



## **PUBLIC DISCLOSURE**

February 3, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Greenville Federal  
Charter Number: 700641

690 Wagner Ave.  
Greenville, OH 45331

Office of the Comptroller of the Currency

Central Ohio – Indiana Office  
655 Metro Place South, Suite 625  
Dublin, OH 43017

**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 rating is based on the state of Ohio rating and the following overall conclusions.
  - The bank exhibits a reasonable geographic distribution of loans.
  - The bank exhibits a reasonable distribution of loans to individuals of different income levels.
  - The bank's loan-to-deposit (LTD) ratio is more than reasonable.
  - A substantial majority of the bank's loans are inside its assessment areas (AA).
  - The bank originated a significant volume of community development (CD) loans that were responsive to the credit needs of businesses during the COVID-19 pandemic and had a positive effect on the bank's overall Lending Test performance.

### Loan-to-Deposit Ratio

Considering Greenville Federal's (or "the bank") size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

Greenville Federal's quarterly average LTD ratio over the 18 quarters (September 30, 2019, to December 31, 2023) since the previous Community Reinvestment Act (CRA) Performance Evaluation was 86.9 percent. The ratio ranged from a high of 100.1 percent as of September 30, 2019, to a low of 81.1 percent as of March 31, 2022. The bank's quarterly average LTD ratio compared favorably to the quarterly average LTD ratio of 75.7 percent for similarly situated financial institutions headquartered in Darke and Miami Counties in Ohio. The custom peer group consisted of four banks in Darke County and two banks in Miami County. Asset sizes of peer banks ranged from \$56 million to \$570 million, with the quarterly average LTD ratios ranging from 62.5 percent to 85.7 percent. During the evaluation period, Greenville Federal sold \$29 million home mortgage loans to the secondary market.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 78 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. Examiners considered the lack of population growth in Darke County and the corresponding impact on Darke County loan demand in the conclusion that the bank's performance exceeds the standards for satisfactory performance under this criterion. In Darke County, the population decreased almost one percent from the 2015 American Community Survey (ACS) Census data to the 2020 U.S. Census data.

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	391	78.0	110	22.0	501	86,948	77.1	25,886	22.9	112,834

*Source: 1/1/21 to 12/31/23 Bank Data (Home Mortgage Disclosure Act (HMDA) data).  
Due to rounding, totals may not equal 100.0 percent.*

## Description of Institution

Greenville Federal is a federally chartered stock savings and loan association headquartered in Greenville, Ohio. The bank is a subsidiary of the holding company, Greenville Federal MHC, also located in Greenville. The holding company is a federally chartered mutual holding company. There are no affiliates. As of December 31, 2023, the bank had total assets of \$239 million and tier 1 capital of \$20.6 million, with net loans and leases representing 77.7 percent of total assets. As of December 31, 2023, the bank reported total loans of \$187 million, representing 78.2 percent of total assets. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

The main office is in Greenville, Ohio, in an upper-income census tract (CT) as of the 2020 U.S. Census. In addition to the main office in Darke County, the bank has three branches in Miami County, one in Tipp City and two in Troy. Each office has a drive-up facility and deposit-taking automated teller machine (ATM). All branches are in middle- and upper-income CTs. Additionally, the bank has five stand-alone ATMs in Darke County, with two that accept deposits. During the evaluation period, the bank also had an additional office (Greenville Kroger Banking Center) in Greenville, Ohio, that closed in July 2024. This closure will be evaluated under a future performance evaluation. Greenville Federal closed the Troy Kroger Banking Center in May 2023, and opened the Troy South Banking Center on South Dorset Road in Troy, Ohio, in May 2023. Both offices were in the same middle-income geography, approximately two miles apart.

Greenville Federal is a single-state financial institution with one rating area, the state of Ohio. There are two AAs, which include Darke County in a non-metropolitan area (OH Non-MSA) and Miami County in the Dayton, Ohio Metropolitan Statistical Area (Dayton MSA). Darke County is located on the west-central edge of Ohio, bordering Indiana. Miami County borders the eastern edge of Darke County and was added to the AA in 2016 with the addition of the Troy Branch. The AA is further described in the "Description of Institution's Operations in Ohio" section of this evaluation.

Greenville Federal serves the two AAs with traditional deposit and lending products through their full-service banking centers to accommodate their customers, including home mortgage, business, and consumer loans. There are no substantial differences in the business focus or services offered between the branches. Additionally, the bank offers online banking and bill pay, mobile banking, mobile wallet, and debit cards. The bank primarily originates residential real estate loans (home mortgage), with a portion sold to the secondary market. The home mortgage lending orientation of the bank is reflected on the December 31, 2023, Consolidated Report of Condition and Income (Call Report), as loans secured by residential real estate (including multifamily and home equity lines of credit) totaled \$134.6 million, or 72 percent of total loans and leases. The remainder of the loan portfolio consisted of 26 percent commercial and industrial and commercial real estate loans, with two percent as farm and consumer loans.

Beginning in early 2020, the global economy was adversely affected by the COVID-19 pandemic, which spread worldwide and caused deteriorating economic conditions resulting from stay-at-home orders and businesses shutting down to lessen the spread and impact of the virus. Greenville Federal responded to customers facing financial hardship during the pandemic by participating in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), which provided small and mid-sized businesses impacted by the pandemic with funds to cover payroll costs and other expenses. In 2021, Greenville Federal originated 198 PPP loans providing \$7.6 million in critical funding to businesses.

There are no financial, legal, or other factors impeding Greenville Federal's ability to help meet the credit needs of its AAs. The previous CRA rating was Outstanding as of the Performance Evaluation (PE) dated September 9, 2019.

## **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 product, home mortgage lending. Based on the number of loans originated and purchased during the evaluation period, residential real estate loans (including home equity and home equity lines of credit) accounted for 67.4 percent, commercial and industrial and commercial real estate loans (business loans) accounted for 16.4 percent, consumer loans accounted for 10.9 percent, and farm loans accounted for 5.3 percent. Based on the dollar amount of loans originated and purchased during the evaluation period, residential real estate accounted for 71.7 percent, business loans accounted for 26.6 percent, consumer loans accounted for 1.1 percent, and farm loans accounted for 0.6 percent. Business, consumer, 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 used Home Mortgage Disclosure Act (HMDA) data for each year of the evaluation period for the home mortgage lending analysis.

This evaluation period included two census periods. In evaluating the geographic distribution and borrower income distribution under the Lending Test for the HMDA data, examiners compared the bank's lending performance with demographic data from the 2015 ACS Census for 2021 home mortgages and the 2020 U.S. Census for 2022 and 2023 home mortgages. Two sets of tables are included in Appendix D to account 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 AAs 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 the 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.

Greenville Federal has two AAs in Ohio, as described in the “Description of Institution’s Operations in Ohio” section of this evaluation. The OCC completed a full-scope review of each AA, the OH Non-MSA and Dayton MSA.

## **Ratings**

The bank’s overall rating is based on the state of Ohio rating. During the evaluation period, Greenville Federal operated all branch offices 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 both AAs.

The OH Non-MSA represented the bank’s largest market with the most deposits and lending activity. By number of home mortgage loans originated inside the AAs, 56.5 percent were in the OH Non-MSA and 43.5 percent were in the Dayton MSA. The OH Non-MSA held 85.2 percent of total deposits as of June 30, 2023, and 40 percent of total branches as of December 31, 2023. The bank’s main office is headquartered in the OH Non-MSA, with Greenville Federal ranked fourth in deposit market share out of 11 financial institutions in Darke County with 12.1 percent of the deposit market share, according to the Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Report as of June 30, 2023. Examiners placed more weight on the OH Non-MSA.

## **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<sup>1</sup>:** Satisfactory.

**The Lending Test is rated:** Satisfactory.

The major factors that support this rating include:

- The overall geographic distribution of home mortgage loans is reasonable.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels.
- The bank has not received any complaints about its performance in helping to meet the AAs' credit needs during the evaluation period.
- The bank originated a significant volume of CD loans that were responsive to the credit needs of businesses during the COVID-19 pandemic and had a positive effect on the bank's overall Lending Test performance.

### Description of Institution's Operations in Ohio

Greenville Federal designated two AAs in the state of Ohio. The first AA included Darke County, Ohio, in its entirety, in a non-MSA (OH Non-MSA). The second AA included Miami County, Ohio, in its entirety, in the Dayton, Ohio MSA 19430 (Dayton MSA). Bank management selected the AAs based on its targeted lending area, deposits, and branch locations. Greenville is the largest city and county seat of Darke County. Troy is the largest city and county seat of Miami County. Greenville Federal offers traditional banking products with a focus on mortgage lending, but also offers consumer and business products, mobile banking, and online banking. Refer to Appendix A for a complete list of counties included.

#### OH Non-MSA

As of December 31, 2023, Greenville Federal had two branches and seven ATMs in the OH Non-MSA. Each branch had a deposit taking ATM, with five stand-alone ATMs (two were deposit taking) in the AA. All branches were in middle- or upper-income geographies as of the 2020 U.S. Census. All ATMs were in middle- or upper-income geographies; however, two ATMs were in moderate-income geographies in 2021 as of the 2015 ACS Census. The main office is in Greenville, Ohio, in an upper-income geography as of the 2020 U.S. Census.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional

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

performance context for Greenville Federal’s operations in the OH Non-MSA. The tables below provide a summary of demographic data for the AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: OH Non-MSA (2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	12	0.0	16.7	66.7	16.7	0.0
Population by Geography	52,356	0.0	15.2	70.7	14.1	0.0
Housing Units by Geography	22,723	0.0	16.5	70.9	12.6	0.0
Owner-Occupied Units by Geography	15,053	0.0	11.4	74.4	14.2	0.0
Occupied Rental Units by Geography	5,812	0.0	28.6	63.0	8.4	0.0
Vacant Units by Geography	1,858	0.0	19.7	67.7	12.6	0.0
Businesses by Geography	2,890	0.0	21.3	62.5	16.2	0.0
Farms by Geography	438	0.0	2.5	82.4	15.1	0.0
Family Distribution by Income Level	14,154	21.2	17.5	24.1	37.3	0.0
Household Distribution by Income Level	20,865	22.4	18.3	19.5	39.8	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$110,158
			Median Gross Rent			\$610
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2021 Dun and Bradstreet (D&amp;B) Data.                      Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: OH Non-MSA (2022 – 2023)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	14	7.1	0.0	71.4	21.4	0.0
Population by Geography	51,881	7.2	0.0	71.2	21.6	0.0
Housing Units by Geography	22,975	7.9	0.0	72.4	19.7	0.0
Owner-Occupied Units by Geography	14,983	4.3	0.0	73.0	22.7	0.0
Occupied Rental Units by Geography	6,188	15.4	0.0	72.3	12.3	0.0
Vacant Units by Geography	1,804	12.4	0.0	67.6	20.1	0.0
Businesses by Geography	4,711	9.6	0.0	69.5	21.0	0.0
Farms by Geography	628	1.8	0.0	69.3	29.0	0.0
Family Distribution by Income Level	14,219	18.2	18.8	20.8	42.2	0.0
Household Distribution by Income Level	21,171	21.0	17.7	18.3	43.0	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$119,245
			Median Gross Rent			\$666
			Families Below Poverty Level			7.6%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data.            Due to rounding, totals may not equal 100.0%            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the OH Non-MSA was 51,881, with 7.2 percent living in low-income CTs, 71.2 percent in middle-income CTs, and 21.6 percent in upper-income CTs. The AA consisted of 14 CTs, and was comprised of one low-income, 10 middle-income, and three upper-income CTs. The AA included 14,219 families and 21,171 households. The major changes from the 2015 ACS to the 2020 U.S. Census included a one percent decrease in total population, one CT changing from moderate-income to low-income, and one CT moving from moderate-income to middle-income.

### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the Federal Financial Institutions Examination Council's (FFIEC) updated MSA median family income, low-income families earned less than \$32,350 in 2021, \$37,450 in 2022, and \$39,750 in 2023 and moderate-income families earned less than \$51,760 in 2021, \$59,920 in 2022, and \$63,600 in 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income based on a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$809 per month in 2021, \$936 per month in 2022, and \$994 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,294 per month in 2021, \$1,498 per month in 2022, and \$1,590

per month in 2023. According to Realtor.com in 2023, the median home value would result in a monthly payment of approximately \$1,208. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the OH Non-MSA, the poverty level according to the 2015 ACS was 9.9 percent and declined to 7.6 percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 26.9 percent (15.4 percent in low-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 7.9 percent (12.4 percent in low-income CTs) of total housing units. Owner-occupied units in the AA accounted for 65.2 percent of total housing units, with only 4.3 percent in low-income CTs. There were no moderate-income CTs in the OH Non-MSA as of the 2020 U.S. Census.

Job Market and Economic Conditions

Economic conditions in Darke County were stable. According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for Darke County gradually improved during the evaluation period. Comparatively, the average annual unemployment rate for Darke County was lower than the state of Ohio and national unemployment rates. The following table summarizes the unemployment rates.

Average Annual Unemployment Rates			
	2021	2022	2023
State of Ohio	5.1	4.0	3.5
United States	5.4	3.7	3.6
Darke County	4.0	3.5	3.1

*Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.*

According to business demographic data from Dun and Bradstreet (D&B) as of June 2023, the AA had a diverse mix of companies across many industries with a significant presence of services, retail trade, and agriculture, forestry, and fishing. Large employers in Darke County included Midmark Corporation, Whirlpool Corporation, FRAM, and MTNA Greenville (formerly Greenville Technology).

Competition

Competition for deposits in Darke County was strong with 11 total FDIC insured financial institutions operating 24 offices in Darke County. According to the FDIC’s Deposit Market Share Report as of June 30, 2023, Greenville Federal had \$187.8 million in deposits in Darke County which comprised 85.2 percent of total bank deposits. The bank had a deposit market share of 12.1 percent and was ranked fourth out of 11 financial institutions. The top competitors in Darke County were Greenville National Bank with seven branches and 27.5 percent market share, Park National Bank with five branches and 22.3 percent market share, and Osgood Bank with one branch and 12.3 percent market share.

Greenville Federal’s primary business focus was home mortgage lending. There was strong competition for home mortgage loans during the evaluation period. Based on 2021 Peer Mortgage Data and 2015 ACS Census data, the bank ranked fourth out of 132 lenders in the OH Non-MSA in residential home

mortgage volume. As of the 2021 Peer Mortgage Data Report, Greenville Federal had seven percent of the lending market share, based on the number of loans, lending approximately \$20.2 million. Based on 2021 Peer Mortgage Data, top mortgage lenders in the OH Non-MSA included Caliber Home Loans, Inc. with 15.3 percent market share, Park National Bank with 11.5 percent market share, and Greenville National Bank with 10.2 percent market share. During the evaluation period, 56.4 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the OH Non-MSA.

While home mortgage lending was the bank's primary business focus, the volume of home mortgage lending decreased in 2022 and 2023 after an increase during the COVID-19 pandemic. The higher volume of originations in 2020 and 2021 was attributed to comparatively lower interest rates. In general, mortgage rates began to rise significantly in late 2021 and early 2022 after reaching historic lows during the COVID-19 pandemic. Based on 2023 Peer Mortgage Data and 2020 U.S. Census data, the bank ranked seventh out of 124 lenders in the OH Non-MSA in residential home mortgage volume. As of the 2023 Peer Mortgage Data Report, Greenville Federal had 3.7 percent of the lending market share, based on the number of loans, lending approximately \$3.5 million. Based on 2023 Peer Mortgage Data, top mortgage lenders in the OH Non-MSA included Newrez LLC with 11.4 percent market share, Greenville National Bank with 10.9 percent market share, and Park National Bank with 10.2 percent market share. During the evaluation period, 56.7 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the OH Non-MSA in 2022 and 2023.

#### Community Contacts/Credit Needs

Examiners reviewed information provided from a recent interview with a community contact to understand the OH Non-MSA's needs and opportunities. According to the contact, overall economic conditions in Darke County are stable and the county unemployment rates are typically lower than the state and national rates. The contact stated "workforce" affordable housing at market rates is a need in the community. This contact also stated there is a need for more housing at market rates that would be affordable to most in the area. According to the community contact, small business lending is a credit need in the community and the agriculture industry is strong in Darke County. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

#### Dayton MSA

As of December 31, 2023, Greenville Federal had three branches in Miami County, with a deposit-taking ATM at each branch. All branches were in middle- or upper-income geographies. In May of 2023, the bank closed the Troy Kroger Banking Center and opened the new Troy South Banking Center about two miles from the previous location.

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dayton MSA (2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	21	0.0	14.3	61.9	23.8	0.0
Population by Geography	103,517	0.0	15.1	55.7	29.1	0.0
Housing Units by Geography	44,266	0.0	15.5	57.4	27.1	0.0
Owner-Occupied Units by Geography	28,906	0.0	13.8	55.1	31.1	0.0
Occupied Rental Units by Geography	12,229	0.0	19.3	61.5	19.2	0.0
Vacant Units by Geography	3,131	0.0	16.8	62.6	20.6	0.0
Businesses by Geography	6,200	0.0	11.8	59.0	29.2	0.0
Farms by Geography	399	0.0	7.3	69.9	22.8	0.0
Family Distribution by Income Level	27,826	18.4	18.1	22.1	41.4	0.0
Household Distribution by Income Level	41,135	20.2	16.4	18.3	45.1	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$61,957	Median Housing Value			\$136,433
			Median Gross Rent			\$734
			Families Below Poverty Level			9.8%
<i>Source: 2015 ACS and 2021 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dayton MSA (2022 – 2023)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	23	0.0	13.0	56.5	30.4	0.0
Population by Geography	108,774	0.0	12.3	52.0	35.7	0.0
Housing Units by Geography	44,394	0.0	14.2	54.0	31.8	0.0
Owner-Occupied Units by Geography	29,748	0.0	12.8	51.3	35.9	0.0
Occupied Rental Units by Geography	11,512	0.0	17.3	59.8	22.9	0.0
Vacant Units by Geography	3,134	0.0	15.7	57.8	26.5	0.0
Businesses by Geography	10,873	0.0	10.5	50.5	39.1	0.0
Farms by Geography	592	0.0	5.9	54.9	39.2	0.0
Family Distribution by Income Level	26,976	15.3	18.0	24.1	42.6	0.0
Household Distribution by Income Level	41,260	19.7	15.5	19.4	45.3	0.0
Median Family Income MSA - 19430 Dayton-Kettering, OH MSA		\$75,125	Median Housing Value			\$153,493
			Median Gross Rent			\$800
			Families Below Poverty Level			5.0%
<i>Source: 2020 U.S. Census and 2023 D&amp;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>						

### Demographic Data

As of the 2020 U.S. Census data in the table above, the population of the Dayton MSA was 108,774, with 12.3 percent living in moderate-income CTs, 52 percent in middle-income CTs, and 35.7 percent in upper-income CTs. The AA consisted of 23 CTs, and was comprised of three moderate-income, 13 middle-income, and seven upper-income CTs. The AA included 26,976 families and 41,260 households. The major changes from the 2015 ACS to the 2020 U.S. Census included a five percent growth in population, two CTs changed from moderate-income to middle-income, and two CTs changed from middle-income to moderate-income.

### Affordable Housing Cost

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the weighted average of the FFIEC's updated MSA median family income, low-income families earned less than \$37,850 in 2021, \$42,050 in 2022, and \$46,200 in 2023 and moderate-income families earned less than \$60,560 in 2021, \$67,280 in 2022, and \$73,920 in 2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income based on a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$946 per month in 2021, \$1,051 per month in 2022, and \$1,155 per month in 2023. A moderate-income borrower could afford a maximum payment of \$1,514 per month in 2021, \$1,682 per month in 2022, and \$1,848 per month in 2023. According to Realtor.com in 2023, the median home value would result in a monthly payment of approximately \$1,179. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Dayton MSA, the poverty level according to the 2015 ACS was 9.8 percent and declined to five percent based on the 2020 U.S. Census data.

Housing availability in the AA posed challenges to lending in low- and moderate-income geographies. As of the 2020 U.S. Census, total occupied rental units in the AA were 25.9 percent (17.3 percent in moderate-income CTs) of available units. An additional barrier to available units was the volume of vacant units of 7.1 percent (15.7 percent in moderate-income CTs) of total housing units. Owner-occupied units in the AA accounted for 67 percent of total housing units, with 12.8 percent in moderate-income geographies. There were no low-income geographies in the Dayton MSA as of the 2020 U.S. Census.

### Job Market and Economic Conditions

Economic conditions in Miami County were stable. According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate for Miami County gradually improved during the evaluation period. Comparatively, the average annual unemployment rate for Miami County was lower than the state of Ohio and national unemployment rates. The following table summarizes the unemployment rates.

Average Annual Unemployment Rates			
	2021	2022	2023
State of Ohio	5.1	4.0	3.5
United States	5.4	3.7	3.6
Miami County	4.3	3.6	3.2

*Source: U.S. Bureau of Labor Statistics; Rates Not Seasonally Adjusted.*

The AA had a diverse mix of companies across many industries with a significant presence of services, retail trade, and manufacturing. Large employers in Miami County included Upper Valley Medical Center, Clopay Corporation, F&P America, and UTC Aerospace Systems.

### Competition

Competition for deposits in Miami County was strong with 15 total FDIC insured financial institutions operating 33 offices. According to the FDIC's Deposit Market Share Report as of June 30, 2023, Greenville Federal had \$32.5 million in deposits in Miami County which comprised 14.8 percent of total bank deposits. The bank had a deposit market share of 1.6 percent and was ranked 13<sup>th</sup> out of 15 financial institutions. The top competitors in Miami County were Fifth Third Bank, National Association (N.A.) with five branches and 28.7 percent market share, Park National Bank with four branches and 12.5 percent market share, and JPMorgan Chase Bank, N.A. with three branches and 11.9 percent market share.

Greenville Federal's primary business focus was home mortgage lending. There was strong competition for home mortgage loans during the evaluation period. Based on 2021 Peer Mortgage Data and 2015 ACS Census data, the bank ranked 16<sup>th</sup> out of 257 lenders in the Dayton MSA in residential home mortgage volume. As of the 2021 Peer Mortgage Data Report, Greenville Federal had 1.4 percent of the lending market share, based on the number of loans, lending approximately \$28.5 million. Based on 2021 Peer Mortgage Data, top mortgage lenders in the Dayton MSA included Union Savings Bank with 10.8 percent market share, Wright-Patt Credit Union, Inc. with 8.7 percent market share, and Fifth Third Bank, N.A. with 7.4 percent market share. During the evaluation period, 43.6 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Dayton MSA.

As stated above, the higher volume of originations in 2020 and 2021 was attributed to comparatively lower interest rates. In general, mortgage rates began to rise significantly in late 2021 and early 2022 after reaching historic lows during the COVID-19 pandemic. Based on 2023 Peer Mortgage Data and 2020 U.S. Census data, the bank ranked 27<sup>th</sup> out of 234 lenders in the Dayton MSA in residential home mortgage volume. As of the 2023 Peer Mortgage Data Report, Greenville Federal had almost one percent of the lending market share, based on the number of loans, lending approximately \$9 million. Based on 2023 Peer Mortgage Data, top mortgage lenders in the Dayton MSA included Wright-Patt Credit Union Inc. with 11.7 percent market share, Fifth Third Bank, N.A. with 7.1 percent market share, and Union Savings Bank with 4.9 percent market share. During the evaluation period, 43.3 percent of the bank's home mortgage loan originations and purchases inside the AAs were in the Dayton MSA.

### Community Contacts/Credit Needs

Examiners reviewed information provided from a recent interview with a community contact to understand the Dayton MSA's needs and opportunities. According to the contact, general needs include affordable housing, small dollar mortgage products, down payment assistance, capacity building funding and technical assistance for small community organizations, and multi-year funding for community

groups. In general, local financial institutions are adequately meeting the credit and CD needs of the community.

## **Scope of Evaluation in Ohio**

Examiners performed a full-scope review of both AAs, the OH Non-MSA and Dayton MSA. The data in the AAs was analyzed and presented as two AAs for the purposes of this evaluation. The OH Non-MSA represented the largest concentration of deposit and lending activity, with more weight placed on the OH Non-MSA in this evaluation. Home mortgage lending was the bank's primary lending product during the evaluation period. Examiners used 2021, 2022, and 2023 HMDA data for the home mortgage lending analysis, as discussed above. As part of the Lending Test, examiners also considered the SBA PPP loans originated in 2021 as CD loans.

## **LENDING TEST**

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

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance is good in the OH Non-MSA and is poor in the Dayton MSA.

In determining the ratings, examiners weighed demographic factors of the AAs that could affect the bank's ability to lend. These factors included competition from other financial institutions, the number of low- and moderate-income geographies, branch presence, and area demographics. The bank's main office is in an upper-income CT as of the 2020 U.S. Census, with the remaining offices in middle- and upper-income CTs. Performance related to CD lending had a positive effect on the bank's Lending Test rating.

## **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 major changes from the 2015 ACS to the 2020 U.S Census included one CT changing from moderate-income to low-income and one CT moving from moderate-income to middle-income in the OH Non-MSA. Therefore, there were no low-income geographies as of the 2015 ACS Census and no moderate-income geographies as of the 2020 U.S. Census in the OH Non-MSA. There were no low-income geographies in the Dayton MSA as of 2015 ACS Census or 2020 U.S. Census.

### **OH Non-MSA**

The geographic distribution of home mortgage loans in the OH Non-MSA was good.

Examiners considered Greenville Federal’s lack of offices in low- and moderate-income geographies in the analysis, as this lowers the volume of loans to be expected in comparison to banks with physical presence in low- and moderate-income geographies. Refer to the Description of Institution’s Operations in Ohio (OH Non-MSA) for more details.

### *2021*

The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

### *2022 – 2023*

The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied units housing located in those geographies and was below the aggregate percentage of all reporting lenders.

Examiners considered performance context factors such as the median age of housing stock and competition. As of the 2020 U.S. Census for 2023, the median age of housing stock was 84 years for low-income geographies. The cost of home ownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in the low-income geographies. A higher poverty rate (based on families below poverty) in the low-income geographies also contributed to lower lending in low-income geographies. For 2023, the percentage of families below poverty in low-income geographies was 24 percent. As of the 2023 Peer Mortgage Data, there was strong competition with 124 home mortgage lenders competing in the AA, with the top three lenders maintaining a combined home mortgage market share of 32.5 percent. According to the 2023 Peer Mortgage Data Report, the top five lenders in home mortgage loans in the one low-income geography (CT 5551.02) accounted for 51.4 percent of the lending market share. Greenville Federal was ranked 12<sup>th</sup> out of 32 lenders with a market share of 2.7 percent in the one low-income geography in Darke County.

### Dayton MSA

The geographic distribution of home mortgage loans in the Dayton MSA was poor.

Examiners considered Greenville Federal’s lack of offices in the moderate-income geographies in the analysis, as this lowers the volume of loans to be expected in comparison to banks with physical presence in the moderate-income geographies. According to the 2015 ACS Census, there were three moderate-income geographies near the City of Piqua. Greenville Federal did not operate an office in or near the City of Piqua where the three moderate-income geographies were located, and there were numerous other financial institutions in Piqua. Refer to the Description of Institution’s Operations in Ohio (Dayton MSA) for more details.

### *2021*

The percentage of home mortgage loans in moderate-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022 – 2023

The percentage of home mortgage loans in moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Examiners considered performance context factors such as the median age of housing stock and competition. As of the 2020 U.S. Census for 2023, the median age of housing stock was 76 years for moderate-income geographies. The cost of home ownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in the moderate-income geographies. A higher poverty rate (based on families below poverty) in the moderate-income geographies also contributed to lower lending in moderate-income geographies. For 2023, the percentage of families below poverty in moderate-income geographies was 14.1 percent. As of the 2023 Peer Mortgage Data, there was strong competition with 234 home mortgage lenders competing in the AA, with the top three lenders maintaining a combined home mortgage market share of 23.7 percent.

### ***Lending Gap Analysis***

Examiners reviewed summary reports and maps and analyzed the bank's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps in the OH Non-MSA. As discussed above, the bank's lending in moderate-income geographies in the Dayton MSA was poor.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels, 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.

#### OH Non-MSA

The bank's distribution of home mortgage loans to individuals of different income levels in the OH Non-MSA was good.

Examiners considered both the moderate Darke County poverty rate and housing affordability issues for low-income borrowers in the analysis of mortgage lending to low-income families as these factors represented a significant barrier to homeownership for low-income families.

2021

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

of home mortgage loans to moderate-income borrowers exceeded both the percentage of families and the aggregate percentage of all reporting lenders.

*2022 – 2023*

The percentage of home mortgage loans to low-income borrowers was well below the percentage of families and approximated the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of families and was near to the aggregate percentage of all reporting lenders.

### Dayton MSA

The bank's distribution of home mortgage loans to individuals of different income levels in the Dayton MSA was poor.

Examiners considered both the Miami County poverty rate and housing affordability issues for low-income borrowers in the analysis of mortgage lending to low-income families as these factors represented a significant barrier to homeownership for low-income families. Examiners also considered that the bank faced substantial competition from financial institutions with greater resources in the AA.

*2021*

The percentage of home mortgage loans to low-income borrowers was significantly below both the percentage of families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was well below both the percentage of families and the aggregate percentage of all reporting lenders.

*2022 – 2023*

The percentage of home mortgage loans to low-income borrowers was significantly below both the percentage of families and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was well below both the percentage of families and the aggregate percentage of all reporting lenders.

### **Community Development Lending**

Based on full-scope reviews, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, considering the bank's capacity and the need and availability of such opportunities for CD in the AAs. The bank was a leader in making CD loans. Performance related to CD activities had a positive effect on the bank's rating in the state. As discussed above under the Description of Institution, the SBA PPP loans were responsive to the credit needs of businesses during the evaluation period. Greenville Federal responded to customers facing financial hardship during the pandemic by participating in the SBA's PPP. In 2021, Greenville Federal originated a total of 191 SBA PPP loans providing \$7.4 million in critical funding to businesses located in Ohio. This PPP loan volume represented 36 percent of total tier 1 capital as of December 31, 2023. Additionally, the bank originated seven PPP loans outside the state of Ohio totaling \$159,390.

OH Non-MSA

The bank is a leader in making CD loans. Greenville Federal made 103 PPP loans totaling \$4.1 million, which represented 23.5 percent of allocated tier one capital.

Dayton MSA

The bank is a leader in making CD loans. Greenville Federal made 41 PPP loans totaling \$1.5 million, which represented 50.6 percent of allocated tier one capital.

Statewide/Regional Area

Because the bank was responsive to CD needs and opportunities in the full-scope areas, broader statewide and regional loans that do not have a purpose, mandate, or function to serve the AAs received consideration in the evaluation. Greenville Federal originated 34 PPP loans totaling \$1.5 million in Montgomery County, Ohio, which is part of the Dayton MSA. Montgomery County is contiguous to Darke and Miami Counties. Additionally, the bank originated 13 PPP totaling \$213,738 in other counties in Ohio. Greenville Federal made a total of 47 PPP loans totaling approximately \$1.8 million in the state of Ohio, which represented 8.5 percent of total tier one capital.

**Responses to Complaints**

The bank has not received any complaints about its CRA performance in helping to meet the AAs' credit needs during the evaluation period.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	1/1/21 to 12/31/23	
<b>Bank Products Reviewed:</b>	Home mortgage loans Community development loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>States - Ohio</b>		
OH Non-MSA	Full-Scope	Darke County, Ohio
Dayton, OH MSA 19430	Full-Scope	Miami County, Ohio

## Appendix B: Summary of State Ratings

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RATINGS: GREENVILLE FEDERAL	
Overall Bank:	Lending Test Rating
Greenville Federal	Satisfactory
MMSA or State:	
Ohio	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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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 (MD):** 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 (MSA):** 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

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### 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 30<sup>th</sup> 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

State of Ohio

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		
	#	\$	% 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
Dayton MSA	92	28,440,078	43.6	6,318	0.0	0.0	0.0	13.8	1.1	10.1	55.1	60.9	50.1	31.1	38.0	39.8	0.0	0.0	0.0
OH Non-MSA	119	20,049,016	56.4	1,576	0.0	0.0	0.0	11.4	10.1	12.1	74.4	78.2	74.0	14.2	11.8	14.0	0.0	0.0	0.0
<b>Total</b>	<b>211</b>	<b>48,489,094</b>	<b>100.0</b>	<b>7,894</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>12.9</b>	<b>6.2</b>	<b>10.5</b>	<b>61.7</b>	<b>70.6</b>	<b>54.9</b>	<b>25.3</b>	<b>23.2</b>	<b>34.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.

Greenville Federal (Charter 700641) excluded from Aggregate Data.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
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
Dayton MSA	78	25,169,210	43.3	2,995	0.0	0.0	0.0	12.8	5.1	11.8	51.3	41.0	49.4	35.9	53.8	38.8	0.0	0.0	0.0
OH Non-MSA	102	13,289,299	56.7	863	4.3	4.9	8.3	0.0	0.0	0.0	73.0	76.5	75.6	22.7	18.6	16.1	0.0	0.0	0.0
<b>Total</b>	<b>180</b>	<b>38,458,509</b>	<b>100.0</b>	<b>3,858</b>	<b>1.4</b>	<b>2.8</b>	<b>1.9</b>	<b>8.5</b>	<b>2.2</b>	<b>9.2</b>	<b>58.6</b>	<b>61.1</b>	<b>55.3</b>	<b>31.5</b>	<b>33.9</b>	<b>33.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Greenville Federal (Charter 700641) excluded from Aggregate Data.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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
Dayton MSA	92	28,440,078	43.6	6,318	18.4	1.1	7.9	18.1	10.9	20.0	22.1	14.1	22.1	41.4	65.2	32.4	0.0	8.7	17.6
OH Non-MSA	119	20,049,016	56.4	1,576	21.2	6.7	7.9	17.5	27.7	22.8	24.1	17.6	23.8	37.3	47.1	30.0	0.0	0.8	15.5
<b>Total</b>	<b>211</b>	<b>48,489,094</b>	<b>100.0</b>	<b>7,894</b>	<b>19.3</b>	<b>4.3</b>	<b>7.9</b>	<b>17.9</b>	<b>20.4</b>	<b>20.6</b>	<b>22.7</b>	<b>16.1</b>	<b>22.4</b>	<b>40.0</b>	<b>55.0</b>	<b>31.9</b>	<b>0.0</b>	<b>4.3</b>	<b>17.2</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%.*

*Greenville Federal (Charter 700641) excluded from Aggregate Data.*

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
Dayton MSA	78	25,169,210	43.3	2,995	15.3	3.8	11.3	18.0	10.3	21.0	24.1	20.5	21.8	42.6	55.1	30.5	0.0	10.3	15.4
OH Non-MSA	102	13,289,299	56.7	863	18.2	9.8	10.0	18.8	24.5	27.5	20.8	29.4	22.6	42.2	32.4	27.3	0.0	3.9	12.6
<b>Total</b>	<b>180</b>	<b>38,458,509</b>	<b>100.0</b>	<b>3,858</b>	<b>16.3</b>	<b>7.2</b>	<b>11.0</b>	<b>18.3</b>	<b>18.3</b>	<b>22.5</b>	<b>22.9</b>	<b>25.6</b>	<b>22.0</b>	<b>42.5</b>	<b>42.2</b>	<b>29.8</b>	<b>0.0</b>	<b>6.7</b>	<b>14.8</b>

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

*Greenville Federal (Charter 700641) excluded from Aggregate Data.*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.