



## PUBLIC DISCLOSURE

September 16, 2024

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Signature Bank, National Association  
Charter Number 24264

4607 West Sylvania Avenue  
Toledo, OH 43623

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 community development test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on a majority of lending occurring in the bank's assessment area (AA), a reasonable loan-to-deposit ratio (LTD), reasonable geographic distribution of small business loans, and a reasonable distribution of small business loans among businesses of different sizes.
- The Community Development (CD) Test rating is based on excellent responsiveness to community needs through qualified CD loans, investments, and services and its capacity to participate.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD is reasonable.

Signature Bank, National Association (SB or the bank) LTD ratio is calculated on a bank-wide basis and meets the standard for satisfactory performance. During the evaluation period, the bank's average quarterly LTD ratio was 77.18 percent, with quarterly ratios ranging from a low of 68.8 percent in the fourth quarter of 2021 to a high of 89.4 percent in the fourth quarter of 2023. In comparison, the average quarterly LTD ratio for the one similarly situated institution in the bank's AA was 77.65 percent.

### Lending in Assessment Area

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

The bank originated 70.8 percent by number and 71.3 percent by dollar volume of its total loans to small businesses within its AA during the evaluation period. This analysis is performed at the bank level rather than the AA level resulting in a positive impact on the bank's overall geographic distribution of lending by income level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans (000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2021	511	77.5	148	22.5	659	108,662	77.8	30,918	22.2	139,580
2022	174	61.1	111	38.9	285	58,053	65.5	30,593	34.5	88,647
2023	162	64.3	90	35.7	252	46,240	65.8	24,012	34.2	70,251
<b>Total</b>	<b>847</b>	<b>70.8</b>	<b>349</b>	<b>29.2</b>	<b>1196</b>	<b>212,955</b>	<b>71.3</b>	<b>85,523</b>	<b>28.7</b>	<b>298,478</b>
<i>Source: 1/1/2021 to 12/31/2023 Bank Loan Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

SB is an intrastate community bank headquartered in Toledo, Ohio. It is a wholly owned subsidiary of Signature Bancorp Inc., a one bank holding company, also headquartered in Toledo, Ohio. According to the Report of Condition and Income, SB reported total assets of \$1.23 billion as of December 31, 2023.

SB offers traditional banking products and services, but primarily serves commercial borrowers and their principal owners in the Toledo AA. The bank's loan portfolio grew 5.15 percent during the evaluation period. As of December 31, 2023, the loan portfolio totaled \$946.1 million, 58.2 percent of which is secured by real estate. The loan portfolio is comprised of 31.59 percent commercial loans, 36.3 percent non-farm nonresidential properties, 7.02 percent other loans, such as loans for purchasing securities, 10.54 percent residential mortgages, 4.3 percent multi-family loans, 5.74 percent construction or land development loans, 0.80 percent home equity lines of credit (HELOCs), and less than 1.0 percent of consumer loans.

During the evaluation period, SB operated in one AA, which is contiguous. The Toledo, Ohio AA includes all of Lucas County and a portion of Wood County and is part of the Toledo Metropolitan Statistical Area (MSA).

There are no legal, financial, or other factors impeding SB's ability to help meet the credit needs of the communities it serves. The bank received a "Satisfactory" rating on their previous CRA evaluation dated July 6, 2021.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated the bank's record of meeting the credit needs of its AA using the Intermediate Small Bank CRA evaluation procedures, which include a Lending Test and Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its small business lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through qualified investments, donations, and services. The evaluation period for lending and CD activity covers January 1, 2021, to December 31, 2023.

The OCC evaluated SB's lending performance based on its primary loan product of business loans. While the bank offers home mortgage loans, HELOCs, and consumer loans, these loans are not a primary lending focus for the bank. As a result, examiners did not consider these as a part of the evaluation as an analysis would not be meaningful.

### **Selection of Areas for Full-Scope Review**

SB has one AA in Ohio, and examiners performed a full-scope review of that AA. Please refer to *Appendix A, Scope of Examination*, for more information on the full-scope review of the AA.

### **Ratings**

The bank's overall rating is based on performance within the bank's AA. The state rating is based on the bank's performance in the bank's AA that received a full-scope review.

### **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC has not identified that this institution 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: Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Outstanding**

The major factors that support this rating include:

- The bank's geographic distribution of small business loans is reasonable.
- The bank exhibits a reasonable distribution of loans to small businesses of different sizes.
- The bank's level of CD loans and services is excellent.
- The bank made an adequate level of CD investments.
- The bank did not receive any complaints regarding its performance in helping meet the credit needs within its AA during the evaluation period.

### **Description of Institution's Operations in Ohio**

During the evaluation period, SB operated a single full-service branch office in its AA located in the state of Ohio. The branch is located in an upper income tract in Lucas County. The branch is open Monday through Friday between the hours of 8:00AM through 5:00PM. The bank did not open or close any branches during the evaluation period.

SB's principal line of business is the origination of business loans. SB offers an array of cash management accounts and business banking services. Additionally, the bank offers several other retail banking services to clientele such as residential mortgages, HELOCs, home improvement loans, and consumer loans. Given the business services-oriented focus of the bank, consumer loans are not a lending focus of the bank and are used to supplement and deepen existing commercial relationships.

SB's consumer deposit-related products include checking, money market accounts, certificates of deposit, mobile and online banking, and bill pay. Similarly, business-related products and services include checking, savings, business money market accounts, investment savings accounts, certificates of deposit, courier services, online and mobile banking, credit cards, and foreign currency. SB does not own or operate any ATMs and does not offer drive-thru teller services. The bank offers ATM/debit cards to its customers and reimburses them up to \$30.00 per month in ATM fees.

**Toledo AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Toledo 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)	140	25.0	17.9	34.3	22.1	0.7
Population by Geography	497,633	15.0	16.1	38.2	30.7	0.0
Housing Units by Geography	228,610	16.7	16.9	38.7	27.7	0.0
Owner-Occupied Units by Geography	126,397	8.1	14.0	41.4	36.5	0.0
Occupied Rental Units by Geography	76,340	24.7	19.3	38.2	17.7	0.0
Vacant Units by Geography	25,873	35.2	23.7	26.9	14.2	0.0
Businesses by Geography	32,039	14.3	10.5	36.5	38.7	0.0
Farms by Geography	761	6.3	10.0	37.6	46.1	0.0
Family Distribution by Income Level	122,956	24.4	16.4	18.9	40.2	0.0
Household Distribution by Income Level	202,737	26.7	15.5	15.9	41.9	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$110,611
			Median Gross Rent			\$684
			Families Below Poverty Level			15.1%
<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>						

As of the 2015 ACS Census data, the AA had 140 Census Tracts (CT), comprised of 35 low-income CTs, 25 moderate-income CTs, 48 middle-income CTs, and 31 upper-income CTs. The AA had one CT with no income assigned.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Toledo 2022-2023 Combined</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)	183	14.2	23.5	27.9	27.9	6.6
Population by Geography	498,121	9.8	19.5	28.8	37.2	4.6
Housing Units by Geography	230,740	12.4	21.2	30.0	32.0	4.4
Owner-Occupied Units by Geography	126,676	5.9	17.5	31.8	42.3	2.5
Occupied Rental Units by Geography	80,333	18.7	25.9	28.9	19.8	6.8
Vacant Units by Geography	23,731	25.4	25.1	24.5	18.6	6.4
Businesses by Geography	65,993	9.1	18.1	25.5	37.2	10.2
Farms by Geography	1,557	6.2	16.6	25.8	44.9	6.5
Family Distribution by Income Level	122,705	23.9	16.2	19.3	40.5	0.0
Household Distribution by Income Level	207,009	26.2	15.5	16.7	41.6	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$70,917	Median Housing Value			\$124,138
			Median Gross Rent			\$773
			Families Below Poverty Level			12.4%
<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>						

As of the 2020 U.S. Census data, there was an increase in the number of CTs within the AA from 140 to 183. Low-income CTs decreased by nine, moderate-income CTs increased by 18, middle-income CTs increased by three, upper-income CTs increased by 20, and the number of CTs with no income assigned increased by 11.

The AA is highly competitive with a mixture of community banks and large banks serving the area. Per the June 30, 2023, FDIC market share report there are 22 institutions operating in the AA maintaining 156 offices in the market. This does not include credit unions or other financial service providers also operating in the area. Signature Bank, N.A. ranks sixth in terms of market share with 6.89 percent of available insured deposits totaling \$1.07 billion. The largest competitors for deposits include The Huntington National Bank, Fifth Third Bank, Key Bank, PNC Bank, and Waterford Bank. Collectively these institutions hold 69.7 percent of the deposit market. Signature's market share increased 0.25 percent over the examination period.

Competition for loans in the Toledo AA is high with a mixture of community and large banks serving the area. Per the 2022 Toledo AA Market share report, Signature Bank, N.A. ranks 59<sup>th</sup> out of the top 80 institutions lending in the AA with a 0.38 percent market share. The top five lenders are large banks, which account for 55.8 percent by loan count and 14.9 percent by business loan volume within the AA. Signature is not required to report its small business loan data.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2023 Dunn & Bradstreet (D&B) data, 87.9 percent of businesses in the AA report less than \$0.5 million of revenue and 60.5 percent of businesses have fewer than five employees. 93.1 percent of businesses operate from a single location with only 1.3 percent of businesses headquartered in the AA. Major employers in the area include ProMedica Health Systems, Mercy Health Partners, and The University of Toledo.

Moody's Analytics reports the AA's economy has slowed from a brisk post-pandemic expansion and continues to underperform compared to the rest of the state of Ohio. Per the Bureau of Labor statistics (BLS) the unemployment rate in the state of Ohio at the beginning of 2021 was 6.7 percent declining to 3.5 percent at the year's end. The unemployment rate continued to decline with sporadic monthly increases during the evaluation period as the nation recovered from the pandemic ultimately dropping to 3.1 percent in December 2023. Comparatively, the Toledo area lagged the state of Ohio with the unemployment level of 7.4 percent in January 2021 declining to 3.7 percent for December 2021. Unemployment rates in the Toledo MSA continued to decline over the balance of the review period to 3.4 percent in December 2023, still exceeding the state of Ohio.

The OCC conducted one community contact that administers several CD programs including economic development, financial opportunity (education) centers for low- or moderate-income (LMI) individuals, affordable housing, repairing and rehabbing homes for LMI families. There is a high level of competition in the AA from larger banks, such as Huntington and Fifth Third bank to participate, lend, or invest in CD activities. Areas of opportunities include grants for home repairs for low to moderate income clients, down payment assistance, smaller loan amounts to support smaller businesses, and financial operating support.



## **Scope of Evaluation in Ohio**

The OCC evaluated Signature Bank's performance in the state of Ohio by performing a full-scope review of the bank's Toledo AA. Examiners analyzed lending from January 1, 2021, through December 31, 2023, for the primary lending product. Based upon the strategic plan, reports of lending activity over the review period, Reports of Condition and Income, and discussion with senior management, the OCC determined the bank's primary area of lending focus is business loans. In developing conclusions, examiners considered factors within the AA's community profile that would impact the bank's ability to lend within the AA, including demographic and market share information.

For comparative purposes for business loans, examiners used 2015 ACS data for 2021 and 2020 U.S. Census Bureau demographic and aggregate data for 2022-2023. The OCC also utilized other supporting information while evaluating SB's CRA performance including 2021 through 2023 bank loan data, internal bank records, FDIC market share data, and information from governmental websites regarding the characteristics and economy of the AA. Examiners also considered information from a community contact to help assess the needs of the AA and the opportunities for financial institutions to lend and provide services with that area.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's lending performance in the state of Ohio is reasonable.

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

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

In determining conclusion, examiners gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of non-farm businesses located in low and moderate income CTs within the AA. For example, based on 2023 Dunn & Bradstreet data, 62.6 percent of non-farm businesses in the AA are in middle- and upper-income CTs.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

2021

The percentage of small business loans of 14.0 percent in low-income CTs is near the percentage of business in low-income CTs of 14.3 percent and exceeds the aggregate lending percentage of 12.4 percent. The percentage of small business loans to businesses located in moderate-income CTs at 6.1 percent is below both the 10.6 percent of businesses in moderate-income CTs and the 10.7 percent aggregate lending rate. The bank made no loans in CTs without an assigned income level.

2022-2023

The percentage of small business loans of 10.7 percent exceeds both the 9.1 percentage of small businesses in low-income tracts within the AA and the aggregate lending rate of 6.5 percent in low-income CTs. The percentage of small business loans in moderate-income CTs of 15.5 percent is below the 18.1 percent of businesses in moderate-income tracts and is near the aggregate lending percentage of 16.1 percent. The percentage of loans in CTs without an assigned income level of 8.7 percent is near the 10.2 percent of small businesses without an assigned income level and exceeds the aggregate lending percentage of 6.4 percent.

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

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

#### ***Small Loans to Businesses***

Refer to Table R in the state of Ohio section of *Appendix D* for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

In evaluating the borrower distribution of loans to businesses of different sizes, examiners considered the level of competition and its limiting effect on the bank's ability to lend, as well as the economic conditions in the AA and the number of small businesses within the AA.

2021

The bank's 35.0 percentage of small business loans to businesses with revenue less than or equal to \$1 million for 2021 is significantly less than the 80.8 percent of businesses in the AA that report revenues \$1 million or less. The 35.0 percent of loans to businesses with revenues of \$1 million or less is significantly below the aggregate lending rate of 47.6 percent. However, aggregate lending in the AA is also significantly less than the percentage of small businesses at 80.8 percent.

2022-2023

The bank's percentage of loans to small businesses of 65.6 percent is significantly below the 89.9 percent of small businesses reporting annual revenues of \$1 million or less in the AA. The bank's 30.7 percentage of loans to small businesses with revenue \$1 million or less is significantly below both the 89.9 percent of businesses reporting less than \$1 million in revenue and the aggregate lending rate of 50.0 percent. However, the aggregate lending rate is also significantly below the 89.9 percent of businesses reporting revenues of \$1 million or less.

### Responses to Complaints

The bank was not subject to any complaints related to CRA during the evaluation period.

### COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Ohio is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Toledo AA	52	100.0	\$28,177	100.0

SB originated 52 CD loans totaling \$28.2 million, which benefited the bank's AA. When drawing conclusions, considerations included the level of competition for CD loans within the bank's AA from larger financial institutions and overall economic conditions impacting the bank's ability to generate CD loans. Of the 52 CD loans, 28 represented credit extensions of previously originated loans. Examples of CD loans include the following:

- Four loan originations and extensions totaling \$13.0 million during 2022, and 2023 to an organization that provides residential and support services to individuals with developmental disabilities.

- Three extensions of credit totaling \$3.0 million in 2021 and 2022 to an organization that works to eradicate poverty by connecting individuals to resources that create health and community sustainability.
- Five extensions of credit totaling \$2.3 million during 2021, 2022, and 2023 to a non-profit organization formed to combat homelessness for people with mental illness.
- Four loan originations and extensions totaling \$2.3 million during 2021, 2022, and 2023 to an emergency family and single women’s shelter and housing program providing trauma informed case management, behavioral health, education, and employment services.
- Two loan originations totaling \$2.1 million during 2022 and 2023 to a commercial company for the purpose of renovating a vacant/distressed industrial building incorporating \$2.8 million in energy saving improvements by Ohio Air Quality Development Authority supporting economic growth, creating, and sustaining 200 jobs in the Toledo Community.
- One \$1.5 million Small Business Association (SBA), Paycheck Protection Program (PPP) loan origination in 2023 to a non-profit mental health and substance use disorder treatment provider.

**Number and Amount of Qualified Investments**

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank’s level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Toledo AA	0	0	116	\$1,046	116	100.0	\$1,046	100.0	0	0

\* *Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.*

\*\* *Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution’s financial reporting system.*

SB made 116 qualifying investments and donations totaling \$1,046,000 inside the AA during the review period. The bank continues to maintain five deposit accounts totaling \$375,000 at two local Community Development Financial Institutions (CDFIs) located in moderate-income CTs that provide financial services to low- and moderate-income individuals within the AA. The bank also made 111 donations totaling \$671,473 to 49 local community organizations for CD initiatives including community services for LMI individuals, affordable housing, and neighborhood revitalization.

### **Extent to Which the Bank Provides Community Development**

SB demonstrated an excellent level of responsiveness to community needs in the Toledo AA by participating in a variety of programs and services in both leadership and non-leadership roles. Programs and services benefited LMI individuals and economic development by providing affordable housing, healthcare, education, and other support to the community. SB employees provided general volunteer and specific technical assistance through participation in boards or financial committees. Examples of bank officer and staff participation are detailed below:

- 18 employees served as board members of organizations supporting LMI individuals, 2 of which are focused on providing affordable housing.
- 14 employees volunteer for an organization providing affordable housing to LMI individuals.
- One employee served as treasurer for a health services provider and family counseling & shelter service provider.
- Two employees served in a leadership group for a community health improvement group that works to provide access to healthcare for low-income individuals.

The bank continues to participate in the Federal Home Loan Bank of Cincinnati's Affordable Housing Program and the Carol M. Peterson Housing Fund. The bank disbursed \$249M in funds to support Carol M. Peterson Housing projects, and \$449M in grants to support the Maumee Valley Habitat for Humanity Homeownership program, which provides grants to assist loan and moderate-income borrowers with home purchases.

## 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 metropolitan and nonmetropolitan areas 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>	1/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Small business, CD Loans, Qualified Investments, and CD services	
<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>Ohio</b>		
Toledo AA	Full-Scope	All of Lucas County and a portion of Wood County. Part of the Toledo MSA

## Appendix B: Summary of MMSA and State Ratings

RATINGS – Signature Bank, N.A.			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
<b>Signature Bank, N.A.</b>	<b>Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>
State:			
<b>Ohio</b>	<b>Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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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.

- 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.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Toledo	179	20,771,465	35	8,637	14.3	14.0	12.4	10.6	6.1	10.7	36.5	32.4	34.9	38.7	47.5	42.0	0.0	0.0	0.0	
<b>Total</b>	179	20,771,465	35	<b>8,637</b>	<b>14.3</b>	14.0	<b>12.4</b>	<b>10.6</b>	6.1	<b>10.7</b>	<b>36.5</b>	32.4	<b>34.9</b>	<b>38.7</b>	<b>47.5</b>	<b>42.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Toledo	103	22,249,383	19.2	7,601	9.1	10.7	6.5	18.1	15.5	16.1	25.5	24.3	26.9	37.2	40.8	44.1	10.2	8.7	6.4	
<b>Total</b>	103	22,249,383	19.2	<b>7,601</b>	<b>9.1</b>	10.7	<b>6.5</b>	<b>18.1</b>	15.5	<b>16.1</b>	<b>25.5</b>	24.3	<b>26.9</b>	<b>37.2</b>	<b>40.8</b>	<b>44.1</b>	<b>10.2</b>	8.7	<b>6.4</b>	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Toledo	511	108,662,181	77.5	8,637	80.8	35.0	47.6	6.6	59.5	12.6	5.5
<b>Total</b>	<b>511</b>	<b>108,662,181</b>	<b>77.5</b>	<b>8,637</b>	<b>80.8</b>	35.0	47.6	6.6	59.5	12.6	5.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-2023</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Toledo	336	104,293,014	65.6	7,601	89.9	30.65	50.0	3.1	69.04	7.0	0.30
<b>Total</b>	<b>336</b>	<b>104,293,014</b>	<b>65.6</b>	<b>7,601</b>	<b>89.9</b>	30.65	<b>50.0</b>	<b>3.1</b>	69.04	<b>7.0</b>	0.30

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%