

PUBLIC DISCLOSURE

February 17, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Brighton Bank
Certificate Number: 22578

7101 South Highland Drive
Salt Lake City, Utah 84121

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

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San Francisco, California 94105

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

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

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

- The loan-to-deposit (LTD) ratio is reasonable considering seasonal variations and taking into account lending-related activities given the institution's size, financial condition, and AA credit needs.
- A majority of small business loans are in the institution's AA.
- The geographic distribution of small business loans reflects excellent dispersion throughout the AA.
- The distribution of borrowers reflects, given the demographics of the AA, poor penetration among businesses of different revenue sizes.
- The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

Brighton Bank (BB) is a commercial bank headquartered in Salt Lake City, Utah. The bank is wholly-owned by Brighton Bancorp, a one-bank holding company also located in Salt Lake City. BB received a rating of “Satisfactory” at the previous FDIC CRA performance evaluation dated May 4, 2020, based on Interagency Small Institution Examination Procedures.

In addition to the main office, BB operates four full-service branches located throughout Salt Lake County. One of those four branches is new since the prior CRA performance evaluation, having opened in Draper in October 2022. The bank has four branches located in middle-income census tracts and one branch located in a moderate-income census tract. The Draper branch is the only new branch and no branches have been closed since the prior CRA performance evaluation. Additionally, the bank has not been involved in any mergers or acquisitions since the previous evaluation.

BB offers a variety consumer and commercial loan products including residential and commercial real estate, home equity and working capital lines of credit, construction, automobile and boat, and SBA loans. BB’s deposit services include consumer and business checking, savings, and money market accounts, and certificates of deposit. Additionally, BB offers retail banking services including ATMs, online banking, and mobile banking.

According to December 31, 2025 Reports of Condition and Income, the bank had \$317.1 million in total assets, \$215.5 million in total loans, and \$274.6 in total deposits. Refer to the table below for details of the bank’s loan portfolio.

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	33,277	15.4
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	36,622	17.0
Secured by Multifamily (5 or more) Residential Properties	19,609	9.1
Secured by Nonfarm Nonresidential Properties	111,013	51.5
Total Real Estate Loans	200,521	93.1
Commercial and Industrial Loans	15,057	7.0
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	804	0.3
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	920	0.4
Total Loans	215,467	100.0
<i>Source: December 31, 2025 Reports of Condition and Income</i>		

BB is not involved in any financial, legal, or other impediments that would limit the institution’s ability to meet the credit needs of its AA.

DESCRIPTION OF ASSESSMENT AREA

The bank's AA has not changed since the previous CRA performance evaluation. BB's AA is the entirety of Salt Lake County, which is part of the Salt Lake City, Utah Metropolitan Statistical Area. While there have been no changes to the AA delineation since the prior evaluation, there were census updates provided by the 2020 U.S Census.

To conduct the current evaluation, examiners relied on institution records, information obtained from an existing community contact from the FFIEC database, and publicly available information including financial and demographic data from the 2020 U.S. Census and 2025 Dun and Bradstreet (D&B) data.

Economic and Demographic Data

The following table provides select demographic characteristics of the AA using the 2020 U.S. Census and 2025 D&B Data.

Demographic Information of the Assessment Area Salt Lake County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	251	2.0	22.3	45.8	28.3	1.6
Population by Geography	1,185,238	2.0	22.4	46.4	28.6	0.6
Housing Units by Geography	404,550	1.8	24.2	46.3	27.7	0.1
Owner-Occupied Units by Geography	258,905	0.7	17.9	47.6	33.9	0.0
Occupied Rental Units by Geography	124,419	4.0	36.4	44.6	14.7	0.2
Vacant Units by Geography	21,226	3.4	29.1	39.8	27.7	0.0
Businesses by Geography	222,568	2.6	16.4	43.9	34.5	2.6
Farms by Geography	1,692	1.3	14.0	40.7	41.0	3.0
Family Distribution by Income Level	265,385	17.9	19.2	23.4	39.7	0.0
Household Distribution by Income Level	383,324	21.1	17.3	20.4	41.2	0.0
Median Family Income MSA - 41620 Salt Lake City-Murray, UT MSA		\$90,360	Median Housing Value			\$ 347,355
			Median Gross Rent			\$1,180
			Families Below Poverty Level			5.6%
Source: 2020 Census And 2025 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

According to 2025 D&B data, the principal industries by number of businesses include nonclassifiable establishments; professional, scientific, and technical services; and administrative, waste management, and remediation services. Additionally, according to Moody's Analytics, the top employers in the Salt Lake City MSA include University of Utah, Intermountain Health Care

Inc., and Amazon Fulfillment Services. According to the Bureau of Labor Statistics the unemployment rate for Salt Lake County was 3.4 percent as of December 2025 which is lower compared to the statewide and national rates of 3.6 and 4.4 percent respectively.

Competition

The AA is highly competitive. According to FDIC Deposit Market Share data as of June 30, 2025, 52 institutions operate 201 branches within the AA. Of the 52 institutions, BB ranked 34th with a .03 percent deposit market share. Examiners noted that market share data does not include information regarding credit unions, national mortgage lenders, or financial institutions that do not have a physical presence in the area but are able to lend through online portals.

Community Contacts

Examiners used a recent community contact interview from an organization that focuses on economic and small business development in Salt Lake County. The contact noted that the region is economically competitive; however, limitations on the county's economic growth include land constraints as well as a lack of housing availability and affordability. The contact also noted that small businesses, especially those just starting up, have a difficult time getting permanent financing primarily because of high down payments and initial cash needs. Lastly, the contact described opportunities for local financial institutions to meet the credit and community development needs of the area which included helping small businesses to obtain permanent financing and meet down payment and startup cash needs.

Credit Needs

Based on economic and demographic data, discussions with bank management, and information from the community contact, examiners determined that small business lending and affordable housing are the primary credit needs of the AA.

SCOPE OF EVALUATION

General Information

Examiners used the Interagency Small Institution Examination Procedures to evaluate BB's CRA performance. The evaluation ranges from the prior evaluation dated May 4, 2020, to the current evaluation dated February 17, 2026. Examiners conducted a full-scope review for the bank's AA.

Activities Reviewed

Examiners used the bank's loan download to select the products to be analyzed. Examiners selected small business loans as the bank's major product line based on BB's business strategy and lending volume. In 2025, the bank originated a limited number of home mortgage loans by dollar volume and number of loans. Further, BB did not originate any small farm loans in 2025. Thus, examiners did not include home mortgage or small farm loans in the scope of evaluation.

Given that BB neither collects nor reports CRA or HMDA loan data, examiners analyzed and presented the bank's lending activities for 2025 only. Examiners confirmed with bank management that the institution's 2025 lending was representative of the bank's lending performance for all years during the evaluation period.

BB originated or renewed 55 small business loans in 2025 totaling \$16.1 million. Examiners used the universe of small business loans to analyze the AA concentration and considered all small business loans inside the AA to analyze the geographic distribution and borrower profile.

The 2025 D&B data provided the standard of comparison for the small business loans in the analyses of the geographic distribution and borrower profile of loans in the institution's AA. The D&B data is based on geographic location using the 2020 U.S. Census data boundaries for the total number of businesses within the AA and the reported gross annual revenues of those businesses.

While the number and dollar volume of loan products are both presented, greater weight was given to lending performance by number because it is a better indicator of the number of businesses served in the community. The conclusions presented in the Lending Test section are appropriate for the entire review period.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

BB demonstrated satisfactory performance under the lending test. The bank's reasonable LTD, a majority of loans originated in the AA, excellent dispersion of small business loans throughout the AA, and poor penetration among businesses of different revenues sizes support this conclusion.

Loan-to-Deposit Ratio

BB's average net LTD ratio is reasonable given the institution's size, financial condition, and AA credit needs. The bank's average net LTD ratio, calculated from Call Report data, averaged 72.6 percent over the previous 22 calendar quarters, from September 30, 2019 through December 31, 2025. The quarter with the lowest net LTD ratio was September 30, 2021 at 58.6 percent and the quarter with the highest ratio was March 31, 2025 at 81.7 percent. The bank's net LTD ratio increased from the prior performance evaluation when it was 63.8 percent.

Examiners identified three similarly-situated institutions that operate in and serve economic and geographic areas similar to BB's AA. These institutions were selected based on asset size, product offerings, and loan portfolio composition. BB's average net LTD is lower than all three institutions' average net LTD ratios over the same 22 quarters. However, BB's LTD ratio is still comparable to similarly-situated institutions #1 and #3, and has been growing consistently over most quarters since the prior performance evaluation, therefore BB's average net LTD ratio is reasonable.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 12/31/2025 (\$000s)	Average Net LTD Ratio (%)
Brighton Bank	317,062	72.6
Similarly-Situated Institution #1	72,205	78.5
Similarly-Situated Institution #2	112,990	116.6
Similarly-Situated Institution #3	845,540	85.4
<i>Source: Reports of Condition and Income 09/30/2020 - 12/31/2025</i>		

Assessment Area Concentration

The bank made a majority of small business loans by number and dollar amount within the bank's AA, as shown in the table below.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2025	44	80.0	11	20.0	55	11,928	74.0	4,201	26.0	16,129
Source: Bank Data, as reported Due to rounding, totals may not equal 100.0%.										

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the AA. As shown in the following table, the bank's performance of small business loans originated in moderate-income census tracts was consistent with the percentage of businesses located in those census tracts. Additionally, the bank's performance in low-income census tracts significantly exceeded the percentage of businesses located in low-income census tracts. Given that only 2.6 percent of businesses are located in the low-income census tracts and it is generally more difficult to lend in low-income areas; therefore, the bank significantly exceeding the 2.6 percent distribution reflects excellent dispersion.

Geographic Distribution of Small Business Loans Salt Lake County					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2025	2.6	8	18.2	1,399	11.7
Moderate					
2025	16.4	7	15.9	1,946	16.3
Middle					
2025	43.9	19	43.2	6,069	50.9
Upper					
2025	34.5	10	22.7	2,514	21.1
NA					
2025	2.6	0	0.0	0	0.0
Total					
2025	100.0	44	100.0	11,928	100.0
Source: 2025 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.					

Borrower Profile

The distribution of small business loans reflects, given the demographics of the AA, poor penetration to businesses of different revenue sizes. As shown in the following table, BB's distribution of small business loans to businesses with gross annual revenues of \$1 million or less was significantly lower than demographic data.

Distribution of Small Business Loans by Gross Annual Revenue Category Salt Lake County					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2025	92.2	23	52.3	5,623	47.1
> \$1,000,000					
2025	2.0	21	47.7	6,305	52.9
Revenue Not Available					
2025	5.8	0	0.0	0	0.0
Total					
2025	100.0	44	100.0	11,928	100.0
Source: 2025 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.					

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

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).

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.

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

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