactory in the Community Development Test for Oregon. Community development lending performance demonstrates adequate responsiveness to the community development needs in the Salem MSA assessment area through community development loans, qualified investments, and community development services.

Community Development Loans

The community development lending performance accounts for 3.6 percent by number and 0.4 percent by dollar volume of all the institution's community development lending. The performance level represents a significant increase by both number and dollar volume since the previous evaluation, when there was a \$20,000 community development loan. Management focused on affordable housing lending, which demonstrates responsiveness to an identified credit need.

Community Development Lending Assessment Area: Salem MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	-	-	-	-	-	-	-	-	-	-
2020	1	20	-	-	-	-	-	-	1	20
2021	1	37	-	-	--	-	-	-	1	37
YTD 2022	1	264	-	-		-	-	-	1	264
Total	3	321	-	-	-	-	-	-	3	321
Source: Bank Data										

Below are notable examples of community development lending in the assessment area.

- In 2022, Riverview funded a \$264,000 loan to help in the development of new affordable housing projects for low- and moderate-income families and individuals.
- In 2021, Riverview originated a \$37,000 loan for the construction of affordable housing units for low- and moderate-income individuals and families.

Qualified Investments

Qualified investments and donations account for 3.8 percent by number and 12.1 percent by dollar volume of all qualified investments and donations made throughout the review period. Although the current level of performance represents a slight decrease by number, this level is a significant

increase by dollar volume from the previous evaluation, when there were seven donations totaling \$5,000 and no investments.

Qualified Investments Assessment Area: Salem MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	-	-	-	-	-	-	-	-
2021				-	-	-	-	-	-	-
YTD 2022	2	2,297		-	-	-	-	-	2	2,297
Subtotal	2	2,297	-	-	-	--	-	-	2	2,297
Qualified Grants & Donations	-	-	4	6	-	-	--	--	4	6
Total	2	2,297	4	6	-	-	-	-	6	2,303
<i>Source: Bank Data</i>										

Below is a notable example of qualified investment in the assessment area.

- In 2022, Riverview purchased a \$1.5 million mortgage-backed security that supports affordable housing loans in low- and moderate-income geographies and to low- and moderate-income families.

Community Development Services

Branch office personnel participated in 4 qualified community development service activities totaling 11 service hours, which accounts for 2.8 percent of the total community development service activities and 0.5 percent of the qualified service hours. This performance level is a 33.3 percent increase by service activity number but a 97.5 percent decrease by qualified service hours since the previous evaluation, when there were 3 community development service activities and 435 qualified service hours. The performance level decreased due to either limited opportunities or obsolete services because of the pandemic mandates.

Community Development Services Assessment Area: Salem MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	Hours	Hours	Hours	Hours	Hours
2019	-	2	8	-	10
2020	-	1	-	-	1
2021	-	-	-	-	-
YTD 2022	-	-	-	-	-
Total	-	3	8	-	11
<i>Source: Bank Data</i>					

The following is an example of a community development service provided by bank employees within the assessment area during the evaluation period:

- In 2019, a bank employee provided eight hours instructing classes for a local economic development organization that provides services to small businesses in the area.

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 geographic distribution of the bank's loans;
- 4) 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; 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 community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
PVH Multistate MSA	Satisfactory	Outstanding	Satisfactory
Washington	Satisfactory	Satisfactory	Satisfactory
Oregon	Satisfactory	Satisfactory	Satisfactory

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

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

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

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

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

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

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

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

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

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

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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.