



PUBLIC DISCLOSURE

January 25, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank of Ohio
Charter Number 700041

140 North Columbus Street
Galion, OH 44833-1909

Office of the Comptroller of the Currency

West Lake Center
4555 Lake Forest Drive, Suite 520
Blue Ash, OH 45242-3760

NOTE: 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, and should not 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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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test is based on the State of Ohio rating, which is Satisfactory. The bank exhibits an excellent distribution of loans to individuals of different income levels. The bank's geographic distribution of loans is reasonable.
- Additionally, the bank's performance relative to the activities considered at the bank-wide level is overall satisfactory. This includes:
 - The bank's Loan to Deposit (LTD) ratio is reasonable.
 - A substantial majority of the bank's loans are inside the assessment areas (AAs).

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan to-deposit ratio is reasonable.

The bank's 18 quarter average loan-to-deposit (LTD) ratio for the period ended September 30, 2020 was 52.88 percent with a range of 51.13 percent (March 31, 2017) to 57.27 percent (September 30, 2020) during this period. This is a decrease from 54.32 percent noted at the previous evaluation.

The OCC compared First Federal's LTD ratio to six similarly situated financial institutions operating in North Central Ohio with total assets between \$53 million and \$285 million. First Federal's LTD ratio was consistently lower than the peer group. The quarterly average LTD ratio for these institutions was 86.99 percent with a range of 49.10 percent to 110.02 percent. First Federal's ratio is lower than the peer average because First Federal continues to sell loans in the secondary market while many of the peer banks retain all loans in the portfolio. Throughout the review period, which includes the last three quarters of financial data from 2016 and all financial data through year-end 2020, the bank originated and sold 775 loans (\$87.4 million) to Fannie Mae while retaining the servicing. Loans sold to Fannie Mae comprise 50.4 percent of all loans originated over the review period. The bank continues to service all of these loans; however, they are not considered in the LTD ratio. Management has made efforts to increase the LTD ratio through facilitating different Federal program offerings, but only retains certain loans in house due to potential increased risk. While management has had success in increasing loan growth, this has been paired with significant deposit growth, leading to a minimal impact in the LTD ratio. Another factor affecting the ratio is the heightened competition from other larger financial institutions located in the assessment area.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area (AA).

The bank originated or purchased 92.7 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage

does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	229	92.3	19	7.7	248	21,235	91.1	2,065	8.9	23,300
2019	226	93.0	17	7.0	243	23,810	87.7	3,345	12.3	27,155
Subtotal	455	92.7	36	7.3	491	45,045	89.3	5,410	10.7	50,455
Total	455	92.7	36	7.3	491	45,045	89.3	5,410	10.7	50,455
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

First Federal Bank of Ohio (First Federal) is a federally chartered mutual thrift operating seven full-service branches and two limited services branches in North Central Ohio. In addition to the main branch located in Galion, Ohio, First Federal operates full-service branches in downtown Mansfield, south Mansfield, Shelby, Mt. Gilead, Cardington, and Sandusky, Ohio. First Federal also operates a limited-service branch in Galion, OH and a loan origination office located in Tiffin, Ohio.

As of September 30, 2020, the bank reported total assets of \$248 million. The bank offers a full range of insured deposit products consisting of savings accounts, certificates of deposits, health savings accounts, checking accounts, and individual retirement accounts. In addition, First Federal offers a wide variety of loans including commercial (including Small Business Association), commercial real estate (CRE), land, commercial construction, various types of consumer loans, and residential real estate loans. Residential real estate loan products include purchase, refinance, home improvement, and construction of one-to-four family and multi-family dwellings at fixed and adjustable rates. Other services offered include debit cards, online banking, online bill pay, wire transfers, and safe deposit boxes.

There are no financial, legal, or other factors that impede the bank's ability to serve the credit needs of its community. First Federal received a satisfactory CRA rating from the prior CRA evaluation dated August 19, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted a full-scope CRA evaluation to assess the bank's record of meeting the credit needs of its entire community, including low- and moderate- income (LMI) individuals. The OCC used the small bank CRA evaluation procedures to assess the bank's performance. Based on reviews of loan production reports and call report data, the OCC determined that home mortgage loans are the bank's primary lending product. The OCC analyzed lending activity in full-year increments during the evaluation period January 1, 2017 through December 31, 2019. Refer to the table in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs in that state was selected for a full-scope review. First Federal has three AAs in State of Ohio and the OCC completed a full-scope review for each AA. Refer to the "Scope" section under each State Rating for details regarding how the full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank is active only in the state of Ohio, and the rating is based on activities in the three AAs in Ohio. The OCC placed more weight on home mortgage lending given that this is the bank's primary product.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Ohio

CRA rating for the State of Ohio¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- First Federal's lending activities reflect an excellent penetration among borrowers of different incomes.
- First Federal's lending activities reflect a reasonable geographic distribution.

Description of Institution's Operations in Ohio

The bank's rating area consists of three assessment areas (AAs). The Columbus, Ohio MSA #18140 includes all of Morrow County; the Mansfield, Ohio MSA #31900 includes all of Richland County; and a non-MSA AA includes Crawford, Erie, Huron, Sandusky, and Seneca Counties. The majority of the bank's lending occurs in the non-MSA AA. The main branch in Galion, Ohio is located in a middle income tract.

Columbus, Ohio MSA AA

This AA encompasses the entirety of Mansfield Morrow County. Morrow County has a total of six Census Tracts (CTs). All six CTs are considered middle income tracts. There have been no changes in CTs during the three-year evaluation period of 2017-2019.

Economic conditions in Morrow County are stable. As of October 2020, per the U.S. Bureau of Labor Statistics (BLS), Morrow County had an unemployment rate of 4.7 percent. The unemployment rate increased to a high of 16.1 percent in April 2020, but the current unemployment rate (4.7 percent) compares to 4.8 percent at October 2016 and 4.3 percent at October 2017 and 2018. The population of Morrow County has remained stable. During the evaluation period, the total population of the AA totaled 34,996 individuals and 12,700 households. Primary employment sectors include services and retail trade.

Competition in Morrow County is moderate and primarily includes large banks and large community banks. According to the June 30, 2020 Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, compared with five competitors, First Federal was ranked third in total deposit market share for Morrow County with \$44.0 million or 18.05 percent of deposits. The top two institutions consisted of larger institutions Park National Bank and Chase. Combined, their deposit market share totaled 54.5 percent.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

According to the American Community Survey (ACS) data, the median housing value in the AA was \$131,679 and the median family income was \$63,278. In 2019, there were 14,123 housing units in the AA. 11,718 of these are 1-4 family units. 72.92 percent are owner-occupied and 17.01% are rental occupied units.

Mansfield, Ohio MSA AA

The Mansfield, Ohio AA encompasses the entirety of Richfield County. Richfield County has a total of 30 CTs. Two CTs (6.67 percent) are considered low-income; seven CTs (23.33 percent) are moderate income; 16 CTs (53.33 percent) are middle income; and five CTs (16.67 percent) are considered upper income. There have been no changes in CTs during the three-year evaluation period of 2017-2019.

Economic conditions remain stable. As of October 2020, per the U.S. Bureau of Labor Statistics (BLS), Morrow County had an unemployment rate of 5.8 percent. The unemployment rate is up slightly from previous years, but has declined from a spike to 20.3 percent in April 2020. The population of Richland County has remained stable. During the evaluation period, the total population of the AA totaled 122,312 individuals and 48,103 households. Primary employment sectors include services and retail trade.

Competition in Richland County is moderate. According to the June 30, 2020 FDIC Deposit Market Share Report, compared with 13 competitors, First Federal was ranked eighth in total deposits market share for Richland County with \$63.2 million or 2.93 percent of deposits. The top three competitors, which combined total 66.46 percent of deposit market share, consist of larger institutions including The Park National Bank, Mechanics Bank, and Chase.

According to the American Community Survey (ACS) data, the median housing value in the AA was \$98,415 and the median family income was \$54,903. In 2019, there were 54,353 housing units in the AA. 46,992 of these are 1-4 family units. 60.72 percent are owner-occupied. Rental units account for 29.12 percent of housing units in the county.

Non-MSA AA

The Non-MSA AA consists of Crawford, Erie, Huron, Sandusky, and Seneca Counties. There is a total of 74 CTs within the AA.

In 2017-2018, no CTs were considered low-income; 15 CTs (20.27 percent) were considered moderate-income; 45 CTs (60.81 percent) were considered middle income; 13 CTs (17.57 percent) were considered upper income; and one CT was listed as n/a. In 2019, the distribution of CTs changed to no low income CTs; 15 moderate-income CTs (20.27 percent), 44 middle-income CTs (59.46 percent), 14 upper-income CTs (18.92 percent), and 1 n/a (1.35 percent). The change comes from CT #9631 within Seneca County which was reported as middle-income in 2017 and 2018, but changed to upper income in 2019.

As of October 2020, per the U.S. Bureau of Labor Statistics (BLS), Crawford County had an unemployment rate of 5.7 percent; Erie County had an unemployment rate of 6.9 percent; Huron County had an unemployment rate of 5.4 percent; Sandusky County had an unemployment rate of 5.8 percent; and Seneca County had an employment rate of 5.1 percent. Crawford and Erie Counties had lower unemployment rates in 2020 compared to 2018 and 2019. Huron, Sandusky, and Seneca Counties

experienced an increase in the unemployment rate. The population of the AA has remained stable. Primary employment sectors include services and retail trade.

Competition in this AA is moderate. According to the June 30, 2020 FDIC Deposit Market Share Report, compared with 23 competitors, First Federal was ranked seventeenth in total deposits mark share with \$87.3 million or 1.47 percent of deposits. The top three competitors, which combined represent 36.10 percent of deposit market share include Civista Bank, The Croghan Colonial Bank, and Sutton Bank.

According to the American Community Survey (ACS) data, the median housing value in the AA was \$113,217 and the median family income was \$57,636. In 2019, there were 133,141 housing units in the AA. The majority (87.26 percent) are 1-4 family houses. Rental units represent 28.32 percent of the housing units in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Combined						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	110	1.8	20.0	60.9	16.4	0.9
Population by Geography	451,227	1.1	16.1	64.1	18.7	0.0
Housing Units by Geography	201,617	1.3	17.5	62.5	18.7	0.0
Owner-Occupied Units by Geography	126,118	0.6	12.8	65.1	21.5	0.0
Occupied Rental Units by Geography	51,941	2.5	27.0	58.5	12.0	0.0
Vacant Units by Geography	23,558	2.7	21.8	57.3	18.2	0.0
Businesses by Geography	22,779	2.6	16.0	59.6	21.9	0.0
Farms by Geography	1,792	0.2	4.6	69.4	25.8	0.0
Family Distribution by Income Level	117,776	19.6	18.6	21.8	39.9	0.0
Household Distribution by Income Level	178,059	22.1	17.0	18.9	42.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$110,520
Median Family Income MSA - 31900 Mansfield, OH MSA		\$54,044	Median Gross Rent			\$649
Median Family Income Non-MSAs - OH		\$56,217	Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

The OCC performed a full-scope evaluation for each of the bank's AAs. Based on the OCC's review of loan production reports and call report data, home mortgage lending is the bank's primary lending product.

LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Satisfactory.

Conclusions for Areas Receiving /Full-Scope Reviews

Based on a full-scope review, the bank's performance in the AA(s) is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

Refer to Table O in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The OCC compared the percentage of home loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AAs, as demonstrated by HMDA aggregate data.

The number and income distribution of geographies in the assessment areas are sufficient for a meaningful analysis of the geographic distribution of the institution's loan in its assessment areas. The bank originated 455 home mortgage loans over the evaluation period (2017-2019). The overall market originated 20,772 home mortgage loans in the Columbus, Ohio MSA, Mansfield, Ohio MSA, and Non-MSA AAs over the same period. The Columbus MSA, Mansfield MSA, and Non-MSA AAs consist of 6, 30, and 74 census tracts, respectfully. Of the total 110 census tracts, 1.8 percent are low income, 20 percent are moderate income, 60 percent are middle income, and 17.3 percent are upper income.

Columbus MSA AA

First Federal's geographic distribution in the Columbus, Ohio MSA AA does not require an analysis of its geographic distribution. The AA does not contain any low- or moderate-income census tracts.

Mansfield MSA AA

First Federal's Mansfield, Ohio MSA AA geographic distribution in relation to aggregate peer data and AA owner-occupied housing units is reasonable with no noticeable gaps. Home mortgage loans originated in all four income tracts are appropriately distributed and consistent with peer origination data (*see table O*). Examiners did note that the thrift did not originate any loans in low-income tracts in the AA in 2019. Management stated that two borrowers applied for loans in the low-income tracts, but had been denied because of high DTI ratios. Additionally, the Homeready Program is not available in Richland County.

Non-MSA AA

First Federal's Non-MSA AA geographic distribution in relation to aggregate peer data and AA owner-occupied housing units is excellent with no noticeable gaps. Home mortgage loans originated in all three income tracts (moderate, middle, and upper) are appropriately distributed and consistent with peer origination data (*see table O*).

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the distribution of families by income level (demographic data) in the AAs, placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data) in the AAs, as determined by HMDA aggregate data.

The thrift exhibits excellent distribution of home mortgage loans in the Columbus, Ohio MSA, Mansfield, Ohio MSA, and Non-MSA AAs. On average, in 2017 and 2018 the thrift originated a greater percentage of home mortgage loans than the aggregate percentage of mortgage loans originated by other lenders in the same AAs to low- and moderate-income borrowers (*see table P*). On average, in 2019 the thrift originated a greater percentage of home mortgage loans than the aggregate percentage of mortgage loans originated by other lenders in the same AAs to low-, moderate- and middle-income geographies (*see table P*).

Columbus MSA AA

First Federal's income-based distribution in the Columbus, Ohio MSA AA in relation to aggregate peer data and the distribution of families by income level is reasonable. The thrift shows reasonable penetration of borrowers in different income levels in the Columbus, Ohio MSA AA.

Mansfield MSA AA

First Federal's income-based distribution in the Mansfield, Ohio MSA AA in relation to aggregate peer data and the distribution of families by income level is reasonable. The thrift shows reasonable penetration of borrowers in different income levels in the Mansfield, Ohio MSA AA.

Non-MSA AA

First Federal's income-based distribution in the Non-MSA AA in relation to aggregate peer data and the distribution of families by income level is reasonable. The bank shows reasonable penetration of borrowers in different income levels in the Non-MSA AA.

Responses to Complaints

Examiners reviewed complaints since the previous exam. During the assessment period, First Federal received no written complaints relating to its performance in helping to meet the credit needs of its AAs.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	(01/01/2017 to 12/31/19)	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Ohio		
Columbus, OH AA	Full-scope	6 CTs consisting of the entirety of Morrow County
Mansfield, OH AA	Full-scope	30 CTs consisting of the entirety Richland County
Non-MSA AA	Full-scope	74 CTs consisting of the entirety of Crawford, Erie, Huron, Sandusky, and Seneca Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS	First Federal Bank of Ohio
Overall Bank:	Lending Test Rating
FIRST FEDERAL BANK OF OHIO	Satisfactory
MMSA or State:	
OHIO	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

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, which 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent 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 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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 qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): 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, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FFB of Ohio Columbus MSA AA 2017	49	5,015	10.7	1,089	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
FFB of Ohio Columbus MSA AA 2018	49	5,015	10.7	1,089	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
FFB of Ohio Mansfield MSA AA 2017	81	7,155	17.7	2,981	2.2	1.2	0.7	13.6	11.1	9.1	57.9	59.3	59.7	26.3	28.4	30.5	0.0	0.0	0.0
FFB of Ohio Mansfield MSA AA 2018	81	7,155	17.7	2,981	2.2	1.2	0.7	13.6	11.1	9.1	57.9	59.3	59.7	26.3	28.4	30.5	0.0	0.0	0.0
FFB of Ohio NonMSA AA 2017	99	9,065	21.6	6,001	0.0	0.0	0.0	14.0	17.2	14.0	63.7	58.6	61.1	22.3	24.2	24.9	0.0	0.0	0.0
FFB of Ohio NonMSA AA 2018	99	9,065	21.6	6,001	0.0	0.0	0.0	14.0	17.2	14.0	63.7	58.6	61.1	22.3	24.2	24.9	0.0	0.0	0.0
Total	229	21,235	50.0	10,071	0.6	0.4	0.2	12.8	11.4	11.0	65.1	67.7	64.9	21.5	20.5	23.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FFB of Ohio Columbus MSA AA 2019	55	7,295	24.3	1,222	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
FFB of Ohio Mansfield MSA AA 2019	72	6,580	31.9	3,136	2.2	0.0	0.9	13.6	11.1	9.1	57.9	52.8	57.2	26.3	36.1	32.8	0.0	0.0	0.0
FFB of Ohio NonMSA AA 2019	99	9,935	43.8	6,343	0.0	0.0	0.0	14.0	19.2	13.0	62.0	62.6	59.3	24.0	18.2	27.7	0.0	0.0	0.0
Total	226	23,810	100.0	10,701	0.6	0.0	0.3	12.8	11.9	10.4	64.0	68.6	63.3	22.6	19.5	26.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FFB of Ohio Columbus MSA AA 2017	49	5,015	10.7	1,089	22.2	12.2	12.8	22.4	20.4	24.6	23.5	36.7	23.9	31.9	30.6	23.6	0.0	0.0	15.2
FFB of Ohio Columbus MSA AA 2018	49	5,015	10.7	1,089	22.2	12.2	12.8	22.4	20.4	24.6	23.5	36.7	23.9	31.9	30.6	23.6	0.0	0.0	15.2
FFB of Ohio Mansfield MSA AA 2017	81	7,155	17.7	2,981	20.6	18.5	9.4	18.5	28.4	20.6	20.9	21.0	25.4	40.0	25.9	31.0	0.0	6.2	13.8
FFB of Ohio Mansfield MSA AA 2018	81	7,155	17.7	2,981	20.6	18.5	9.4	18.5	28.4	20.6	20.9	21.0	25.4	40.0	25.9	31.0	0.0	6.2	13.8
FFB of Ohio NonMSA AA 2017	99	9,065	21.6	6,001	19.0	16.2	8.7	18.2	39.4	23.7	22.0	17.2	23.1	40.8	26.3	31.0	0.0	1.0	13.4
FFB of Ohio NonMSA AA 2018	99	9,065	21.6	6,001	19.0	16.2	8.7	18.2	39.4	23.7	22.0	17.2	23.1	40.8	26.3	31.0	0.0	1.0	13.4
Total	229	21,235	50.0	10,071	19.6	16.2	9.4	18.6	31.4	22.9	21.8	22.7	23.9	39.9	27.1	30.2	0.0	2.6	13.7

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
FFB of Ohio Columbus MSA AA 2019	55	7,295	24.3	1,222	22.2	18.2	8.7	22.4	38.2	26.8	23.5	30.9	23.5	31.9	12.7	26.8	0.0	0.0	14.2	
FFB of Ohio Mansfield MSA AA 2019	72	6,580	31.9	3,136	20.6	8.3	5.6	18.5	23.6	17.6	20.9	29.2	24.6	40.0	37.5	38.5	0.0	1.4	13.8	
FFB of Ohio NonMSA AA 2019	99	9,935	43.8	6,343	19.0	11.1	7.0	18.2	21.2	21.9	22.0	28.3	23.8	40.8	39.4	33.7	0.0	0.0	13.7	
Total	226	23,810	100.0	10,701	19.6	11.9	6.8	18.6	26.1	21.2	21.8	29.2	24.0	39.9	32.3	34.3	0.0	0.4	13.8	

*Source: 2015 ACS Census ; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*