



PUBLIC DISCLOSURE

February 3, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Adams County of West Union
Charter Number: 13198

218 N. Market Street
West Union, OH 45693

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 **Outstanding**.

The lending test is rated: **Outstanding**.

The major factors that support this rating include:

The Lending Test rating is based on the state of Ohio rating and the following overall conclusions:

- The bank’s loan-to-deposit (LTD) ratio is reasonable, given the performance context factors discussed below.
- A substantial majority of the bank’s loans are inside its assessment area (AA).
- The bank exhibits an excellent geographic distribution of loans in the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels in the AA.

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 National Bank of Adams County of West Union’s (Adams County or bank) quarterly LTD ratio over the past 21 quarters since the previous Community Reinvestment Act (CRA) Performance Evaluation (January 1, 2021, to December 31, 2023) is 46 percent. The ratio ranged from a high of 50.7 percent as of September 30, 2024, to a low of 40.3 percent as of March 31, 2022. The quarterly average LTD ratio for similarly situated financial institutions located in or near the AA was 76.1 percent for the same period. The custom peer group consisted of three banks in Highland County, three in Clinton County, one in Ross County, one in Pike County, and one in Adams County. Asset sizes of peer banks ranged from \$3.8 billion to \$76 million, with the quarterly average LTD ratio ranging from 53.4 percent to 97.8 percent.

Lending in Assessment Area

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

The bank originated and purchased 88.3 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.

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	51	85.0	9	15.0	60	4,792	86.9	724	13.1	5,515
Consumer	55	91.7	5	8.3	60	737	93.9	48	6.1	785
Total	106	88.3	14	11.7	120	5,529	87.7	772	12.3	6,301

Description of Institution

The National Bank of Adams County is an independent community bank headquartered in West Union, Ohio. As of the 2020 U.S. Census, the branch is in a moderate-income census tract (CT). The AA also had two middle- income CTs that were determined to be distressed by the Federal Financial Institution Examinations Council (FFIEC) due to high levels of poverty and unemployment. Adams County did not open or close any branches during the evaluation period. There were no merger or acquisition activities during the review period.

Adams County is a single-state financial institution with one rating area (Ohio) and one AA. The AA is comprised of all seven CTs in Adams County, a non-metropolitan area. The entire AA (OH Non-MSA) is contiguous and does not appear to arbitrarily exclude any low- and moderate-income areas nor reflect illegal discrimination.

Adams County offers a traditional array of deposit and lending products. As of September 30, 2024, Adams County had total assets of \$110 million with tier 1 capital of \$12.1 million. Net loans and leases equaled \$49.5 million, or 45.0 percent of total assets. The bank's primary loan products are home mortgage loans and consumer. As of the September 30, 2024, Consolidated Report of Condition and Income (Call Report), residential mortgage loans represented the largest percentage of total loans at 48.5 percent followed by commercial and commercial real estate (business), consumer, and farm at 12.5, 6.5, and 1.5 percent, respectively.

The bank's market area (primarily Adams County) is economically depressed. The area has high unemployment and poverty relative to the State of Ohio, and there is little new economic development or activity in the region. As a result of the market area, the bank has a relatively large exposure to subprime borrowers. One recent development in the bank's local market is the closure of two power plants in Adams County. The plants were a major employer in the area, had a significant influence on the county tax base, and had ancillary benefits to other businesses in the area. Further analysis performed by bank management showed that this did not have a significant direct impact on the bank and its customers.

Adams County's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs in the AA. The previous CRA Performance Evaluation was completed as of September 23, 2019, and resulted in a rating of "Outstanding."

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank’s record of meeting the credit needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC) used small bank CRA evaluation procedures to assess the bank’s performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2021, to December 31, 2023.

The OCC evaluated the bank’s lending performance based on its primary lending products, home mortgage and consumer lending. Based on the number of loans originated and purchased during the evaluation period, consumer loans accounted for 49.0 percent, residential real estate loans (including home equity lines of credit) accounted for 24.3 percent, commercial and commercial real estate loans (business loans) accounted for 13.7 percent, and farm loans accounted for 13.1 percent. Based on the dollar amount of loans originated and purchased during the evaluation period, residential real estate accounted for 44.5 percent, farm accounted for 26.2 percent, business accounted for 14.7 percent, and consumer loans accounted for 14.5 percent. Business and farm loans were not considered in this evaluation as these loan types did not constitute a substantial majority of the bank’s lending. Bank management did not request consideration of these loans. The OCC transaction tested home mortgage and consumer loans for each year of the evaluation period. Examiners tested 20 loans per year. A minimum of at least 20 loans were needed in a loan product and in each analysis period for a meaningful analysis.

This evaluation period included two census periods. For analysis purposes, the OCC compared the bank’s lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2021 home mortgages and consumer lending and the 2020 U.S. Census for 2022 and 2023 home mortgages and consumer lending. Two sets of tables are included in Appendix D for each census period. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of the Examination, 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 of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Adams County has one AA in Ohio, as described in the “Description of Institution” and “Description of Institution’s Operations in Ohio” sections of this evaluation. The OCC completed a full-scope review of the OH Non-MSA.

Ratings

The bank's overall rating is based on the state of Ohio rating. During the evaluation period, Adams County operated its only office in a single state. Therefore, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in the OH Non-MSA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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 Ohio: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank's LTD ratio is reasonable.
- A substantial majority of the bank's loans are inside its AA.
- The overall geographic distribution of home mortgage loans is reasonable, given the performance context factors discussed below.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels within the AA.
- The bank has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

Description of Institution's Operations in Ohio

Adams County has designated one AA in Ohio, the OH Non-MSA. The bank selected the AA based on its targeted lending area and office location. The AA is contiguous and does not appear to reflect illegal discrimination, nor does it arbitrarily exclude low- and moderate-income areas.

During the evaluation period, the OH Non-MSA included Adams County in its entirety. The bank has one full-service office in West Union, Ohio. As of the 2020 U.S. Census, the branch is in a moderate-income census tract (CT). The office has a drive-up facility. The AA has two middle-income CTs that were determined to be distressed by the Federal Financial Institution Examinations Council (FFIEC) due to high levels of poverty and unemployment.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contact/credit needs provides additional performance context for Adams County's operations in Ohio. The tables below provide a summary of demographic data for the AA.

OH Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: OH Non-MSA Adams County - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	66.7	33.3	0.0	0.0
Population by Geography	28,229	0.0	57.5	42.5	0.0	0.0
Housing Units by Geography	12,848	0.0	60.8	39.2	0.0	0.0
Owner-Occupied Units by Geography	7,495	0.0	58.4	41.6	0.0	0.0
Occupied Rental Units by Geography	3,363	0.0	67.9	32.1	0.0	0.0
Vacant Units by Geography	1,990	0.0	57.8	42.2	0.0	0.0
Businesses by Geography	1,320	0.0	62.0	38.0	0.0	0.0
Farms by Geography	132	0.0	38.6	61.4	0.0	0.0
Family Distribution by Income Level	7,441	31.5	21.2	18.1	29.2	0.0
Household Distribution by Income Level	10,858	34.9	15.8	17.4	32.0	0.0
Median Family Income Non- MSA - OH		\$55,785	Median Housing Value			\$90,719
			Median Gross Rent			\$566
			Families Below Poverty Level			18.8%

Source: 2015 ACS: 01/01/2021-12/31/2021.
 Due to rounding, totals may not equal 100.0.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: OH Non-MSA – 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	57.1	28.6	14.3	0.0
Population by Geography	27,477	0.0	57.1	28.4	14.5	0.0
Housing Units by Geography	12,940	0.0	62.6	25.5	11.9	0.0
Owner-Occupied Units by Geography	7,310	0.0	57.1	28.0	14.8	0.0
Occupied Rental Units by Geography	3,086	0.0	71.2	24.1	4.7	0.0
Vacant Units by Geography	2,544	0.0	67.8	20.1	12.1	0.0
Businesses by Geography	2,037	0.0	58.6	25.0	16.4	0.0
Farms by Geography	175	0.0	42.9	34.3	22.9	0.0
Family Distribution by Income Level	7,286	32.5	17.2	18.2	32.0	0.0
Household Distribution by Income Level	10,396	36.4	15.7	15.4	32.4	0.0
Median Family Income Non- MSA - OH		\$66,684	Median Housing Value			\$113,498
			Median Gross Rent			\$573
			Families Below Poverty Level			15.2%

Source: 2020 U.S. Census: 01/01/2022-12/31/2023 Bank Data
 Due to rounding, totals may not equal 100.0.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Demographic Data

Based on the 2015 ACS U.S. Census data, Adams County was comprised of four moderate income and three middle-income CTs in 2021. There were two distressed middle-income nonmetropolitan tracts (7702.00 and 7703.00) due to high levels of poverty and unemployment during the evaluation period. The AA included 7,441 families and 10,858 households.

As of the 2020 U.S. Census data for 2022 and 2023, the AA consisted of four moderate-income, two middle-income, and one upper-income CTs. There were two distressed middle-income nonmetropolitan tracts (7702.00 and 7703.02) due to high levels of poverty and unemployment during the evaluation period. The AA included 7,286 families and 10,396 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value in the OH Non-MSA was \$90,719. Based on the 2021 updated Federal Financial Institution Examinations Council's (FFIEC) median family income of \$55,785, low-income families earned less than \$32,350. Therefore, median housing values were at least 1.7 times the annual income of low-income families in the AA. The high housing costs relative to income can be a substantial obstacle to homeownership among low-income families. There were 12,848 total housing units in the AA, of which 58.3 percent were owner-occupied, 26.2 percent were rental occupied units, and 15.5 percent were vacant. The poverty rate was moderate, as approximately 18.8 percent of families and 24 percent of households lived below the poverty level.

According to the 2020 U.S. Census data, the median housing value in the OH Non-MSA was \$113,498. Based on the 2023 updated FFIEC's median family income of \$66,684, low-income families earned less than \$39,750. Therefore, median housing values were at least 1.7 times the annual income of low-income families in the AA. The high housing costs relative to income can be a substantial obstacle to homeownership among low-income families. There were 12,940 total housing units in the AA, of which 56.5 percent were owner-occupied, 23.8 percent were rental occupied units, and 19.7 percent were vacant. The poverty rate was moderate, as approximately 15.2 percent of families and 19.6 percent of households lived below the poverty level.

Job Market and Economic Conditions

Through discussions with management, overall economic conditions in Adams County are similar to those across the tri-state area. The housing market has slowed down since 2022 and early 2023. During the evaluation period, the local economy was overall stable with higher unemployment rates than the state and national levels. Based on the U.S. Bureau of Labor Statistics Data, the unemployment rate (not seasonally adjusted) in Adams County was 4.8 percent as of December 2023. The Ohio statewide unemployment rate was 3.5 percent, and the national unemployment rate was 3.6 percent. Southwestern Ohio has a diverse mix of companies across many industries. Major employers in the AA include the Adams County Schools, General Electric, Adams County Regional Medical Facility, and the Adams County Local Government.

Competition

Adams County operates in a competitive financial services market, with national and regional banks, savings associations, and community banks present. According to the Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report as of June 30, 2023, there were five deposit-taking financial institutions in Adams County, with 11 total banking offices. Adams County held approximately \$100.1 million in total deposits, which represents a 16.2 percent of the total deposit market share. Adams County ranked fourth in deposit market share. Financial institutions with

significant deposit market share in the AA included First State Bank, Fifth Third Bank, and Southern Hills Community Bank, with a combined deposit market share of 83.3 percent.

Competition for home mortgage and consumer loans in the AA are moderate. As stated above, Adams County's primary loan products are home mortgage and consumer lending. During the evaluation period, the bank was not a Home Mortgage Disclosure Act (HMDA) reporter and was therefore not listed on the 2022 Peer Mortgage Data Report.

Community Contacts/Credit Needs

As part of this CRA evaluation, the OCC reviewed information provided from an interview with a representative of an organization that provides support for low-income families. The contact identified starter homes and senior housing as primary needs in the community. In the contact's opinion, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the OH Non-MSA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Consumer and home mortgage lending are the bank's primary lending products and were evaluated under the Lending Test. Consumer loans were given more weight. By the number of loans originated, the bank makes more consumer loans than home mortgage loans, but the average consumer loan is much smaller in dollar amount than the average home mortgage loan. The OCC transaction tested 20 consumer and 20 home mortgage loans each year of the evaluation period. Refer to the "Scope of the Evaluation" section for more details.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the OH Non-MSA is excellent.

Distribution of Loans by Income Level of the Geography

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

In the geographic distribution analysis, examiners considered several performance context factors. According to the FFIEC, two middle-income CTs in the AA were considered distressed due to high unemployment and/or poverty. As of the 2015 ACS U.S. Census, the average age of housing stock in the moderate-income CTs was 42 years. As of the 2020 U.S. Census, the average age of housing stock in the moderate-income CTs was 45 years. The maintenance costs associated with older housing stock is a significant obstacle to homeownership, which may result in a reduction of mortgage demand. As of the 2020 U.S. Census, the bank has a full-service branch in a moderate-income CT.

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.

2021

The geographic distribution of home mortgage loans in 2021 is reasonable.

There were no low-income geographies in the AA during the evaluation period. The percentage of home mortgage loans in moderate-income geographies was slightly below the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022 – 2023

The geographic distribution of home mortgage loans in 2022 and 2023 was reasonable.

There were no low-income geographies in the AA during the evaluation period. The percentage of home mortgage loans in moderate-income geographies was slightly below the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Consumer Loans

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

2021

The geographic distribution of consumer loans in 2021 is reasonable.

There were no low-income geographies in the AA during the evaluation period. The percentage of consumer loans in moderate-income geographies was slightly above the percentage of households located in those geographies. Aggregate data was not available for consumer loans.

2022 – 2023

The geographic distribution of consumer loans in 2022 and 2023 is reasonable.

There were no low-income geographies in the AA during the evaluation period. The percentage of consumer loans in moderate-income geographies was slightly below the percentage of households located in those geographies.

Lending Gap Analysis

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and maps. The OCC noted that loans were made in all seven geographies during the evaluation period.

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.

In evaluating the borrower income distribution of home mortgage and consumer loans, the OCC considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different income levels, as well as the economic conditions and demographic data in the AA. Adams County has been faced with economic challenges during the evaluation period. The county has struggled with higher unemployment rates when compared to state and national averages. According to management, median household income in Adams County tends to be lower than state and national levels and can present an economic disparity for those accessing financial services, housing, and other essential needs. Additionally, examiners considered the substantial poverty rate in the AA (refer to the Description of Institution's Operations in Ohio).

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.

2021

The distribution of home mortgage loans among individuals of different income levels in 2021 was excellent.

The percentage of home mortgage loans to low-income borrowers was slightly below the percentage of those families and greatly exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families and the aggregate percentage of all reporting lenders.

2022 – 2023

The distribution of home mortgage loans among individuals of different income levels in 2022 and 2023 was reasonable.

The percentage of home mortgage loans to low-income borrowers was below the percentage of those families and was slightly above the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income was slightly above the percentage of those families and was near the aggregate percentage of all reporting lenders.

Consumer Loans

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

2021

The distribution of consumer loans among individuals of different income levels in 2021 was excellent.

The percentage of consumer loans to low-income borrowers was near the percentage of households. The percentage of consumer loans to moderate-income borrowers was significantly above the percentage of households. Aggregate data was not available for consumer loans.

2022 – 2023

The distribution of consumer loans among individuals of different income levels in 2022 and 2023 was reasonable.

The percentage of consumer loans to low-income borrowers was slightly above the percentage of households. The percentage of consumer loans to moderate-income borrowers was slightly below the percentage of households. Aggregate data was not available for consumer loans.

Responses to Complaints

Adams County has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

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:	1/1/2021 to 12/31/2023	
Bank Products Reviewed:	Home Mortgage and Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Ohio		
OH Non-MSA	Full-scope	AA included all CTs in Adams County

Appendix B: Summary of MMSA and State Ratings

RATINGS The National Bank of Adams County	
Overall Bank:	Lending Test Rating
The National Bank of Adams County	Outstanding
State:	
Ohio	Outstanding

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																				2021		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts						
	#	\$ (\$000)	% of Total	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate				
OH Non-MSA	20	1,337	100.0	0.0	0.0	0.0	58.4	50.0	55.0	41.6	50.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0				
Total	20	1,337	100.0	0.0	0.0	0.0	58.4	50.0	55.0	41.6	50.0	45.0	0.0	0.0	0.0	0.0	0.0	0.0				

Source: 2015 ACS: 01/01/2021- 12/31/2021.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-2023		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts						
	#	\$ (\$000)	% of Total	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate	% of Households	% Bank Loans	Aggregate				
OH Non-MSA	40	3,976	100.0	0.0	0.0	0.0	57.1	45.0	54.2	28.0	25.0	30.8	14.8	30.0	14.9	0.0	0.0	0.0				
Total	40	3,976	100.0	0.0	0.0	0.0	57.1	45.0	54.2	28.0	25.0	30.8	14.8	30.0	14.9	0.0	0.0	0.0				

Source: 2020 U.S Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021	
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (\$000)	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
OH Non-MSA	20	1,337	100.0	31.5	25.0	9.6	21.2	35.0	20.9	18.1	20.0	20.9	29.2	20.0	28.5	0.0	0.0	18.3
Total	20	1,337	100.0	31.5	25.0	9.6	21.2	35.0	20.9	18.1	20.0	20.9	29.2	20.0	28.5	0.0	0.0	18.3

Source: 2015 ACS: 01/01/2021- 12/31/2021.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2022-2023	
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (\$000)	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
OH Non-MSA	40	3,976	100.0	32.5	17.5	13.7	17.2	22.5	24.5	18.2	25.0	25.9	32.0	35.0	21.6	0.0	0.0	14.3
Total	40	3,976	100.0	32.5	17.5	13.7	17.2	22.5	24.5	18.2	25.0	25.9	32.0	35.0	21.6	0.0	0.0	14.3

Source: 2020 U.S Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (\$000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
OH Non-MSA	20	208	100.0	0.0	0.0	61.3	65.0	38.7	35.0	0.0	0.0	0.0	0.0	
Total	20	208	100.0	0.0	0.0	61.3	65.0	38.7	35.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS: 01/01/2021- 12/31/2021.
Due to rounding, totals may not equal 100.0*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-2023	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (\$000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
OH Non-MSA	40	616	100.0	0.0	0.0	61.3	57.5	26.9	15.0	11.8	27.5	0.0	0.0	
Total	40	616	100.0	0.0	0.0	61.3	57.5	26.9	15.0	11.8	27.5	0.0	0.0	

*Source: 2020 U.S Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0*

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate- Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (S000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
OH Non-MSA	20	208	100.0	34.9	35.0	15.8	40.0	17.4	10.0	32.0	15.0	0.0	0.0	
Total	20	208	100.0	34.9	35.0	15.8	40.0	17.4	10.0	32.0	15.0	0.0	0.0	

*Source: 2015 ACS: 01/01/2021- 12/31/2021.
Due to rounding, totals may not equal 100.0*

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-2023	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (S000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
OH Non-MSA	40	616	100.0	36.4	42.5	15.7	10.0	15.4	17.5	32.4	30.0	0.0	0.0	
Total	40	616	100.0	36.4	42.5	15.7	10.0	15.4	17.5	32.4	30.0	0.0	0.0	

*Source: 2020 U.S Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0*