



PUBLIC DISCLOSURE

June 9, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank of Ohio
Charter Number 700041

140 North Columbus Street
Galion, OH 44833-1909

Office of the Comptroller of the Currency

200 Public Square Suite 1610
Cleveland, OH 44114-2301

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 reasonable distribution of home mortgage loans among borrowers of different incomes and a reasonable geographic distribution of home mortgages loans in the state of Ohio.
- A substantial majority of the bank's loans are inside its assessment areas (AAs) and meets the criteria for satisfactory performance.

Loan-to-Deposit Ratio

Considering First Federal Bank of Ohio's (FFBO or bank) size, financial condition, and the credit needs of the AAs, the bank's LTD ratio is less-than-reasonable.

FFBO's LTD ratio is calculated on a bank-wide basis. Since the previous CRA examination, the bank's average quarterly LTD ratio was 49.5 percent, with quarterly ratios ranging from a low of 47.2 percent in the third quarter of 2023 to a high of 53.9 percent in the fourth quarter of 2020. In comparison, the quarterly average LTD ratio for other banks of similar asset size was 82.1 percent and ranged between 48.5 percent and 112.2 percent.

Lending in Assessment Area

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

FFBO originated and purchased 91.2 percent by number and 90.6 percent by dollar amount of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	331	91.18	32	8.82	363	40,735	90.63	4,210	9.37	44,945
Total	331	91.18	32	8.82	363	40,735	90.63	4,210	9.37	44,945
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%										

Description of Institution

FFBO is an intrastate federally chartered mutual thrift operating seven full-service branches and two limited service branches in north central Ohio. In addition to the main office branch located in Galion, Ohio, FFBO operates full-service branches in downtown Mansfield, south Mansfield, Shelby, Mt. Gilead, Cardington, and Sandusky, Ohio. FFBO also operates a limited-service branch in Galion, Ohio, and a loan production office located in Tiffin, Ohio. As of December 31, 2024, the bank reported total assets of \$283.8 million and tier 1 capital of \$39.5 million, or 13.9 percent of total assets.

During the evaluation period, FFBO operated in one state (Ohio) and designated three AAs. The Columbus Metropolitan Statistical Area (MSA) AA includes all of Morrow County. The Mansfield MSA AA includes all of Richland County. FFBO's OH Non-MSA AA includes the contiguous counties of Crawford, Erie, Huron, Sandusky, and Seneca.

The bank's primary loan product was residential real estate loans. The bank's loan portfolio increased 7.7 percent from \$109.2 million as of December 31, 2021, to \$117.5 million as of December 31, 2024, and 97.0 percent of the loan portfolio is secured by real estate. The loan portfolio is comprised of 75.9 percent residential mortgages, 14.1 percent nonfarm nonresidential loans, 5.1 percent construction and development loans, 2.8 percent consumer loans, 1.9 percent farmland loans, and 0.2 percent commercial and industrial loans.

FFBO offers traditional lending products, including home mortgage loans, home equity loans, home equity lines of credit, second mortgages, construction loans, commercial real estate loans, and Small Business Administration (SBA) loans. The bank also offers auto loans, Recreational Vehicle (RV) loans, and boat loans. The bank's consumer deposit-related products and services include checking, savings, and money market accounts, certificates of deposit, individual retirement accounts, online banking, bill pay, mobile banking, safe deposit boxes, and ATM services.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated January 25, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank using small bank performance criteria, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the lending test is January 1, 2022, through December 31, 2024. Examiners specifically reviewed mortgage lending for this evaluation, as this is the bank's primary product. The OCC compared the bank's performance to aggregate lender data as well as the 2024 census data.

Selection of Areas for Full-Scope Review

Examiners performed a full-scope review of the bank's Columbus MSA AA, Mansfield MSA AA, and OH Non-MSA AA.

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same MSA 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.

Ratings

FFBO’s overall rating is based on the bank’s performance within its AAs. The OCC weighed information from the following performance criteria when analyzing the bank’s primary lending products: LTD ratio, lending within the AAs, lending to borrowers of different incomes, and the geographic distribution of loans. Refer to the “Scope” paragraph within the “State” section of this document 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) (March 29, 2024) in determining a national banks 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 (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Ohio

CRA rating for the State of Ohio¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans to borrowers of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans is reasonable.
- A substantial majority of the bank's loans are inside its AAs.
- The bank did not receive any complaints regarding its performance in helping meet the credit needs within its AAs.

Description of Institution's Operations in Ohio

Columbus MSA AA

FFBO's Columbus MSA AA includes Morrow County, Ohio. The AA is comprised of contiguous geographies and does not arbitrarily exclude any low- or moderate-income CTs based on the designation of their income level or the demographic make-up of the CTs. Based on 2024 census data, the AA consists of nine census tracts (CTs) and includes no low-income CTs, four moderate-income CTs, four middle-income CTs, and one upper-income CT.

As of the evaluation period, the bank operated two full-service branches within the AA: one in the city of Mt. Gilead, OH, and the other in the city of Cardington, OH. The offices are open Monday through Saturday, offer drive through-services, and have non-deposit taking ATMs which offer 24-hour accessibility. Based on 2024 census data, both branches are located in moderate-income CTs. The bank did not open or close any branch locations during the evaluation period.

Competition for deposits within the AA is moderate, with six institutions operating in a mostly rural area, with a population of 34,950. FFBO's competitors consist of two large banks and two larger community banks. According to the 2024 Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, these institutions operate four offices in the AA. This does not include credit unions or other financial service providers. FFBO ranked fourth in terms of total deposit market share, with 15.2 percent, or \$50.5 million, of total deposits. The largest competitors for deposits include The Park National Bank and JPMorgan Chase Bank, NA, which hold a combined 54.6 percent of total deposits.

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

Significant competition for loans exists in the AA. Based on the 2023 aggregate mortgage loan data, 141 lenders originated or purchased home mortgage loans within the AA. The top four home mortgage loan lenders in the AA include a large bank, a larger community bank, and two mortgage companies, which hold a combined 26.2 percent share of the market. FFBO ranked fifth in terms of market share with \$3.2 million in loans for 2023.

The unemployment level at the beginning of 2022 for the AA was 4.5 percent, decreasing to 4.1 percent as of year-end 2024. In comparison, the Ohio unemployment rate ranged from 4.7 percent at the beginning of 2022 to 4.2 percent at the end of 2024. The largest cities in the AA are Mount Gilead and Cardington. Prominent industries include manufacturing, health care and social assistance, educational services and retail trade. Major employers in Morrow County include Cardington Yutaka, Dollar Tree Warehouse, and Morrow County Hospital.

The OCC conducted one community contact with a nonprofit agency that helps plan and coordinate efforts to fight poverty in the community using public and private resources. The contact provides services to individuals and families with education needs, financial administration needs, and utility and weatherization assistance. Opportunities for participation from local financial institutions include volunteering for the Volunteer Income Tax Assistance (VITA) program, retail banking services, no-cost checking accounts, general operating support, and volunteers for financial education.

Demographic information for the full-scope assessment area is contained in the table below.

Demographic Information						
Assessment Area(s) - Columbus MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.00	44.44	44.44	11.11	0.00
Population by Geography	34,950	0.00	49.52	45.04	5.44	0.00
Housing Units by Geography	14,337	0.00	49.40	44.60	6.00	0.00
Owner-Occupied Housing by Geography	10,773	0.00	48.23	46.38	5.38	0.00
Occupied Rental Units by Geography	2,291	0.00	58.36	34.05	7.59	0.00
Vacant Units by Geography	1,273	0.00	43.21	48.47	8.33	0.00
Businesses by Geography	962	0.00	50.00	41.79	8.21	0.00
Farms by Geography	127	0.00	50.39	43.31	6.30	0.00
Family Distribution by Income Level	9,685	19.66	28.18	24.61	27.56	0.00
Household Distribution by Income Level	13,064	20.52	18.25	26.61	34.62	0.00
Unemployment rate (%)	2.66	0.00	3.86	1.61	0.00	0.00
Households Below Poverty Level (%)	7.78	0.00	7.94	7.27	10.21	0.00
Median Family Income (18140 - Columbus, OH MSA)		\$84,088	Median Housing Value			\$167,500
Median Family Income (18140 - Columbus, OH MSA) for 2024		\$103,300	Median Gross Rent			\$782
			Families Below Poverty Level			5.91
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Mansfield MSA AA

FFBO's Mansfield MSA AA includes Richland County, Ohio. The AA is comprised of contiguous geographies and does not arbitrarily exclude any low- or moderate-income CTs based on the designation of their income level or the demographic make-up of the CTs. Based on 2024 census data, the AA consists of 30 CTs and includes three low-income CTs, seven moderate-income CTs, 13 middle-income CTs, six upper-income CTs, and one CT with no income assigned.

As of the evaluation period, the bank operated three full-service branches within the AA: two in the city of Mansfield, OH, and the other in the city of Shelby, OH. The offices are open Monday through Saturday, offer drive through-services, and have non-deposit taking ATMs to offer 24-hour accessibility. Based on 2024 census data, one Mansfield branch is located in a middle-income CT, the other Mansfield branch is located in an upper-income CT, and the Shelby branch is located in an upper-income CT. The bank did not open or close any branch locations during the evaluation period.

Competition for deposits within the AA is considerable, with 12 institutions operating in a mostly rural area, with a population of 124,936. FFBO's competitors include four large banks and several larger community banks. According to the 2024 FDIC Deposit Market Share Report, these institutions operate 35 offices in the AA. This does not include credit unions or other financial service providers. FFBO ranked seventh in terms of total deposit market share, with 3.1 percent, or \$76.5 million, of total deposits. The largest competitors for deposits include Mechanics Bank and The Park National Bank, which hold a combined 58.5 percent of total deposits.

Significant competition for loans exists in the AA. Based on the 2023 aggregate mortgage loan data, 184 lenders originated or purchased home mortgage loans within the AA. The top five home mortgage lenders in the AA include a large bank, two community banks, and two mortgage companies, which hold a combined 45.6 percent share of the market. FFBO ranked 23rd in terms of market share with \$2.3 million in loans for 2023.

The unemployment level at the beginning of 2022 for the AA was 5.3 percent, decreasing to 5.1 percent as of year-end 2024. In comparison, the Ohio unemployment rate ranged from 4.7 percent at the beginning of 2022 to 4.2 percent at the end of 2024. The largest cities in the AA are Mansfield and Shelby. Prominent industries include manufacturing, health care and social assistance, educational services and retail trade. Major employers in Richland County include Ohio Health, Charter Next Generation, and Avita Health System.

Demographic information for the full-scope assessment area is contained in the table below.

Demographic Information						
Assessment Area(s) - Mansfield MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	10.00	23.33	43.33	20.00	3.33
Population by Geography	124,936	8.61	14.17	47.87	25.33	4.02
Housing Units by Geography	54,149	10.22	16.74	49.02	23.95	0.07

Owner-Occupied Housing by Geography	32,762	6.90	9.06	55.07	28.94	0.03
Occupied Rental Units by Geography	16,205	16.53	26.38	38.44	18.55	0.10
Vacant Units by Geography	5,182	11.48	35.10	43.86	9.32	0.23
Businesses by Geography	4,212	5.27	21.04	43.16	29.20	1.33
Farms by Geography	246	6.10	6.50	54.07	33.33	0.00
Family Distribution by Income Level	30,135	20.51	17.11	22.58	39.80	0.00
Household Distribution by Income Level	48,967	23.46	16.45	18.55	41.53	0.00
Unemployment rate (%)	5.69	7.10	15.79	4.02	3.23	42.50
Households Below Poverty Level (%)	14.38	25.21	31.52	10.51	7.70	0.00
Median Family Income (31900 - Mansfield, OH MSA)	\$63,284		Median Housing Value			\$101,750
Median Family Income (31900 - Mansfield, OH MSA) for 2024	\$76,000		Median Gross Rent			\$698
			Families Below Poverty Level			10.03
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Ohio Non-MSA AA

FFBO's OH Non-MSA AA includes the Ohio counties of Crawford, Erie, Huron, Sandusky, and Seneca. The AA is comprised of contiguous geographies and does not arbitrarily exclude any low- or moderate-income CTs based on the designation of their income level or the demographic make-up of the CTs. Based on 2024 census data, the AA consists of 75 CTs and includes one low-income CT, 17 moderate-income CTs, 48 middle-income CTs, eight upper-income CTs, and one CT with no income assigned.

As of this evaluation, the bank operated two full-service branches within the AA: one in the city of Galion, OH, which is the bank's main office, and the other in the city of Sandusky, OH. The bank also operates a limited services branch in the city of Galion, OH. These three offices are open Monday through Saturday, offer drive through-services, and have non-deposit taking ATMs to offer 24-hour accessibility. FFBO operates a separate loan production office located in the city of Tiffin, Ohio, which is open Monday through Friday. Based on 2024 census data, the main office branch is located in a middle-income CT, the Sandusky branch is located in an upper-income CT, the limited-services branch is located in a middle-income CT, and the loan production office is located in a moderate-income CT. The bank did not open or close any branch locations during the evaluation period.

Competition for deposits within the AA is considerable, with 24 institutions operating in a mostly rural area, with a population of 290,177. FFBO's competitors include five large banks and several larger community banks. According to the 2024 FDIC Deposit Market Share Report, these institutions operate 94 offices in the AA. This does not include credit unions or other financial service providers. FFBO ranked 17th in terms of total deposit market share, with 1.2 percent, or \$100.8 million, of total deposits. The largest competitors for deposits include Sutton Bank, Civista Bank, and The Croghan Colonial Bank, which hold a combined 47.9 percent of total deposits.

Significant competition for loans exists in the AA. Based on the 2023 aggregate mortgage loan data, 217 lenders originated or purchased home mortgage loans within the AA. The top five home mortgage lenders in the AA include a large bank, three mortgage companies, and a credit union, which hold a combined 28.3 percent share of the market. FFBO ranked 26th in terms of market share with \$3.6 million in loans for 2023.

The unemployment level at the beginning of 2022 for the AA of Crawford, Erie, Huron, Sandusky, and Seneca counties was 5.2, 7.1, 7.3, 5.3, and 4.7 percent respectively, decreasing to 5.2, 5.3, 6.0, 5.1, and 4.6 percent respectively, as of year-end 2024. In comparison, the Ohio unemployment rate ranged from 4.7 percent at the beginning of 2022 to 4.2 percent at the end of 2024. Prominent industries include manufacturing, health care and social assistance, agriculture, accommodation and food services, educational services, and retail trade. Major employers in the AA include Avita Health System, Imasen Bucyrus Technology, Timken Company, Firelands Medical Center, Cedar Point, Cleveland Clinic, Fisher-Titus Medical Center, Berry Global, Pepperidge Farms, Whirlpool Corporation, Revere Plastics, Church and Dwight, Mercy Health, and National Machinery.

The OCC conducted two community contacts with nonprofit agencies that focus on affordable housing and social services. Opportunities for participation from local financial institutions include funding for homeownership counseling, down payment assistance, financial literacy volunteers, VITA program volunteers, small dollar loan programs for auto purchases and emergency auto repairs, and funding for mental health resources and treatment.

Demographic information for the full-scope assessment area is contained in the table below.

Demographic Information						
Assessment Area(s) - OH Non-MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	75	1.33	22.67	64.00	10.67	1.33
Population by Geography	290,177	0.89	20.57	67.16	11.39	0.00
Housing Units by Geography	133,714	1.03	22.14	65.20	11.63	0.00
Owner-Occupied Housing by Geography	83,964	0.63	17.79	68.58	12.99	0.00
Occupied Rental Units by Geography	33,917	1.86	32.57	58.44	7.12	0.00
Vacant Units by Geography	15,833	1.36	22.84	61.71	14.08	0.00
Businesses by Geography	9,659	1.19	21.37	65.11	12.33	0.00
Farms by Geography	872	0.23	6.31	74.89	18.58	0.00
Family Distribution by Income Level	76,342	18.35	20.38	23.45	37.83	0.00
Household Distribution by Income Level	117,881	21.89	17.54	20.29	40.27	0.00
Unemployment rate (%)	4.91	14.48	7.24	4.24	3.95	0.00
Households Below Poverty Level (%)	12.24	35.28	19.11	10.54	6.70	0.00
Median Family Income (41780 - Sandusky, OH MSA)	\$75,043		Median Housing Value			\$113,800
Median Family Income (Non-MSAs - OH)	\$66,160		Median Gross Rent			\$729
Median Family Income (41780 - Sandusky, OH MSA) for 2024	\$88,300		Families Below Poverty Level			8.55
Median Family Income (Non-MSAs - OH) for 2024	\$81,600					

FFIEC File - 2020 Census

FFIEC File - 2024 Census

2024 Dun & Bradstreet SBSF Demographics

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification

Scope of Evaluation in Ohio

This analysis reflects a full-scope review of the Columbus MSA AA, Mansfield MSA AA, and the OH Non-MSA AA. Examiners considered the number of home mortgage loans originated or purchased by the bank from January 1, 2022, through December 31, 2024. Examiners also considered any factors affecting the bank's ability to lend in its AA during the evaluation period, such as demographic and market share information.

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the AAs is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table 7 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.

Columbus MSA AA

The bank's distribution of home mortgage loans among geographies of different income levels throughout the AA is reasonable. There are no low-income CTs in the AA. FFBO originated 51.2 percent of its home mortgage loans in moderate-income CTs. This is slightly above the percentage of the AA's owner-occupied housing units in moderate-income CTs of 48.2 percent and the aggregate home mortgage lending level of 50.1 percent.

Mansfield MSA

The bank's distribution of home mortgage loans among geographies of different income levels throughout the AA is reasonable. FFBO originated 7.0 percent of its home mortgage loans in low-income CTs. This is near the percentage of the AA's owner-occupied housing units in low-income CTs of 6.9 percent and the aggregate home mortgage lending level of 7.0 percent. FFBO originated 9.3 percent of its home mortgage loans in moderate-income CTs. This is slightly above the percentage of the AA's owner-

occupied housing units in moderate-income CTs of 9.1 percent, but slightly below the aggregate home mortgage lending level of 9.9 percent.

OH Non-MSA AA

The bank's distribution of home mortgage loans among geographies of different income levels throughout the AA is reasonable. FFBO did not originate any of its home mortgage loans in low-income CTs; however, the percentage of the AA's owner-occupied housing units and the aggregate home mortgage lending levels in low-income CTs are minimal at 0.6 percent and 0.9 percent, respectively. FFBO originated 32.5 percent of its home mortgage loans in moderate-income CTs. This is notably above the percentage of the AA's owner-occupied housing units in moderate-income CTs of 17.8 percent and the aggregate home mortgage lending level of 16.6 percent.

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 8 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.

Columbus MSA AA

The bank's distribution of home mortgage loans to low- and moderate-income borrowers throughout the AA is reasonable. FFBO originated 20.7 percent of its home mortgage loans to low-income borrowers. This is above the percentage of the AA's low-income families of 19.7 percent and the aggregate home mortgage lending level of 13.1 percent. FFBO originated 30.5 percent of its home mortgage loans in moderate-income CTs. This is above the percentage of the AA's moderate-income families of 28.2 percent and the aggregate home mortgage lending level of 25.2 percent.

Mansfield MSA

The bank's distribution of home mortgage loans to low- and moderate-income borrowers throughout the AA is reasonable. FFBO originated 14.0 percent of its home mortgage loans to low-income borrowers. While this is below the percentage of the AA's low-income families of 20.5 percent, it is above the aggregate home mortgage lending level of 9.1 percent. FFBO originated 29.1 percent of its home mortgage loans in moderate-income CTs. This is notably above the percentage of the AA's moderate-income families of 17.1 percent and the aggregate home mortgage lending level of 22.2 percent.

OH Non-MSA

The bank's distribution of home mortgage loans to low- and moderate-income borrowers throughout the AA is reasonable. FFBO originated 19.6 percent of its home mortgage loans to low-income borrowers. This is above the percentage of the AA's low-income families of 18.4 percent and the aggregate home mortgage lending level of 11.0 percent. FFBO originated 30.1 percent of its home mortgage loans in

moderate-income CTs. This is notably above the percentage of the AA's moderate-income families of 20.4 percent and the aggregate home mortgage lending level of 24.7 percent.

Responses to Complaints

FFBO did not receive any complaints pertaining to the Community Reinvestment Act 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:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Ohio		
Columbus MSA AA	Full-scope	Morrow County
Mansfield MSA AA	Full-scope	Richland County
OH Non-MSA AA	Full-scope	Crawford, Erie, Huron, Sandusky, and Seneca Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
First Federal Bank of Ohio	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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 CD loans and qualified investments, branch distribution, and CD services).

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

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

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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. 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 AA.
- Table 10. 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 11. 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 AA.

- Table 12. 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 \$500,000) 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 13. 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 14. 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/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Columbus MSA	82	11,470	24.77	1,992	--	--	--	48.23	51.22	50.10	46.38	35.37	44.28	5.38	13.41	5.65	--	--	--
Mansfield MSA	86	9,980	25.98	5,748	6.90	6.98	6.96	9.06	9.30	9.88	55.07	56.98	53.04	28.94	26.74	30.11	0.03	--	--
OH Non-MSA	163	19,285	49.24	11,897	0.63	--	0.88	17.79	32.52	16.60	68.58	52.15	59.45	12.99	15.34	23.06	--	--	--
Total	331	40,735	100.00	19,637	2.19	1.81	2.57	18.12	31.12	18.03	63.23	49.24	56.04	16.45	17.82	23.36	0.01	--	--
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Columbus MSA	82	11,470	24.77	1,992	19.66	20.73	13.10	28.18	30.49	25.15	24.60	28.05	22.94	27.56	20.73	25.70	--	--	13.10
Mansfield MSA	86	9,980	25.98	5,748	20.51	13.95	9.06	17.11	29.07	22.23	22.59	20.93	24.39	39.80	27.91	30.20	--	8.14	14.11
OH Non-MSA	163	19,285	49.24	11,897	18.35	19.63	11.04	20.38	30.06	24.66	23.44	22.70	23.74	37.83	26.99	26.80	--	0.61	13.76
Total	331	40,735	100.00	19,637	19.02	18.43	10.67	20.18	29.91	24.00	23.32	23.56	23.85	37.48	25.68	27.68	--	2.42	13.80
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			