



## **PUBLIC DISCLOSURE**

July 31, 2023

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

The Huntington National Bank  
Charter Number: 7745

17 South High Street  
Columbus, OH 43215

Office of the Comptroller of the Currency

Large Bank Supervision  
Constitution Center  
400 7<sup>th</sup> Street SW  
Washington, DC 20219

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated Outstanding.

The following table indicates the performance level of The Huntington National Bank (HNB, the bank, or the institution) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Huntington National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors supporting this rating include:

- The Lending Test is rated outstanding. The Lending Test rating is based on Outstanding ratings in 10 rating areas, including the two largest rating areas of Michigan and Ohio by deposit volume, which account for 73.7 percent of total deposits. HNB received High Satisfactory ratings in three rating areas and a Low Satisfactory rating in one rating area.
- The Investment Test is rated outstanding. The Investment Test rating is based on Outstanding ratings in 10 rating areas, including Michigan and Ohio. HNB received High Satisfactory ratings in two rating areas and Low Satisfactory ratings in two rating areas.
- The Service Test is rated outstanding. The Service Test rating is based on Outstanding ratings in six rating areas, including Michigan and Ohio. HNB received High Satisfactory ratings in five rating areas, Low Satisfactory ratings in two ratings areas, and a Needs to Improve rating in the smallest rating area.

## Flexible and Innovative Retail Service Products

HNB offers multiple flexible and innovative retail service products aimed at connecting consumers and small businesses to account options and financing needs. Flexible loan products include federal housing flexible term loans, special state bond loan programs, and custom loan programs. HNB also originates and retains loans within its loan portfolio, which are not immediately saleable into the secondary market, due to loan terms.

HNB's Community Access Mortgage (CAM) product helps borrowers with higher loan to values during the refinance or purchase process in low- to moderate-income (LMI) census tracts (CTs). The minimum credit score for a CAM for a single unit principal residence property is 620, and the maximum loan-to-

value (LTV) is 97 percent. These criteria apply to purchase and limited cash-out mortgage refinances. The bank does not require private mortgage insurance on the CAM product, and no upward interest rate adjustments occur for lower credit scores. Another version of the CAM exists and is named the Hometown Mortgage. The product is available in partnership with non-profit organizations and allows for the approval of applicants with credit scores as low as 580 when paired with financial education participation. In addition to the CAM products, HNB has programs where closing costs for homeowners could be waived based on various factors, including homes located in LMI CTs.

Additionally, in the mortgage space, HNB participated in the OCC's Project REACH (Roundtable for Economic Access and Change), and in March 2021 launched a low-down payment, low closing cost pilot program to help LMI home buyers in the cities of Toledo, OH, Columbus, OH, Detroit, MI, and Huntington, WV. In each city, HNB worked with counseling organizations to reach out to prospective minority LMI individuals seeking to acquire homes in LMI neighborhoods. The partner organizations also provided home buyer counseling to the borrowers prior to loan closing. Under the current pilot program, borrowers provide a down payment of as little as five percent, which can include gifts or other forms of down payment assistance. HNB provides an additional down payment assistance loan equal to a maximum of 15 percent of the purchase price. The combination of these two loans reduces the first mortgage LTV ratio to 80 percent, thus avoiding the need for private mortgage insurance. The down payment assistance loan carries a zero percent interest rate, and no monthly payments are required. The down payment assistance loan is repayable when certain events occur, such as home sale or a mortgage refinance. When paired with the bank's closing cost assistance program available to LMI borrowers in LMI CTs, borrowers pay only \$500 in HNB required closing costs. This results in an additional savings of at least \$2,000 in closing costs for borrowers.

Another flexible product in the mortgage space is HNB's Home for Good mortgage. The Home for Good product expands access to homeownership in historically under-resourced communities. It was launched and piloted in January 2023 in the Chicago multi-state metropolitan statistical area (MMSA) and Detroit, Michigan Metropolitan Division (MD). The program aims to lend to borrowers with lower credit scores, high debt-to-income ratios, and in areas with higher area median incomes. HNB evaluates applicants with credit scores between 580 and 620 by considering rental payment history as a compensating factor in loan approval decisioning, including a 24-month history of on-time rental payments. The product also assists borrowers with higher debt to income ratios. HNB underwriting takes into consideration the compensating factors such as two months of monthly payment reserves, and/or an LTV of less than 95 percent as part of the decisioning criteria. HNB also provides closing cost assistance to all recipients of Home for Good mortgages.

HNB offers unsecured home improvement and debt manager products, with no minimum loan amounts paired with below market interest rates, and relaxed credit score criteria. HNB's Debt Manager loan is an unsecured loan designated to help customers establish a plan to payoff existing credit card debt balances. The product has a fixed rate and term, which result in an avoidance of rate increases, while enabling customers to reduce credit card balances. The bank requires the closure of any credit card for which the balance is being paid off with the Debt Manager loan product. The Debt Manager loan product is unsecured and provides a potential solution for customers who do not own a home or do not have sufficient equity available for an equity consolidation loan.

Similarly, the unsecured home improvement loan is designed for customers where gaps currently exist in the market for consumers living in LMI census tracts who are unable to qualify for home equity loans because of decreased home values or blighted conditions. HNB developed the product with significant input from non-profit organizations and community partners throughout the bank's geographic footprint.

For small business lending, HNB launched its Lift Local Business program in October 2020. The program is part of HNB's Strategic Community Plan, which focuses on lending to minority-owned businesses and businesses operating in majority minority communities. The program is offered in all states where HNB operates and supports businesses throughout their lifecycle from start-up, to expansion, to maturity. The program provides Small Business Administration (SBA) guaranteed loans ranging from \$1,000 to \$150,000, and HNB pays the SBA fees. These loans have no origination fees, lower credit score requirements, and flexible longer-term repayment options of up to 10 years. In partnership with Operation HOPE, HNB developed an online learning management system with which small business owners can produce business plans with projections and a proforma balance sheet at no cost. Small business owners with a Lift Local Business loan also have access to HNB checking accounts with 24-Hour Grace. The 24-Hour Grace feature on HNB checking accounts provides individuals more time to deposit funds into an account to avoid being charged overdraft fees. The feature also allows individuals to take action to get pending return transactions paid and avoid potential fees incurred from merchants. Visual prompts in HNB's mobile application highlight the availability of 24-Hour Grace. Negative account balances turn red, and a 24-Hour Grace icon appears in the application under the negative account balance. Overdraft and monthly service fees are waived for 36 months.

## Lending in Assessment Area

A substantial majority of the bank's loans are located in its Assessment Areas (AAs).

The bank originated and purchased 93.5 percent of its total loans, by number, 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. This performance factored positively into the overall analysis of the geographic distribution of lending by the income level of the geographies.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	239,736	93.7	16,248	6.3	255,984	48,361,448	92.3	4,037,161	7.7	52,398,609
Small Business	113,055	93.3	8,129	6.7	121,184	10,644,955	93.4	758,258	6.6	11,403,213
Small Farm	2,812	88.8	354	11.2	3166	185,094	88.8	23,357	11.2	208,451
Total	355,603	93.5	24,731	6.5	380,334	59,191,497	92.5	4,818,776	7.5	64,010,273

## Description of Institution

HNB is an interstate bank headquartered in Columbus, OH. The bank is a wholly owned subsidiary of Huntington Bancshares Incorporated (HBI). HBI is a highly diversified financial services provider with \$182.9 billion in assets as of December 31, 2022. Refer to appendix A for a complete list of subsidiaries and affiliates.

On December 13, 2020, HBI announced the signing of a definitive agreement with TCF Financial Corporation under which the companies would combine in an all-stock merger. TCF Financial Corporation, a financial holding company headquartered in Detroit, Michigan, was the parent company of TCF National Bank. On June 9, 2021, HNB acquired TCF with its bank branch network. This acquisition expanded HNB's already-growing diversified geographic presence across the midwestern region of the United States, and into the states of Colorado, Minnesota, South Dakota, and Wisconsin. Legacy HNB and TCF CRA AAs also overlapped in some AAs. These included AAs in Ohio, Michigan, and Illinois. The OCC only considered loans made by HNB in these AAs as part of this evaluation.

As of December 31, 2022, HNB had total assets of \$182.3 billion, total deposits of \$142.1 billion, and a tier 1 capital base of \$15.3 billion. All of HNB's deposits were held in domestic U.S. offices. Loans and leases totaled \$120.7 billion, as of December 31, 2022, and represented 66.2 percent of total assets.

The bank's primary business strategy is to offer products and services for a range of customers including individuals, small businesses, and corporations. HNB has businesses engaged in retail banking, residential mortgage banking, SBA lending, small business lending, middle market banking, government banking, asset finance, and commercial real estate. The bank offers these products and services under the Consumer and Regional Banking, Commercial Banking, and Treasury/Other business segments. The Consumer and Regional Banking segment provides various products and services to consumer and business customers including, but not limited to, deposits, lending, payments, mortgage banking, dealer financing, investment management, trust, and brokerage insurance. The Commercial Banking segment targets clients across a national footprint and includes customers in middle market banking, corporate banking, specialty banking, government banking, asset finance, commercial real estate, and capital markets. The Treasury/Other function includes technology, operations, and any other clients, which do not fit under other segments. HNB's business model emphasizes the delivery of a set of banking products and services offered by larger competitors but distinguished by local delivery and customer service.

As of December 31, 2022, HNB was a full-service bank operating 1,077 full-service, grocery, and drive-thru branches and private client group offices. These branches were in Colorado, Illinois, Indiana, Kentucky, Michigan, Minnesota, Ohio, Pennsylvania, West Virginia, and Wisconsin. Select financial services and other activities are also conducted in other states, including a Private Client Banking Office established in Naples, Florida.

HNB had 14 rating areas consisting of 53 AAs in 10 states and four MMSAs. The states included Colorado, Florida, Indiana, Michigan, Minnesota, Ohio, Pennsylvania, South Dakota, West Virginia, and Wisconsin. MMSAs included Chicago-Naperville-Elgin, IL-IN-WI, Cincinnati OH-KY-IN, Weirton-Steubenville OH-WV, and Youngstown-Warren-Boardman, OH-PA.

No known legal, financial, or other factors existed which impeded HNB's ability to help meet the credit needs within its AAs during the evaluation period. The bank had no affiliates or subsidiaries that negatively affected the bank's capacity to lend.

HNB received an overall outstanding rating in its last CRA evaluation by the OCC, dated May 5, 2020.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This performance evaluation assesses the bank's CRA performance under the large institution Lending, Investment, and Service Tests. The evaluation period is January 1, 2020, through December 31, 2022. In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms reported under the CRA, and community development (CD) loans. Also evaluated were retail services, qualified investments, and CD services from January 1, 2020, through December 31, 2022. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the US were considered in this evaluation. Consumer loans were not considered in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business.

Due to updated 2020 census data, census tract income level designation changes became effective January 1, 2022. Examiners analyzed loan data against the applicable demographic data for each period, resulting in multiple analyses and sets of tables. Examiners analyzed home mortgage loans, small loans to businesses, and small loans to farms for the 2020-2021 analysis period, using 2015 American Community Survey (ACS) demographic information and for the 2022 analysis period, using 2020 Census demographic information. Unless otherwise noted in a specific AA, examiners placed more weight on the 2020-2021 analysis period as it covered more of the overall evaluation period and more total lending, based on both loan count and dollar volume. Examiners included narrative discussions and data in the tables in appendix D for both analysis periods. Each full-scope AA contains demographic tables presenting the 2015 ACS data and the 2020 census data. The data for both periods are presented separately in the same set of tables. Refer to appendix D of this Performance Evaluation (PE) for the tables.

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

In each state where the bank had its main office, branches, and deposit-taking ATMs, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA) or MMSA 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 section 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.

For AAs comprised of two or more MDs within the same MSA or MMSA, data aggregation occurred prior to analyzing the bank's performance with conclusions presented on the bank's performance at the MSA/MMSA level.

## Ratings

The bank's overall rating is a blend of the state ratings and multistate ratings. The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings. The states of Ohio and Michigan and the Chicago-Naperville-Elgin, IL-IN-WI MMSA represent the bank's most significant markets in terms of lending, deposits, and branch distribution. These two states and one MMSA carry the greatest weight in the overall conclusions. The state of Ohio accounted for 39 percent of the bank's home mortgage loans, 35.1 percent of small business loans, 48.1 percent of total deposits, and 28.2 percent of the branch network. The state of Michigan accounted for 18.6 percent of the bank's home mortgage loans, 21.4 percent of small business loans, 25.6 percent of total deposits, and 30.1 percent of the branch network. The Chicago-Naperville-Elgin, IL-IN-WI MMSA accounted for 10.7 percent of the bank's home mortgage loans, 4.3 percent of small business loans, 6.1 percent of total deposits, and 13.2 percent of the branch network.

## Description of Factors Considered Under Each Performance Test

### Lending Test

#### *Loan Products Evaluated*

The OCC evaluated home mortgage loans, small loans to businesses, and small loans to farms in each AA. All home mortgage products were reviewed, and conclusions were reached in the aggregate. Small farm lending is not a major product in any of the bank's AAs, and the volume of small farm lending was minimal for most of the rated areas.

When differences in performance existed between loan products, the OCC emphasized the products based on the loan mix by number of loans specific to the AA over the evaluation period in determining an overall conclusion. The weightings are described within the narrative comments of each rating area. Weighting by number of loans gives consideration for each lending decision regardless of a loan's dollar amount.

The OCC did not perform a statistical analysis or draw conclusions for a loan product if the bank originated or purchased fewer than 20 loans in an AA. The bank has several AAs with an insufficient number of home mortgage loans or small loans to farms for a meaningful analysis. These AAs are identified in the Scope of Evaluation section of each state or MMSA.

#### *Lending Activity*

Examiners assessed lending activity responsiveness by comparing the bank's deposit market rank percentage in each AA to the market rank percentage for each applicable lending product (home mortgage, small business, or small farm). Specifically, the bank's market rank (deposit or lending) was divided by the total number of depository institutions or lenders, respectively, to determine the bank's "percentile." This approach takes into consideration differences between the number of insured depository institutions and number of home mortgage, small business, and small farm lenders within the AA.



### *Loan Distribution Analysis*

The loan distribution analyses compared home mortgage loans, small loans to businesses, and small loans to farms to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrates how the bank performs relative to other lenders in the AA and provides context on the reasonableness of the bank's performance. The aggregate data for home mortgage loans, small loans to businesses, and small loans to farms is from 2021 for the analysis period of 2020 through 2021 based on the 2015 ACS. Aggregate data is from 2022 for the analysis period of 2022 based on the 2020 Census for the home mortgage lending analysis. The OCC did not utilize small business or small farm loan aggregate data from 2022 as it was not available when this evaluation was performed.

### *Geographic and Borrower Distribution*

The OCC gave equal weighting to geographic and borrower distribution components of the Lending Test. The OCC placed more emphasis on the comparison to geographic and borrower distributions than on aggregate performance, unless other performance context factors indicated greater consideration should be given to aggregate performance. Due to completion of the 2020 Census, the analysis period was also divided into two timeframes, ensuring utilization of the most up to date information to analyze the bank's performance in 2022. Geographic and borrower comparators covered all three years of the evaluation period but under two different analysis periods. One period covered the years of 2020 to 2021 and another for 2022, as a stand-alone year. Aggregate comparators included data from 2021 for comparison to the period of 2020 to 2021. For the standalone analysis period of 2022, aggregate comparators included data from 2022 but only for the home mortgage lending analysis as small business and small farm aggregate data was unavailable at the time of the review.

For the analysis of distribution of loans to geographies with different income levels, performance between low-income and moderate-income categories was weighted equally unless otherwise noted. If emphasis was needed to reach an overall performance conclusion, the category with more lending opportunities (e.g., more businesses, owner-occupied housing units, or families) was weighted more heavily. For the home mortgage borrower distribution analysis, consideration was given to the impact income, poverty levels, and housing costs have on limiting homeownership opportunities for LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher-cost areas when comparing the distribution of home mortgage loans to the demographics. In these higher-cost markets, it may be difficult for many LMI borrowers to afford a home since the area's median housing value is typically too high for conventional mortgage loan qualifications. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data. The competitors included in aggregate data are subject to the same factors as Huntington, including income, poverty levels, and elevated housing costs.

For each full-scope AA, examiners analyzed the affordability of home mortgages for low- and moderate-income borrowers. This analysis used the median home price per U.S. Census data reported in each Table A. Examiners further considered the significant price increases across the country as a result of increased demand due to the COVID-19 pandemic and reduced borrowing costs from historically low mortgage interest rates through 2020 and into 2022. Examiners compared changes to the Federal Housing Finance Agency (FHFA) Housing Price Index (HPI) between the first quarter of 2020 to the fourth quarter of 2022 to assess the impact on housing affordability in each MSA or MD. FHFA HPI values reference a base year allowing for an estimate of the increase in relative home prices for each MSA or MD.

### *Community Development Loans*

The analysis considered the number and dollar volume of CD loans with emphasis placed on those loans particularly innovative, complex, or responsive to the needs of the AA. To provide perspective on the relative level of CD lending, the bank's tier 1 capital was allocated to each rating area and AA based upon the relative percentage of total deposits in each rating and AA.

### *Other Loan Data*

The OCC also considered, at the bank's option, commercial leases and letters of credit that provided a CD purpose.

### **Investment Test**

The OCC's analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as the primary purpose. Qualified investments included investments meeting the definition of CD, which the bank made during the current evaluation period and investments made prior to the current evaluation period that remained outstanding. The OCC considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. Evaluation of the bank's performance considers the number and amount of investments and extent the investments meet the credit and CD needs of an AA.

HNB received consideration for any investment activity that benefited a specific AA in the applicable MMSA or state rating area. This included investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Broader statewide or regional activities that did not serve an AA were considered only if the bank had reasonably served the needs of its AAs. Because HNB was responsive to the CD needs of its AAs, the OCC provided consideration for qualified investments in entities or activities in the broader statewide, regional, or nationwide area surrounding the bank's AAs whose activities neither serve nor benefit the AAs.

The OCC compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the tier 1 capital allocated to the AAs to gain a perspective regarding the volume of investment activity. Tier 1 capital was allocated to the rating areas and AAs based upon the relative percentage of total deposits in each rating and AA.

### **Service Test**

The OCC's review of services during the evaluation period included analyzing HNB's network of retail branches and deposit-taking ATMs for the availability and effectiveness of delivering retail-banking services. The most weight was given to the geographic distribution of bank branches and changes in branch locations.

### *Retail Branches*

Examiners gave primary consideration to HNB's performance in delivering retail products and services to geographies and individuals of different income levels through the distribution of branches. Examiners focused on branches in low- and moderate-income geographies. In instances where there

were few branches in a full-scope AA, examiners considered additional performance context, including the presence of ATMs, hours of operation at the branches, and geographic distribution of lending to arrive at conclusions.

### *Branch Proximity*

In the full-scope AAs, examiners reviewed branch locations in middle- and upper-income (MUI) geographies that served and improved accessibility for customers in low- and moderate-income geographies in one of two ways. Examiners gave positive consideration when a MUI branch was “across the street” (less than 1,000 feet) from a low- or moderate-income geography. Examiners also considered MUI branches for which the bank supplied data that demonstrated the branch services customers located in LMI geographies. Examiners assessed the level of usage by unique customers from MUI geographies and from LMI geographies. A branch was considered to serve residents of LMI geographies and received positive consideration if the percentage of usage by LMI customers exceeded the percentage of the population living in LMI geographies within that AA. Branches that met both tests were only considered once.

### *Alternative Delivery Systems*

HNB offered other alternative delivery systems (ADS) including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options that increased accessibility for both retail and business customers. In each full-scope AA, examiners positively considered ADS usage where bank data demonstrated that systems usage, including online banking or the mobile app, by customers located in LMI geographies was high (over 80 percent) as of the fourth quarter of 2022 and/or had significantly increased (25 percent or more) over the evaluation period.

### *Branch Hours and Retail Products and Services*

The OCC evaluated the range of services and products offered by all the bank’s branches. Examiners specifically focused on any differences in branch hours, products, and services provided in LMI geographies compared to those provided in MUI geographies. Branch hours and retail products and services offered at branches are relatively consistent throughout the bank’s AAs.

### *Branch Openings and Closings*

Over the evaluation period, HNB opened and closed branches with the intention of optimization of the retail branch network. The primary driver of branch openings and closings throughout the bank’s service area included instances where branches overlapped or there was redundancy. The acquisition of TCF National Bank impacted some markets, resulting in redundancy throughout the footprint. The bank considered factors including branch redundancy or proximity to other HNB locations or ATMs; customer behaviors in the market, including transaction migration to HNB’s growing digital capabilities; and its geographic footprint in its decision-making process. Formal processes dictated branch opening and closing decisions, which included reviews by several departments of the bank. Management also solicited feedback from the affected communities. The bank established a process to assess and mitigate any negative effects of branch closures to low- and moderate-income customers and communities. The OCC considered this when determining the effect of branch openings and closings in the bank’s market areas.

In AAs where the bank closed branches, particularly in LMI geographies, the OCC evaluated the following:

- The impact of the branch closure on the overall geographic distribution of branches within the AA relative to the percentage of the population;
- The bank's rationale or justification for the branch closure;
- Customer complaints and comment letters resulting from, or related to, the branch closure;
- The availability of ADS to provide access to retail banking services; and
- Bank-provided information related to customer use of the branch.

The OCC did not assess this performance criteria for the Service Test evaluation in AAs where the bank had no branch openings or closings during the evaluation period.

### *Community Development Services*

The bank's record of providing CD services was evaluated in the AAs that received full-scope reviews. Primary consideration was the responsiveness to the needs of the community. Services that addressed critical needs, were most impactful, or reflected ongoing relationships with organizations involved in CD services, received the most consideration in this analysis.

## **Other Information**

### **Assessment Areas**

The OCC determined all AAs consisted of whole geographies and met the requirements of 12 CFR 25.41. The areas reasonably reflected the different trade areas that HNB's branches service and did not arbitrarily exclude any low- and moderate-income areas.

### **Lending Gap Analysis**

The OCC reviewed summary reports and maps and analyzed home mortgage, small business, and small farm lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained, conspicuous gaps in any of the full-scope areas reviewed.

### **Deposit Market Share**

The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2022, unless otherwise noted. This was the most recent public data available during the evaluation period.

### **Community Contacts**

The OCC reviewed and considered community contacts available from the OCC, FDIC, and Federal Reserve Banks that occurred during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs. Community contacts were utilized to ascertain the AA's credit needs, demographics, and economic conditions. During the evaluation, applicable community contacts are referenced in each AA that received a full-scope review. The community contacts indicated that affordable housing, small business financing, and financial education

continued to be the primary credit and community development needs in many AAs. Numerous contacts identified HNB as being an important partner in their communities. These details are outlined as applicable throughout the evaluation. Contacts volunteered this information without knowledge this evaluation was occurring, and contacts were not directly asked about HNB's involvement with their organizations.

### **Coronavirus Disease 2019 (COVID-19)**

In March 2020, the United States faced the pandemic from the COVID-19 virus, which resulted in massive economic issues, including business shutdowns and increased unemployment. The government instituted several programs and initiatives to assist businesses and individuals, including the Payroll Protection Program (PPP), mortgage foreclosure and eviction protection programs, and extended unemployment benefits, to name a few. The OCC considered the bank's participation in addressing community and customer needs during the COVID-19 pandemic for all AAs in the Lending, Investment, and Service Tests of this evaluation.

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

Pursuant to 12 C.F.R. § 25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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.

## Multistate Metropolitan Statistical Area Ratings

### Chicago-Naperville-Elgin, IL-IN-WI MMSA

**CRA rating for the Chicago MMSA<sup>1</sup>:** Outstanding

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

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was adequate.
- The bank is a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA, and the bank provided a relatively high level of CD services.

### Description of Institution's Operations in Chicago MMSA

HNB delineated three MDs in the Chicago area as part of the AA. These included counties in the Chicago-Naperville-Evanston, IL MD, the Elgin, IL MD, and the Lake County-Kenosha County, IL-WI MD. The OCC combined the counties composing the three MDs and formed the Chicago MMSA AA for analysis purposes. The Chicago MMSA was HNB's third largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$9.1 billion in deposits in the Chicago MMSA, representing 6.1 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 142 branches and 208 ATMs, of which 202 were deposit taking, representing 13.2 percent of total branches and 10.6 percent of total ATMs. The bank originated and purchased approximately \$10.8 billion in home mortgage and small business loans within the Chicago MMSA, representing 16.3 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 147 FDIC-insured institutions operated 2,096 branches in the AA. HNB ranked 12<sup>th</sup> in deposit market share, with 1.6 percent. The top three banks by deposit market share were JPMorgan Chase Bank, National Association with 23.4 percent, BMO Bank, National Association with 14.7 percent, and Bank of America, National Association with 10.5 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

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<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following tables provide a summary of the demographic data, including housing, business, and economic information, for the Chicago-Naperville-Elgin, IL-IN-WI MMSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,052	14.0	24.0	29.2	31.8	0.9
Population by Geography	8,828,337	10.0	23.8	31.9	34.0	0.3
Housing Units by Geography	3,505,880	10.3	22.8	31.9	34.7	0.3
Owner-Occupied Units by Geography	2,042,238	4.5	18.0	35.7	41.7	0.1
Occupied Rental Units by Geography	1,143,447	17.5	29.8	26.7	25.3	0.7
Vacant Units by Geography	320,195	21.9	27.8	26.0	23.9	0.5
Businesses by Geography	768,237	6.1	16.9	28.9	47.5	0.5
Farms by Geography	12,136	3.7	15.8	40.7	39.6	0.1
Family Distribution by Income Level	2,093,795	23.5	16.4	18.7	41.5	0.0
Household Distribution by Income Level	3,185,685	25.4	15.3	17.1	42.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$244,547
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,050
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Families Below Poverty Level			10.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chicago MMSA</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)	2,138	11.7	23.2	31.9	31.9	1.3
Population by Geography	8,847,306	9.0	22.8	34.1	33.5	0.6
Housing Units by Geography	3,532,216	9.3	22.3	33.9	33.9	0.6
Owner-Occupied Units by Geography	2,089,508	4.5	18.6	37.2	39.4	0.3
Occupied Rental Units by Geography	1,167,082	15.5	28.2	29.7	25.6	1.0
Vacant Units by Geography	275,626	19.4	25.2	27.2	27.1	1.0
Businesses by Geography	984,270	5.9	17.2	31.6	44.8	0.6
Farms by Geography	14,051	4.3	18.5	39.4	37.6	0.3
Family Distribution by Income Level	2,094,194	23.0	16.7	19.3	40.9	0.0
Household Distribution by Income Level	3,256,590	25.4	15.4	17.0	42.3	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$281,977



Median Family Income MSA - 20994 Elgin, IL	\$97,326	Median Gross Rent	\$1,234
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI	\$105,876	Families Below Poverty Level	8.0%
<i>Source: 2020 U.S. Census and 2022 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>			

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the three MDs comprising the Chicago MMSA were \$75,024 to \$87,137. Based on this information, low-income families earned less than \$37,512 to \$43,569 and moderate-income families earned less than \$60,019 to \$69,710. The median housing value in the AA is \$244,547. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$938 to \$1,089 for a low-income borrower and \$1,500 to \$1,743 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,313. Low-income borrowers would be challenged to afford a mortgage loan in the Chicago MMSA, while housing is generally affordable for moderate-income borrowers in the Chicago MMSA. Based on 2020 census data, housing affordability challenges persisted for low-income borrowers while housing became less affordable for moderate-income borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the Federal Housing Finance Agency (FHFA), in the first quarter of 2020, the HPI index was 187.9 and by the fourth quarter of 2022 had increased to 232.9, representing a 23.9 percent increase in MMSA home prices across the evaluation period. This acceleration in home prices worsens existing affordability concerns in the MMSA for LMI borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Chicago MMSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 10.4 percent.

### Economic Data

According to Moody's Analytics, dated August 2022, professional and business services, manufacturing, and hospitality contributed to job growth and are important economic drivers of the economy. Economic and employment growth exceeded the nation's averages. Professional jobs are expected to increase with a well-educated labor force and several companies expanding their downtown footprint. Job growth in goods and production as well as leisure and hospitality have contributed to employment growth. At the same time, residential construction has slowed, and people are migrating to other areas of the country. The largest employers are Advocate Health Care System, Northwestern Memorial Healthcare, the University of Chicago, and Amita Health.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Chicago-Naperville-Elgin, IL-IN-WI MMSA was 4 percent as of January 2020. In April 2020, unemployment levels peaked at 18.4 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Chicago-Naperville-Elgin, IL-IN-WI MMSA was 4.1 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC completed one community contact, and reviewed information from six additional community contacts completed during the evaluation period within the Chicago MMSA to better understand area credit and community needs. Contacts worked for organizations focused on affordable housing in the Chicago MSA. The contacts cited the following needs:

- Appraisal gap issues, particularly in LMI neighborhoods
- Tailoring loans to match the needs of the community
- Volunteers to participate as faculty in homebuyer counseling programs
- Donations for homebuyer counseling programs, building homes, and general operations
- Serving on boards and committees
- Developing programs and products for the underserved population
- Credit needs and CD opportunities for home, auto, and consumer loans, credit building activities, affordable housing, and small business planning assistance
- Banker participation on CD financial institution (CDFI) and neighborhood community development corporation (CDC) boards and committees
- Financial education for consumers and for business owners

### **Scope of Evaluation in the Chicago MMSA**

The Chicago MMSA received a full-scope review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO MMSA**

### **LENDING TEST**

The bank's performance under the Lending Test in the Chicago MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Chicago MMSA was good.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market share ranks as compared to their deposit market share rank.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
<b>Full-Scope</b>					
Chicago MMSA	27,328	5,752	54	128	33,262
<b>Total</b>	27,328	5,752	54	128	33,262

<b>Dollar Volume of Loans (\$000s)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
<b>Full-Scope</b>					
Chicago MMSA	9,765,452	710,274	5,227	361,219	10,842,172
<b>Total</b>	9,765,452	710,274	5,227	361,219	10,842,172

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 1.6 percent. The bank ranked 12<sup>th</sup> among 147 depository financial institutions placing it in the top nine percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 2.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 11<sup>th</sup> among 1,044 home mortgage lenders in the AA, which placed it in the top two percent of lenders. The top three lenders with a combined market share of 18.2 percent were JPMorgan Chase Bank, National Association with 7.3 percent, Guaranteed Rate, Inc. with 6.8 percent, and Rocket Mortgage with 4.1 percent.

According to peer small business data for 2021, the bank had a market share of 0.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked 20<sup>th</sup> among 342 small business lenders in the AA, which placed it in the top six percent of lenders. The top three lenders with a combined market share of 44.1 percent were JPMorgan Chase Bank, National Association with 20.6 percent, American Express National Bank. with 13.9 percent, and Cross River with 9.6 percent.

According to peer small farm data for 2021, the bank had a market share of 0.6 percent based on the number of small loans to farms originated or purchased. The bank ranked 18<sup>th</sup> among 43 small farm lenders in the AA, which placed it in the top 45 percent of lenders. The top three lenders with a combined market share of 44.6 percent were JPMorgan Chase Bank, National Association. with 25.8 percent, John Deere Financial FSB with 10.1 percent, and US Bank, National Association. with 8.7 percent.

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

The bank exhibited an adequate geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the Chicago MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

*2020-2021*

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in those geographies and near to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and near to the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distributions of lending in both low- and moderate-income geographies.

***Small Loans to Businesses***

Refer to Table Q in the Chicago 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

*2020-2021*

The bank's percentage of small business loans in low-income geographies was significantly below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies was near to the percentage of businesses in those geographies and was below the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distributions of lending in both low-income and moderate-income geographies.

***Small Loans to Farms***

Refer to Table S in the Chicago MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small farm loans was good.

*2020-2021*

The bank's percentage of small farm loans in low-income geographies was below the percentage of the percent of farms in those geographies but exceeded the aggregate distribution of loans. The percentage of small farm loans in moderate-income geographies exceeded both the percentage of farms population in those geographies and the aggregate distribution of loans.

2022

The bank did not make a sufficient number of loans in the 2022 period to conduct a meaningful analysis.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

2020-2021

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of loans.

2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of loans to low-income borrowers.

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

Refer to Table R in the Chicago MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

2020-2021

The bank did not collect or consider the gross annual revenues in the underwriting of 7.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses

with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### ***Small Loans to Farms***

Refer to Table T in the Chicago MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small farm loans was good.

2020-2021

The bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of small farms in the AA less but exceeded the aggregate distribution of all reporting lenders.

2022

The bank did not make a sufficient number of loans in the 2022 period to conduct a meaningful analysis.

### **Community Development Lending**

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 128 CD loans totaling \$361 million, which represented 38.4 percent of the allocated tier 1 capital. CD loans primarily supported economic development and revitalization and stabilization efforts. By dollar volume, 25.3 percent of these loans funded affordable housing, 31.8 percent funded economic development, 32.5 percent funded revitalization and stabilization efforts, and 10.4 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$35.1 million dollar construction loan for rehabilitation of three existing vacant buildings in an Opportunity Zone and the city of Chicago's Invest South/West community improvement initiative. The buildings are in a low-income census tract and surrounded by other LMI tracts. The buildings will be converted into industrial/office space. The purpose of the project is to attract new businesses and create jobs. This loan is responsive to the needs for revitalization and stabilization.

- HNB made an \$18 million loan to a non-profit partner to finance the acquisition and rehabilitation of a 100-unit affordable low-income housing tax credit (LIHTC) housing development. The property will provide subsidized Section 8 housing for seniors with incomes at 50 percent of the area median income or less. The project received additional financing from the Illinois Housing Development Authority in the form of a bond issue and permanent financing through HOME funds. Kane County, Illinois provided subordinate financing, and the nonprofit housing organization provided \$4 million in seller financing. This loan is responsive to the identified need of affordable housing. The loan is also complex due to the financing structure and partnership with other organizations.
- The bank originated a \$16.2 million dollar loan to finance the development of a 50-unit, LIHTC affordable housing development. The building will include 42 energy efficient units that are affordable to households earning 60 percent or below the area median income. The remaining eight units will be reserved to accommodate workforce level rates for households at or below 80 percent of the area median income. This loan is responsive to the identified need of affordable housing.

### Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 1,603 loans under its flexible lending programs totaling \$250.8 million. Refer to the comments in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

Flexible Lending Product	# of Loans	Dollar Amount (000s)
Conventional Flexible - All Products	1,146	\$232,189
Debt Manager	215	\$3,794
Port - 30 Year Fixed - CAM CRA	32	\$4,831
Port - 30 Year Fixed - Hometown Mortgage	3	\$542
Unsecured HI	132	\$2,813
Lift Local	75	\$6,625
<b>Total</b>	<b>1,603</b>	<b>\$250,794</b>

### INVESTMENT TEST

The institution's performance under the Investment Test in the Chicago-Naperville-Elgin, IL-IN-WI MSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago-Naperville-Elgin, IL-IN-WI MSA is excellent.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Chicago MSA	9	\$10,643	225	\$101,657	234	100.0	\$112,300	100.0	10	\$6,336
<b>Total</b>	9	\$10,643	225	\$101,657	234	100.0	\$112,300	100.0	10	\$6,336

\* 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.

The bank made 225 investments totaling \$101.7 million during the evaluation period, which includes 198 qualifying donations totaling \$1.9 million to approximately 72 organizations. The dollar volume of current- and prior- period investments represented 12 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.7 percent of investments supported affordable housing and 0.3 percent supported economic development. The institution occasionally uses innovative or complex investments to support CD initiatives. The bank made nine LIHTC fund investments totaling \$82.2 million.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$14.7 million to provide LIHTC equity via a proprietary investment for a 53-unit apartment building targeting tenants earning up to 30 percent, 50 percent, 60 percent, and 80 percent of the area median income. Additionally, HNB purchased an \$11.9 million participation in a \$16.9 million construction loan agent by another bank for the project.
- The bank made a \$5 million investment commitment for five years to purchase individual securities issued by a certified CDFI serving as a mortgage lender that provides financing to buy and rehabilitate multifamily apartment buildings with five or more units.
- HNB made \$120,000 in donations to support a financial empowerment center (FEC), which opened in early 2020 and located in a moderate-income census tract. The FEC's goal is to improve the financial stability and awareness of LMI households by providing free, professional, one-on-one financial counseling through a contractual relationship with a local nonprofit provider.

## SERVICE TEST

The bank's performance under the Service Test in the Chicago MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago MMSA was excellent.

## Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.



Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full-Scope													
Chicago MMSA	100	142	100	4.9	20.4	39.4	34.5	0.7	9.0	22.8	34.1	33.5	9.0

Totals may not equal 100 percent due to rounding.

The NA category consists of geographies that have not been assigned an income classification.

HNB's distribution of branches in low-income geographies was below, and in moderate-income geographies was near to, the percentage of the population living within those geographies. The OCC gave positive consideration for 35 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, 21 were located within 1,000 feet of an LMI geography and the remaining 14 serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this PE. This had a positive impact on the service delivery system conclusion.

HNB had several ADS, including ATMs, telephone banking, online banking (OLB), and mobile banking options. These systems provided additional delivery availability and access to banking services for both retail and business customers. HNB had 208 ATMs in the AA, 202 of which were deposit-taking. HNB provided data that indicated 76.6 percent of customers in LMI geographies accessed the bank's OLB or mobile application during the fourth quarter of 2022. This was an increase of 36.5 percent for customers in LMI geographies since the first quarter of 2020.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full-Scope							
Chicago MMSA	0	5	-1	0	-1	-3	0

The NA category consists of geographies that have not been assigned an income classification.

The institution's opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. During the evaluation period, the bank closed five branches, one of which was in a low-income geography. The branch closures were a result of branch consolidation related to the TCF merger.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies or individuals.

The bank operated 142 branches in the Chicago MMSA. These included 72 traditional, full-service branches and 70 in-store branches. All but one of the traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday with 45 of the traditional branches, including 28 in LMI geographies, maintaining Saturday hours from 9:00 a.m. to 12:00 p.m. Additionally, 60 of the traditional branches, including 21 branches in LMI geographies, offered drive-through banking with the same hours, of which 40 operated on Saturdays. One branch in an upper-income geography operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, 9:00 a.m. to 5:00 p.m. on Friday, and 9:00 a.m. to 12:00 p.m. on Saturdays. This branch also operated a drive-thru with the same hours, except it was closed on Tuesdays.

Of the 70 in-store branches, 68 operated from 10:00 a.m. to 6:00 p.m., Monday through Friday and 10:00 a.m. to 3:00 p.m. on Saturdays. Two of these branches, one of which was located in a moderate-income geography, operated from 10:00 a.m. to 2:00 p.m. Monday through Friday.

## **Community Development Services**

The institution provides a relatively high level of CD services.

HNB employees provided 1,104 qualified CD service activities to 79 organizations with 3,134 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 128 of the activities with 18 bank employees providing 527 service hours to 21 organizations. The bank's CD services primarily focused on community services targeted to LMI individuals, which represented 1,004 service activities and 2,849 service hours.

Service activity examples during the evaluation period include:

- Four HNB employees volunteered with a local HUD-approved counseling agency that provides LMI individuals with housing counseling assistance. The organization focuses on financial empowerment and affordable housing within Chicago. The agency provides delinquency, default resolution, rental, and pre-purchase counseling while also providing educational workshops that include budgeting, homebuyer education and foreclosure prevention. The HNB employees provided 56 hours of first-time homebuyer education and credit counseling.
- HNB employees participated in virtual financial readiness and literacy programing in partnership with multiple Chicago schools that primarily serve LMI students. In total, 99 employees, including multiple senior vice presidents, provided 414 hours of financial empowerment to approximately 1,000 LMI youth. The programs were offered virtually in response to the COVID-19 pandemic and educated students on various topics, including work readiness, entrepreneurship, financial literacy, business, and microeconomics, through a hands-on, experiential learning process.

- Eleven HNB employees partnered with a local business development organization. These employees participated on a panel that provided business owners with information on capital resources, loan information, elevator pitches, and networking. The organization primarily targets women-owned small businesses but serves all diverse business owners to support and accelerate business development and growth. The HNB employees provided 59 total hours of education and expertise.

## Cincinnati, OH-KY-IN MMSA

**CRA rating for the Cincinnati MMSA<sup>2</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good and borrower distribution of lending was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems are accessible to geographies and individuals of different income levels, and the institution is a leader in providing CD services.

## Description of Institution's Operations in the Cincinnati-OH-KY-IN MMSA

HNB delineated six counties within the Cincinnati MMSA including Butler, Clermont, Hamilton, and Warren Counties in Ohio and Boone and Kenton Counties in Kentucky as the AA. The Cincinnati OH-KY-IN MMSA was HNB's seventh largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$4.6 billion in deposits in the Cincinnati OH-KY-IN MMSA representing 3.1 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 36 branches and 42 ATMs, of which 39 were deposit-taking, within the rating area, representing 3.3 percent of total bank branches and 3 percent of total ATMs. The bank originated and purchased approximately \$3.9 billion in home mortgage and small business loans within the Cincinnati OH-KY-IN MMSA, representing 6.5 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 51 FDIC-insured institutions operated 544 branches in the AA. HNB ranked fourth in deposit market share with 2.8 percent. The top three banks by deposit market share are US Bank, National Association with 52.9 percent, Fifth Third Bank, National Association with 25.9 percent, and PNC Bank, National Association with 5.2 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

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<sup>2</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following tables provide a summary of the demographic data, including housing, business, and economic information, for the Cincinnati OH-KY-IN MMSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	438	13.7	21.7	35.2	27.4	2.1
Population by Geography	1,884,557	8.8	18.3	37.5	34.0	1.4
Housing Units by Geography	807,567	10.9	19.8	37.8	30.9	0.6
Owner-Occupied Units by Geography	476,045	4.3	14.9	40.8	40.0	0.1
Occupied Rental Units by Geography	250,418	19.2	27.7	33.9	18.0	1.2
Vacant Units by Geography	81,104	24.5	24.3	32.3	17.6	1.4
Businesses by Geography	138,282	7.2	18.2	34.0	39.5	1.1
Farms by Geography	3,853	3.9	13.3	46.4	36.2	0.2
Family Distribution by Income Level	473,444	21.9	16.3	19.8	42.0	0.0
Household Distribution by Income Level	726,463	25.2	15.2	16.9	42.7	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$159,392
			Median Gross Rent			\$769
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati MMSA</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)	478	9.8	23.2	34.5	29.1	3.3
Population by Geography	1,976,966	7.2	21.6	36.1	33.5	1.6
Housing Units by Geography	824,473	8.0	23.5	36.2	30.7	1.7
Owner-Occupied Units by Geography	502,391	3.5	17.9	39.4	38.6	0.6
Occupied Rental Units by Geography	258,342	14.6	32.8	31.4	18.2	3.0
Vacant Units by Geography	63,740	16.5	29.8	30.0	19.0	4.7
Businesses by Geography	230,986	5.7	19.8	32.8	40.4	1.3
Farms by Geography	5,398	3.2	15.9	41.6	38.4	0.8
Family Distribution by Income Level	488,382	20.9	17.3	20.9	40.9	0.0
Household Distribution by Income Level	760,733	24.4	15.5	17.5	42.6	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$84,990	Median Housing Value			\$188,000
			Median Gross Rent			\$888
			Families Below Poverty Level			7.8%

*Source: 2020 U.S. Census and 2022 D&B Data*

*Due to rounding, totals may not equal 100.0%*

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

The OCC evaluated the disparity between the median incomes of families within the AA and cost of housing. Based on 2015 ACS data, the median family income for the Cincinnati MMSA was \$69,949. Based on this information, low-income families earned less than \$34,975 and moderate-income families earned less than \$55,959. The median housing value in the AA was \$159,392. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$874 for a low-income borrower and \$1,399 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$856. Housing is generally affordable for LMI borrowers in the Cincinnati MMSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 188.6 and by the fourth quarter of 2022 had increased to 258.1, representing a 36.9 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area, which has generally been affordable for LMI borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Cincinnati MMSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 10.3 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, professional and business services, healthcare services, financial services, and manufacturing contributed to job growth and are important economic drivers of the economy. Cincinnati's recovery from the COVID-19 pandemic has been slow, and hourly wages have decreased and are behind state and national averages. Global chip production is expected to rise in the coming months leading to a boost in the steel and automobile industry. However, the Russian-Ukraine conflict could disrupt the supply-chain and neon gas needed for semiconductors and manufacturing. Cincinnati's aging population coupled with a low death rate will ensure a continued need for medical services and job growth in healthcare. A well-educated workforce along with the low cost of office space will provide professional and financial firms with opportunities to expand and thrive in the area. Housing appreciation continues to be in the double digits due to high demand and low supply. The largest employers are Kroger Co., Cincinnati Children's Hospital Medical Center, TriHealth Inc., St. Elizabeth Healthcare, and University of Cincinnati.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Cincinnati, OH-KY-IN MMSA was 4.4 percent as of January 2020. In April 2020, unemployment levels peaked at 13 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and

business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Cincinnati, OH-KY-IN MMSA was three percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC held a listening session, completed one community contact, and reviewed information from two additional contacts completed during the evaluation period within the Cincinnati, OH-KY-IN MMSA to better understand area credit and community needs. Community group leaders in the listening sessions indicated needs for affordable housing, more bank involvement in communities, and workforce development programs. Participants also expressed the need for CD services including financial coaching, financial education, and face-to-face outreach. Outreach was cited especially as the COVID-19 pandemic subsides. Specifically, community group leaders cited the following needs:

- Preservation of affordable rental and housing units
- Policy actions to create more affordable rental properties
- Affordable housing units created by using investment vehicles outside of LIHTCs
- Offering small dollar mortgage loan products under \$100,000
- Providing services for unbanked and underbanked individuals
- Workforce development programs and associated housing
- Financial coaching opportunities
- Financial education, specifically on how to use credit cards, debit cards, and cash applications either offered by banks or fintech firms
- Financial institution outreach through either the physical presence of branches or maintaining physical face-to-face relationships

## Scope of Evaluation in the Cincinnati MMSA

The Cincinnati MMSA received a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CINCINNATI MMSA

### LENDING TEST

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

Based on a full-scope review, the bank's performance in the Cincinnati MMSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market share rankings as compared to their deposit market share ranking. HNB's lending market share for home mortgages and small loans to businesses exceeded their deposit market share.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
<b>Full-Scope</b>					
Cincinnati MMSA	14,172	6,409	111	164	20,856
<b>Total</b>	14,172	6,409	111	164	20,856

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
<b>Full-Scope</b>					
Cincinnati MMSA	\$3,258,356	\$641,127	\$7,916	\$379,359	\$4,286,758
<b>Total</b>	\$3,258,356	\$641,127	\$7,916	\$379,359	\$4,286,758

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 2.8 percent. The bank ranked fourth among 51 depository financial institutions placing it in the top eight percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 4.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked fourth among 699 home mortgage lenders in the AA, which placed it in the top 0.5 percent of lenders. The top three lenders with a combined market share of 18.2 percent were Fifth Third Bank, National Association with 6.9 percent, Union Savings Bank with 6.4 percent, and US Bank, National Association with 4.9 percent.

According to peer small business data for 2021, the bank had a market share of 5.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked sixth among 184 small business lenders in the AA, which placed it in the top four percent of lenders. The top three lenders with a combined market share of 43.3 percent were American Express National Bank with 18.6 percent, US Bank, National Association with 14.8 percent, and JPMorgan Chase Bank, National Association with 9.9 percent.



According to peer farm data for 2021, the bank had a market share of 8.2 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth among 25 small farm lenders in the AA, which placed it in the top 16 percent of lenders. The top three lenders with a combined market share of 54.3 percent were US Bank, N.A. with 28 percent, JPMorgan Chase Bank, N.A. with 16 percent, and Fifth Third Bank, N.A. with 10.3 percent.

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

The bank exhibited a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the Cincinnati MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

#### ***2020-2021***

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending in moderate income geographies.

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

Refer to Table Q in the Cincinnati MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

#### ***2020-2021***

The bank's percentage of small business loans in low-income geographies approximated the percentage of businesses in those geographies and was near to the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### ***Small Loans to Farms***

Refer to Table S in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small farm loans was good.

2020-2021

The bank's percentage of small farm loans in low-income geographies exceeded both the percentage of small farms in those geographies and the aggregate distribution of those loans. The percentage of small farm loans in moderate-income geographies was near to the percentage of small farms in those geographies and exceeded the aggregate distribution of loans.

2022

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to worse distribution of lending in both low- and moderate-income geographies.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

2020-2021

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

2022

The bank's performance in 2022 was stronger than performance in 2020-2021 due to better distribution of lending to low-income borrowers.

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

Refer to Table R in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

2020-2021

The bank did not collect or consider the gross annual revenues in the underwriting of ten percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### ***Small Loans to Farms***

Refer to Table T in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small farm loans was good.

2020-2021

The bank's percentage of small farm loans with revenues of \$1 million or less was below the percentage of farm with gross revenues of \$1 million or less but exceeded the aggregate distribution of small farm loans.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

## **Community Development Lending**

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 164 CD loans totaling \$379.4 million, which represented 79.1 percent of the allocated tier 1 capital. CD loans primarily supported revitalization and stabilization efforts and/or economic development. By dollar volume, 16.7 percent of these loans funded affordable housing, 25.9 percent funded economic development, 42.7 percent funded revitalization and stabilization efforts, and 14.8 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank purchased a \$10 million participation in a construction loan to repurpose a commercial building for new retail space. This building, located in downtown Cincinnati, borders an Opportunity Zone and three LMI census tracts. Permanent financing for this project included leverage financing from the Port of Greater Cincinnati Development Authority, the Ohio Enterprise Bond Fund, the Ohio Regional Bond Fund, and a grant from the City of Cincinnati.
- HNB made a \$35 million loan to acquire and renovate a 492-unit affordable housing apartment complex. The property is in a moderate-income census tract, which is in an economically distressed area designated as an Opportunity Zone. This loan is responsive to an identified need for affordable housing.
- HNB made a \$45 million loan to finance the construction of a 276-unit multifamily property, including 11,000 square feet of commercial space. This property located in a low-income census tract, is surrounded by other LMI tracts, and is anticipated to attract residents and businesses to the LMI area. The project will create new LMI retail jobs.

## Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 925 loans under its flexible lending programs totaling \$91.3 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	364	\$60,111
Debt Manager	201	\$3,669
ECO-LINK Unsecured	1	\$50
Equity - 7 Year Fixed - ECO Link	3	\$84
KY HC - 10 Year Fixed - MRB 2nd Lien	1	\$6
KY HC - 30 Year Fixed - FHA	1	\$221
OH HFA - All Products	79	\$13,322
Port - 30 Year Fixed - CAM CRA	42	\$5,452
Port - 30 Year Fixed - Hometown Mortgage	9	\$1,126
Unsecured HI	164	\$3,043
Lift Local – Small Business	60	\$4,264
<b>Total</b>	<b>925</b>	<b>\$91,348</b>

## INVESTMENT TEST

The institution's performance under the Investment Test in the Cincinnati MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Cincinnati MMSA is excellent.

### Number and Amount of Qualified Investments

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Cincinnati MMSA	32	16,086	336	79,791	368	100.0	95,877	100	15	8,714
<b>Total</b>	<b>32</b>	<b>16,086</b>	<b>336</b>	<b>79,791</b>	<b>368</b>	<b>100.0</b>	<b>95,877</b>	<b>100</b>	<b>15</b>	<b>8,714</b>

\* 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.

The bank made 336 investments totaling \$79.8 million during the evaluation period, which included donations totaling \$951,507. The dollar volume of current- and prior- period investments represented 20.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution made significant use of innovative and/or complex investments to support CD initiatives. The bank made seven complex LIHTC syndications totaling \$43.5 million.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$5 million to fund a 501(c)(3), tax-exempt, private, non-profit corporation. The mission and strategic focus of the non-profit are to strengthen the core assets of downtown Cincinnati by revitalizing and stabilizing the Central Business District and surrounding LMI neighborhoods.
- HNB purchased a 10-year, \$31.5 million, Income Tax Revenue Bond. Proceeds will be used to finance roadway improvements in a city in the AA used by all residents. The city provides essential services to 44,399 individuals who make up 11,126 families. Of those families, 61 percent are LMI.
- HNB purchased a \$1.3 million investment in a taxable special obligation bond for the re-development of a rundown property adjacent to four LMI census tracts. The re-development of the property will create permanent jobs in the census tract.

## SERVICE TEST

The bank's performance under the Service Test in the Cincinnati MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Cincinnati MMSA was good.

### Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full-Scope													
Cincinnati MMSA	100	36	100	0	33.3	33.3	33.3	0	7.2	21.6	36.1	33.5	0

Totals may not equal 100.0 percent due to rounding.

The NA category consists of geographies that have not been assigned an income classification.

HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. The bank did not operate any branches in low-income geographies. The OCC gave positive consideration for six branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, two were located within 1,000 feet of an LMI geography, and the remaining four serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this PE. This has a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 42 ATMs in the AA, 39 of which were deposit-taking. HNB provided data that indicated 84 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 36.1 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery system conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full-Scope							
Cincinnati MMSA	0	0	0	0	0	0	0

The NA category consists of geographies that have not been assigned an income classification.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 36 traditional branches in the Cincinnati MMSA. All branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, and 34 of these branches, including all branches in moderate-income geographies, operated from 9:00 a.m. to 12:00 p.m. on Saturdays. Drive-thru facilities operated at 34 of the traditional branches, including all but one branch in moderate-income geographies, and maintained the same hours as the branches.

## **Community Development Services**

The institution is a leader in providing CD services.

HNB employees provided 282 qualified CD service activities to 40 organizations with 1,425 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 44 of these activities with 11 bank employees providing 646 service hours to 11 organizations. The bank's CD services primarily focused on community services targeted to LMI individuals, which represented 213 service activities and 1,076 service hours. Of these hours, 203 were related to financial education, which is an identified need within the AA.

Service activity examples during the evaluation period include:

- An HNB employee served on the board of directors and two other committees, for an affordable housing organization, totaling 40 hours of service across the evaluation period. The organization serves multiple counties within the Cincinnati MMSA and provides homeownership education, financial management/budget counseling, and post-purchase workshops for LMI individuals, among other services. During the evaluation period, two additional employees provided 13 hours of homebuyer education in cooperation with this organization.
- Twenty-four HNB employees provided 83 hours of financial empowerment education to LMI children and students at elementary schools, summer camps, and community organizations during the evaluation period. The curriculum included budgeting and saving, financial priorities, and the importance of credit and banking accounts.
- An HNB employee served on the board of directors and executive committee and a second employee served on the loan committee of a local CDC that benefits Hamilton County, Ohio. The CDC is a commercial capital lender, a growth lab for startups, and an economic development partner that specializes in Small Business Association SBA lending and growth. Collectively, these two employees provided 63 hours of service across the evaluation period.



## **Weirton-Steubenville, WV-OH MMSA**

**CRA rating for the Weirton MMSA<sup>3</sup>: Satisfactory**

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

**The Investment Test is rated: Low Satisfactory**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good, and borrower distribution of lending was good.
- The bank is a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an adequate level of qualified investments, grants, and donations.
- Service delivery systems are accessible to geographies and individuals of different income levels, and the institution provides an adequate level of CD services.

## **Description of Institution's Operations in the Weirton-Steubenville, WV-OH MMSA**

HNB delineated two counties within the Weirton MMSA including Hancock County in West Virginia and Jefferson County in Ohio as the AA. Refer to appendix A for the list of counties reviewed.

HNB had \$400 million in deposits in the Weirton MMSA, representing 0.3 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated six branches and seven ATMs, of which six were deposit taking, representing 0.6 percent of total branches and 0.4 percent of total ATMs. The Weirton MMSA was HNB's third smallest rating area based on deposits. The bank originated and purchased approximately \$125.5 million in home mortgage and small business loans within the Weirton MMSA, representing 0.2 percent of total bank loan originations and purchases.

According to FDIC deposit-market share data, as of June 30, 2022, 11 FDIC-insured institutions operated 28 branches in the AA. HNB ranked first in deposit share, with 20.3 percent. The top two other banks by deposit market share were Hancock County Savings Bank, FSB with 17.7 percent and WesBanco Bank, Inc. with 16 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following tables provide a summary of the demographic data, including housing, business, and economic information for the Weirton-Steubenville, WV-OH MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Weirton MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	6.5	16.1	64.5	12.9	0.0
Population by Geography	98,254	2.3	13.5	74.0	10.2	0.0
Housing Units by Geography	47,058	2.6	13.2	74.1	10.0	0.0
Owner-Occupied Units by Geography	29,267	1.7	8.4	77.9	12.0	0.0
Occupied Rental Units by Geography	11,585	3.8	21.2	68.3	6.6	0.0
Vacant Units by Geography	6,206	4.9	21.3	67.1	6.7	0.0
Businesses by Geography	5,146	1.6	14.4	70.9	13.1	0.0
Farms by Geography	162	1.2	7.4	82.7	8.6	0.0
Family Distribution by Income Level	26,497	19.4	19.4	21.4	39.8	0.0
Household Distribution by Income Level	40,852	24.5	15.9	19.0	40.6	0.0
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$52,770	Median Housing Value			\$85,139
			Median Gross Rent			\$598
			Families Below Poverty Level			12.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Weirton MMSA</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)	30	3.3	13.3	73.3	10.0	0.0
Population by Geography	94,344	3.7	9.4	72.9	14.0	0.0
Housing Units by Geography	46,776	3.4	10.5	73.2	12.9	0.0
Owner-Occupied Units by Geography	28,415	0.4	7.2	78.1	14.3	0.0
Occupied Rental Units by Geography	11,802	8.2	15.8	65.6	10.5	0.0
Vacant Units by Geography	6,559	7.7	15.3	66.0	11.1	0.0
Businesses by Geography	6,581	7.0	7.7	68.2	17.2	0.0
Farms by Geography	218	0.5	6.9	80.3	12.4	0.0
Family Distribution by Income Level	24,932	20.4	17.9	22.3	39.4	0.0
Household Distribution by Income Level	40,217	24.8	15.7	18.5	40.9	0.0
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$61,496	Median Housing Value			\$97,830
			Median Gross Rent			\$672
			Families Below Poverty Level			11.4%

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

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

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Weirton MMSA was \$52,770. Based on this information, low-income families earned less than \$26,385 and moderate-income families earned less than \$42,216. The median housing value in the AA is \$85,139. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$660 for a low-income borrower and \$1,055 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$457. Housing is generally affordable for LMI borrowers in the Weirton MMSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 201.7 and by the fourth quarter of 2022 had increased to 271.5, representing a 34.6 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for low- and/or moderate-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Weirton MMSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 12.4 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, financial, manufacturing, logistics, and health services were all contributors to growth and are important economic drivers of the economy. Recovery in the area is expected to lag that of the nation. Long-term prosperity has a negative outlook due to fewer manufacturing jobs and population loss. Factory jobs make up a large portion of manufacturing jobs in the region and, because of higher costs, a smaller labor pool, and automation, these jobs are contracting. Job declines will also translate to less spending in the area. House price appreciation is lagging the nation, and new home building is also low among comparable metropolitan areas. Population loss continues to be a primary concern for the area; the population has declined every year since 1980. The top employers include Trinity Medical Center, Mountaineer Park Inc, Weirton Medical Center, and Bechtel Construction Co.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Weirton-Steubenville, WV-OH MMSA was 6.9 percent as of January 2020. In April 2020, unemployment levels peaked to 17.4 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Weirton-Steubenville, WV-OH MMSA was 4.6

percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts completed during the evaluation period within the Weirton-Steubenville, WV-OH MMSA to better understand area credit and community needs. One contact worked for an organization which focuses on affordable housing, utility assistance, child advocacy, and ending domestic violence. The other contact worked for an organization focused on affordable housing and social services. The contacts cited the following needs:

- Volunteers to provide financial literacy training
- Matching funds for government programs
- Serving on boards of directors
- Affordable housing
- Home improvement loans and/or small dollar loans with flexible terms
- Assistance with utility bills
- Homebuyer counseling programs and advocates
- Grants to non-profits
- No or low fee checking and savings accounts

## Scope of Evaluation in the Weirton MMSA

The Weirton MMSA received a full-scope review.

Home mortgages received greater weight than small loans to businesses. HNB originated or purchased too few small loans to farms in this rating area to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WEIRTON MMSA

### LENDING TEST

The bank's performance under the Lending Test in the Weirton MMSA is rated High Satisfactory

Based on a full-scope review, the bank's performance in the Weirton MMSA is good.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering Weirton's lending market share rankings as compared to its deposit market share ranking.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farms	Community Development	Total
<b>Full-Scope</b>					
Weirton MMSA	854	364	6	8	1,232
<b>Total</b>	854	364	6	8	1,232

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farms	Community Development	Total
<b>Full-Scope</b>					
Weirton MMSA	88,749	29,467	321	6,966	125,503
<b>Total</b>	88,749	29,467	321	6,966	125,503

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 20.3 percent. The bank ranked first among 11 depository financial institutions, placing it in the top ten percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 13.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 194 home mortgage lenders in the AA, which placed it in the top two percent of lenders. The top three lenders with a combined market share of 34.2 percent were Hancock County Savings Bank with 13.6 percent, HNB with 13.2 percent, and US Bank, National Association with 7.4 percent.

According to peer small business data for 2021, the bank had a market share of 9.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth among 60 small business lenders in the AA, which placed it in the top seven percent of lenders. The top three lenders with a combined market share of 35.6 percent were Synchrony Bank with 14.2 percent, American Express National Bank with 11.9 percent, and US Bank, National Association with 9.5 percent.

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

The bank exhibits an adequate geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the Weirton MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

#### ***2020-2021***

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to worse geographic distribution of lending in low-income geographies.

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

Refer to Table Q in the Weirton MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

#### ***2020-2021***

The bank's percentage of small business loans in low-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies was near to the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited a good geographic distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

#### ***2020-2021***

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families but exceeded the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending in low- and moderate-income geographies.

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

Refer to Table R in the Weirton MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

#### ***2020-2021***

The bank did not collect or consider the gross annual revenues in the underwriting of 6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

## Community Development Lending

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated eight CD loans totaling \$7 million, which represented 16.9 percent of the allocated tier 1 capital. These CD loans primarily supported affordable housing, community services to LMI individuals, revitalization, and stabilization efforts and/or economic development. By dollar volume, 68 percent of CD loans funded economic development, 2 percent funded revitalization and stabilization efforts, and 30.1 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- HNB originated a \$2.1 million loan to a community agency that serves northern West Virginia and Jefferson County, Ohio. The organization provides various programs and services to individuals and families to overcome the causes of poverty and live healthy lives. The organization offers services such as health services, housing assistance, support services, and victim and child advocacy.
- HNB originated two PPP loans for \$120,000 and \$15,000 to revitalize and stabilize a faith-based organization. The loans afforded the organization, located in an LMI census tract, an opportunity to keep their workforce employed during the COVID-19 pandemic.

## Product Innovation and Flexibility

The institution makes use of flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 133 loans under its flexible lending programs totaling \$3.3 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	10	\$655
Debt Manager	54	\$846
OH HFA - All Products	1	\$49
Port - 30 Year Fixed - CAM CRA	1	\$48
Unsecured HI	60	\$856
WV HDF - All Products	5	\$603
Lift Local – Small Business	2	\$197
<b>Total</b>	<b>133</b>	<b>\$3,254</b>



## INVESTMENT TEST

The institution's performance under the Investment Test in the Weirton MMSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Weirton MMSA is adequate.

### Number and Amount of Qualified Investments

The institution had an adequate level of qualified CD investment and grants, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Weirton MMSA	4	1,346	5	41	9	100.0	1,387	100.0	1	398
<b>Total</b>	4	1,346	5	41	9	100.0	1,387	100.0	1	398

\* 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.

The bank made five investments totaling \$41,000 during the evaluation period, all of which were qualifying donations to two organizations. The dollar volume of current- and prior-period investments represented 3.4 percent of allocated tier 1 capital.

The institution exhibited adequate responsiveness to credit and community economic development needs. Investments were responsive to identified community service needs as 100 percent funded community services to LMI individuals. The institution does not use innovative and/or complex investments to support CD initiatives. Donations were made to an organization focused on meeting immediate and emergency food needs of LMI families and individuals.

## SERVICE TEST

The bank's performance under the Service Test in the Weirton MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Weirton MMSA was good.

### Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				L o w	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full-Scope													
Weirton MMSA	100.0	6	100.0	16.7	0	50.0	33.3	0	3.7	9.4	75.9	14.0	0

Totals may not equal 100.0 percent due to rounding.

The NA category consists of geographies that have not been assigned an income classification.

HNB's distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. The bank did not operate any branches in moderate-income geographies. The OCC gave positive consideration for one branch in a MUI geography that is located within 1,000 feet of an LMI geography.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had seven ATMs in the AA, six of which were deposit-taking. HNB provided data that indicated 74 percent of customers in LMI geographies used the bank's mobile application or accessed online banking during the fourth quarter of 2022. This was an increase of 35.8 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery system rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full-Scope							
Weirton MMSA	0	1	0	0	-1	0	0

The NA category consists of geographies that have not been assigned an income classification.

To the extent changes have been made, the institution's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in a middle-income geography during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated six branches in the Weirton MMSA. Of these, four were traditional branches and two were remote drive-thru branches. For the traditional branches, three operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, while one operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and from 9:00 a.m. to 5:00 p.m. on Fridays. All four traditional branches operated on Saturdays, from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at all of the traditional branches

and maintained the same hours as the branch. The two remote drive-thru branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, and one operated on Saturdays from 9:00 a.m. to 12:00 p.m.

## **Community Development Services**

The institution provides an adequate level of CD services.

HNB employees provided 13 qualified CD service activities to four organizations with 141 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in two of these activities with one bank employee providing 45 service hours to two organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented all activities and service hours in this AA.

Service activity examples during the evaluation period include:

- An HNB Vice President served on the board of directors at a non-profit that provides emergency services to residents facing homelessness and poverty. The non-profit provides food, clothing, furniture, and employment services. This employee also served on the board of directors for a second non-profit that provides health services, housing services, and supportive services to LMI clients.

## Youngstown-Warren-Boardman, OH-PA MMSA

**CRA rating for the Youngstown MMSA<sup>4</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good, and borrower distribution of lending was excellent.
- The bank is a leader in making CD loans, which had a neutral effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems are accessible to geographies and individuals of different income levels, and the institution provides an adequate level of CD services.

## Description of Institution's Operations in the Youngstown-Warren-Boardman, OH-PA MMSA

HNB delineated the entire Youngstown MMSA as an AA. This included the counties of Mahoning and Trumbull in Ohio and Mercer County in Pennsylvania.

HNB had \$3.7 billion in deposits in the Youngstown MMSA, representing 2.5 percent of the bank's total deposits as of June 30, 2022. The Youngstown MMSA was HNB's eighth largest rating area based on deposits. As of December 31, 2022, the bank operated 30 branches and 44 ATMs, of which 38 were deposit taking, representing 2.8 percent of total branches and 2.2 percent of total ATMs.

The bank originated and purchased approximately \$1 billion in home mortgage and small business loans within the Youngstown MMSA representing 1.5 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 16 FDIC-insured institutions operated 122 branches in the AA. HNB ranked first in deposit market share, with 24.7 percent. The top two other banks by deposit market share were The Farmers National Bank of Canfield with 15.6 percent and First National Bank of Pennsylvania with 12 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographic data, including housing, business, and economic information for the Youngstown-Warren-Boardman, OH-PA MMSA AA.

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<sup>4</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	155	14.2	20.0	45.8	20.0	0.0
Population by Geography	556,243	8.7	15.4	50.3	25.7	0.0
Housing Units by Geography	258,796	9.3	16.6	49.6	24.5	0.0
Owner-Occupied Units by Geography	161,805	5.1	12.5	53.0	29.3	0.0
Occupied Rental Units by Geography	68,359	14.5	23.7	44.7	17.0	0.0
Vacant Units by Geography	28,632	20.5	22.6	42.0	14.9	0.0
Businesses by Geography	35,239	7.9	12.6	44.8	34.7	0.0
Farms by Geography	1,387	2.2	6.6	58.3	32.9	0.0
Family Distribution by Income Level	146,502	20.5	18.4	20.6	40.5	0.0
Household Distribution by Income Level	230,164	23.9	16.1	18.0	42.0	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$98,762
			Median Gross Rent			\$630
			Families Below Poverty Level			12.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	164	8.5	22.6	47.0	20.7	1.2
Population by Geography	541,243	5.7	17.8	49.7	26.1	0.7
Housing Units by Geography	259,266	6.7	19.3	49.2	24.2	0.6
Owner-Occupied Units by Geography	162,885	3.5	16.0	51.6	28.6	0.4
Occupied Rental Units by Geography	68,722	11.4	24.8	46.1	16.4	1.3
Vacant Units by Geography	27,659	14.2	24.8	42.8	17.8	0.4
Businesses by Geography	52,787	6.2	16.4	42.4	34.6	0.4
Farms by Geography	1,823	1.9	12.4	53.8	31.8	0.2
Family Distribution by Income Level	141,805	22.1	16.8	21.1	40.0	0.0
Household Distribution by Income Level	231,607	24.4	16.4	17.4	41.8	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$63,220	Median Housing Value			\$108,950
			Median Gross Rent			\$683
			Families Below Poverty Level			12.9%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Youngstown MMSA was \$55,174. Based on this information, low-income families earned less than \$27,587 and moderate-income families earned less than \$44,139. The median housing value in the AA is \$98,762. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$690 for a low-income borrower and \$1,103 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$530. Housing is generally affordable for LMI borrowers in the Youngstown MMSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the index was 167.8 and by the fourth quarter of 2022 had increased to 232.6, representing a 38.6 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for LMI borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Youngstown MMSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 12.7 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, healthcare services and manufacturing were contributors to growth and are important economic drivers of the economy. Job growth through mid-year 2022 was only half of the national rate. Healthcare and office job payrolls have shrunk, offsetting some of the gains from manufacturing and leisure and hospitality. The area is heavily reliant on manufacturing, particularly the steel industry, which makes up a large part of high paying jobs in the area. Even with housing price appreciation, housing remains very affordable. The population has been declining for years, and the labor market is at a cyclical low. Additionally, there is low educational attainment in the region with almost a third less of the population having a bachelor's degree compared to the national average. The top employers include Mercy Health, Windsor House, Youngstown Air Reserve Station, and Steward Valley Care Health System.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Youngstown-Warren-Boardman, OH-PA MMSA was 6.9 percent as of January 2020. In April 2020, unemployment levels peaked at 18.8 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Youngstown-Warren-Boardman, OH-PA MMSA was 4.4 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

## Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts completed during the evaluation period within the Youngstown-Warren-Boardman, OH-PA MMSA to better understand area credit and community needs. One contact worked for an organization which focuses on community services for LMI individuals and families. The other contact worked for an organization which focuses on revitalization and affordable housing in Mahoning County, OH. One contact indicated that HNB provides good lending products for LMI residents, including home mortgage loans. The contact indicated awareness of multiple instances where deals fell apart at closing because of miscommunication between the bank and borrowers. The contact indicated HNB staff could improve communication with LMI borrowers and issues could be corrected through additional training. The other contact cited that HNB has provided small dollar grants to their organization through time. The contacts cited the following needs:

- Affordable housing, including rental properties
- Grants for financial coaching and job training programs
- Bank employee representation on non-profit boards of directors and loan review committees, if the organizations disperse funds into the community
- Smaller dollar loans for home repairs and rehabilitation of older properties and housing stock
- Construction financing and lines of credit, including to non-profits
- Home ownership counseling program or financial support for non-profits offering these programs
- Grants for food distribution and assistance
- Bank employees providing financial education classes, credit counseling, and one-on-one coaching for individuals and small businesses
- Grants and/or the development of transitional housing programs

## **Scope of Evaluation in the Youngstown MMSA**

The Youngstown MMSA received a full-scope review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN YOUNGSTOWN MMSA**

### **LENDING TEST**

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

Based on a full-scope review, the bank's performance in the Youngstown MMSA was excellent.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
<b>Full-Scope</b>					
Youngstown MMSA	6,553	3,039	52	80	9,724
<b>Total</b>	6,553	3,039	52	80	9,724

<b>Dollar Volume of Loans (\$000s)</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
<b>Full-Scope</b>					
Youngstown MSA	726,962	247,548	3,361	47,374	1,025,245
<b>Total</b>	726,962	247,548	3,361	47,374	1,025,245

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 24.7 percent. The bank ranked first among 16 depository financial institutions.

According to peer mortgage data for 2021, the bank had a market share of 13 percent based on the number of home mortgage loans originated or purchased. The bank ranked first among 436 home mortgage lenders in the AA. The top three lenders with a combined market share of 28.1 percent were HNB with 13 percent, Seven Seventeen Credit Union with 8.5 percent, and Rocket Mortgage with 6.6 percent.

According to peer small business data for 2021, the bank had a market share of 9.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 114 home mortgage lenders in the AA, which placed it in the top three percent of lenders. The top three lenders with a combined market share of 34 percent were American Express National Bank with 12.4 percent, JPMorgan Chase, National Association with 12 percent, and HNB with 9.7 percent.

According to peer small farm data for 2021, the bank had a market share of 7.3 percent based on the number of small loans to farms originated or purchased. The bank ranked fifth among 14 farm lenders in the AA, which placed it in the top 36 percent of lenders. The top three lenders with a combined market share of 57.4 percent were Farmers National Bank with 23.4 percent, JPMorgan Chase Bank, National Association with 18.4 percent, and Wells Fargo Bank, National Association with 15.6 percent.

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

The bank exhibited a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the Youngstown MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.



2020-21

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the Youngstown MMSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

2020-21

The bank's percentage of small business loans in low-income geographies was near to both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies approximated the percentage of businesses in those geographies and exceeded the aggregate distribution of loans.

2022

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to worse distribution of lending in low-income geographies.

### ***Small Loans to Farms***

Refer to Table S in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small farm loans was excellent.

2020-2021

The bank's percentage of small farm loans in low-income geographies exceeded both the percentage of the farms in those geographies and the aggregate distribution of loans. The percentage of small farm loans in moderate-income geographies was below the percentage of the farms in those geographies and exceeded the aggregate distribution of loans.

2022

The bank did not originate or purchase a sufficient number of small farm loans in 2022 to perform a meaningful analysis.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

2020-21

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table R in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

2020-21

The bank did not collect or consider the gross annual revenues in the underwriting of 9.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses

with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### ***Small Loans to Farms***

Refer to Table T in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small farm loans was good.

2020-2021

The bank's percentage of small farm loans with revenues of \$1 million or less was near to the percentage of farms in those geographies but exceeded the aggregate distribution of loans.

2022

The bank did not originate or purchase a sufficient number of small farm loans in 2022 to perform a meaningful analysis.

### **Community Development Lending**

The institution is a leader in making CD loans. CD lending further supports the overall Outstanding conclusion for the Lending Test.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 80 CD loans totaling \$47.4 million, which represented 12.4 percent of the allocated tier 1 capital. CD loans primarily supported economic development and revitalization and stabilization. By dollar volume, 66.4 percent funded economic development, 28 percent funded revitalization and stabilization efforts, and 5.7 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- HNB originated one loan totaling \$7.3 million loan to assist in the expansion of a local plant. This expansion project included a \$1.7 million community and economic development grant from the state of Pennsylvania. Upon completion, this expansion will help create 90 new job opportunities for LMI individuals.
- HNB renewed and increased an \$8 million working line of credit to a manufacturing business. The company is adjacent to five LMI geographies and will help to retain employment opportunities for 116 people.

- HNB originated a \$2.1 million SBA 7(a) loan for permanent working capital for a small equipment financing company. This working capital will help to retain 63 jobs and create five new jobs.

## Product Innovation and Flexibility

HNB uses innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 612 loans under its flexible lending programs totaling \$18.3 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

Flexible Lending Product	# of Loans	Dollar Amount (000s)
Conventional Flexible - All Products	97	\$8,030
Debt Manager	258	\$4,263
Equity - 7 Year Fixed - ECO Link	1	\$20
Mercy Hospital Loans	3	\$31
OH HFA - All Products	10	\$1,128
Port - 30 Year Fixed - CAM CRA	6	\$501
Port - 30 Year Fixed - CAM CRA Section 8	1	\$121
Port - 30 Year Fixed - Hometown Mortgage	2	\$244
Unsecured HI	216	\$3,021
Lift Local – Small Business	18	\$907
<b>Total</b>	612	\$18,266

## INVESTMENT TEST

The institution's performance under the Investment Test in the Youngstown MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Youngstown MMSA is excellent.

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Youngstown MMSA	20	5,405	30	18,186	50	100.0	23,591	100.0	7	5,607
<b>Total</b>	20	5,405	30	18,186	50	100.0	23,591	100.0	7	5,607

\* 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.

The bank made current period investments totaling \$18.2 million during the evaluation period, which includes 28 qualifying grants and donations totaling \$399,000 to 13 organizations. The dollar volume of current- and prior- period investments represented 6.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 100 percent of investments supported affordable housing. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- A \$10.7 million Federal LIHTC equity investment in the Youngstown MSA. This included a 43-unit new construction senior apartment complex development located in Liberty Township, Ohio. The energy-efficient development will feature 1- and 2-bedroom units and senior-specific amenities. The project also featured supportive services and helps address the need of affordable senior housing.
- A \$7.1 million LIHTC investment in the acquisition and rehabilitation of a 100-unit affordable housing project in Mahoning County. The property needed a complete rehabilitation to maintain and improve the physical structure, while also preserving the existing project-based Section 8 contract. This rehabilitation resulted in improved living conditions. In addition to the physical preservation, the rehabilitation included supportive services for senior and/or disabled households.
- A \$100,000 donation made to a high-tech business incubator that promotes innovative technologies and long-term, sustainable employment opportunities, with a focus on information technology and advanced manufacturing and provides Small Business Education and Development for Minority and Women owned businesses located throughout Mahoning Valley.

## SERVICE TEST

The bank's performance under the Service Test in the Youngstown MMSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Youngstown MMSA was adequate.

## Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope													
Youngstown MMSA	100	30	100	0	20.0	43.3	36.7	0	5.7	17.8	49.7	26.1	0

Totals may not equal 100 percent due to rounding. The NA category consists of geographies that have not been assigned an income classification.

HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. The bank did not operate any branches in low-income geographies. The OCC gave positive consideration for five branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, two were located within 1,000 feet of an LMI geography, and the remaining three serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this PE.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 44 ATMs in the AA, of which 38 were deposit-taking. HNB provided data that indicated 78.6 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 35.8 percent for customers in LMI geographies since the first quarter of 2020.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope							
Youngstown MMSA	0	20	-2	-2	-8	-8	0

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

To the extent changes have been made, the institution's record of opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed 20 branches, four of which were in LMI geographies. The branch closures were the result of exiting a relationship to operate branches in a local supermarket chain and branch consolidation because of the TCF merger.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 30 branches in the Youngstown MMSA. Of these, 27 were traditional branches, two were remote drive-thru branches, and one was a limited-service Private Banking branch. For the traditional branches, 17 operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, while nine operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and from 9:00 a.m. to 5:00 p.m. on Fridays. In total, 22 of the traditional branches, including three located in moderate-income geographies, operated on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 22 of the traditional branches, including three branches located in moderate-income geographies, and maintained the same hours as the branch. The two remote drive-thru branches operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and from 9:00 a.m. to 5:00 p.m. on Fridays. One of these remote drive-thru branches operated on Saturdays from 9:00 a.m. to 12:00 p.m. The Private Banking branch operated from 8:00 a.m. to 5:00 p.m., Monday through Friday.

## Community Development Services

The institution provides an adequate level of CD services.

HNB employees provided 150 qualified CD service activities to 24 organizations with 763 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 37 of these activities with nine bank employees providing 381 service hours to 12 organizations, which was responsive to needs identified by community contacts. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 149 service activities and 757 service hours.

Service activity examples during the evaluation period include:

- A Vice President served on the board of directors of a non-profit healthcare system for a total of 60 hours during the evaluation period. The non-profit uses a holistic assessment, focusing on the social determinants of health to provide preventative healthcare, screenings, medical and dental care, and education to LMI residents at reduced or no cost. The healthcare system provides resources and funding designed to target minority and underserved populations at risk for adverse health outcomes.
- A Senior Vice President served on the board of directors of a small business development organization for a total of 43 hours during the evaluation period. The organization provides entrepreneurial counseling, access to capital, technology integration and facilities, and equipment lending to small businesses, including minority-owned businesses.
- Thirty-seven Huntington employees volunteered at three local schools, totaling 211 hours, to facilitate real-life financial decision-making activities that teach third to twelfth grade LMI students how to manage money, use banking products, make wise spending decisions, and more.

## State Ratings

### State of Colorado

**CRA rating for the state of Colorado:** Satisfactory

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

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was poor.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made a good level of qualified investments, grants, and donations.
- The weaker combined Investment Test performance in the limited-scope AAs negatively affected the bank's overall Investment Test rating for the state of Colorado.
- Service delivery systems are readily accessible to geographies and individuals of different income levels, and the institution is a leader in providing CD services.

### Description of Institution's Operations in Colorado

HNB delineated three AAs within Colorado. These AAs consisted of the Denver MSA, the Boulder MSA, and the Colorado Springs MSA. Colorado was HNB's 10<sup>th</sup> largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$882 million billion in deposits in Colorado representing 0.6 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 33 branches and 32 ATMs, of which all 32 were deposit-taking. This represented 3.1 percent of total bank branches and 1.6 percent of total ATMs. The bank originated and purchased approximately \$906.2 million in home mortgage and \$57.5 million in small business loans within Colorado representing 1.5 percent of total bank loan originations and purchases.

#### Denver MSA

HNB had \$693 million in deposits in the Denver MSA, representing 0.5 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 24 branches and 23 ATMs, of which 23 were deposit taking, representing 2.2 percent of total branches and 1.2 percent of total ATMs. The bank originated and purchased approximately \$733.5 million in home mortgage and small business loans within the Denver MSA representing 1.1 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 67 FDIC-insured institutions were



operating 588 branches in the AA. HNB ranked 20<sup>th</sup> in deposit share, with 0.6 percent. The top three banks by deposit market share were Wells Fargo Bank, National Association with 23 percent, JPMorgan Chase Bank, National Association with 15 percent, and Firstbank with 14 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographic data, including housing, business, and economic information for the Denver MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	8.4	24.3	32.4	33.6	1.3
Population by Geography	2,649,187	8.9	24.4	32.7	34.0	0.1
Housing Units by Geography	1,072,923	8.5	23.8	34.2	33.6	0.0
Owner-Occupied Units by Geography	640,084	4.7	18.9	33.9	42.5	0.0
Occupied Rental Units by Geography	379,476	14.3	31.8	34.7	19.1	0.0
Vacant Units by Geography	53,363	11.9	25.8	33.5	28.7	0.0
Businesses by Geography	501,914	6.9	19.0	31.9	41.9	0.3
Farms by Geography	8,758	7.9	19.6	31.1	41.0	0.3
Family Distribution by Income Level	643,475	21.4	17.5	20.4	40.7	0.0
Household Distribution by Income Level	1,019,560	23.5	16.6	18.2	41.8	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$280,726
			Median Gross Rent			\$1,072
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Denver MSA</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)	688	5.4	25.1	35.8	31.0	2.8
Population by Geography	2,905,164	5.2	26.9	34.0	33.0	0.9
Housing Units by Geography	1,124,255	5.1	26.8	35.4	31.5	1.2
Owner-Occupied Units by Geography	690,922	2.9	21.2	36.8	38.6	0.5
Occupied Rental Units by Geography	383,711	9.1	36.5	33.5	18.7	2.3
Vacant Units by Geography	49,622	5.8	29.8	31.8	30.5	2.1
Businesses by Geography	635,047	4.1	21.2	32.7	38.5	3.5
Farms by Geography	10,310	4.5	22.9	35.0	35.8	1.8
Family Distribution by Income Level	670,748	20.2	18.2	21.9	39.7	0.0

Household Distribution by Income Level	1,074,633	22.6	17.1	19.0	41.4	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$103,157	Median Housing Value			\$429,354
			Median Gross Rent			\$1,458
			Families Below Poverty Level			5.4%
<i>Source: 2020 U.S. Census and 2022 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>						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Denver MSA was \$80,820. Based on this information, low-income families earned less than \$40,410 and moderate-income families earned less than \$64,656. The median housing value in the AA is \$280,726. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,010 for a low-income borrower and \$1,616 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,507. Low-income borrowers would be challenged to afford a mortgage loan in the Denver MSA.

Based on 2020 census data, housing affordability challenges persisted for low-income borrowers and arose for moderate-income borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 351.4 and by the fourth quarter of 2022 had increased to 474.7, representing a 35.1 percent increase in home prices across the evaluation period. This acceleration in home prices worsens existing affordability concerns in the MSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Denver MSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 8.1 percent.

### Economic Data

According to Moody's Analytics, dated August 2022, professional and business services, education and health services, and technology (tech) contributed to growth and are important economic drivers of the economy. Job gains propelled the area into expansion in early 2022 but growth has since slowed. Gains made in professional and business services have been offset by losses in transportation/warehousing and government causing labor growth to plateau. The Denver-Aurora-Lakewood, CO MSA is in the top ten percent of being most reliant on tech employment among metropolitan areas nationally. A high educational attainment, an entrepreneurial culture, and a high quality of life should keep tech a pillar of the economy. However, interest rate hikes will cause tech gains to slow over the next year. The Denver International Airport is one of the busiest hubs in the nation and has rebounded in passenger traffic due to strong domestic travel demand. As interest rates climb, house prices are expected to contract by more

than ten percent in the next five years and new-home construction will slow. The largest employers include HealthONE, UC Health: University of Colorado Hospital, Lockheed Martin Corp., and United Airlines.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Denver-Aurora-Lakewood, CO MSA was three percent as of January 2020. In May 2020, unemployment levels peaked at 12.2 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Denver-Aurora-Lakewood, CO MSA was 2.5 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts completed during the evaluation period within the Denver-Aurora-Lakewood, CO MSA to better understand area credit and community needs. One contact worked for an organization focused on affordable housing and community development. The other contact's organization focused on small business development. The contacts cited the following needs:

- Technical assistance to small businesses including how to form sole proprietorships
- Grants to non-profits that support educational enhancement
- Affordable housing
- Down payment assistance for LMI individuals
- Loans and investments in affordable housing projects

## **Scope of Evaluation in Colorado**

The Denver-Aurora-Lakewood (Denver) MSA received a full-scope review because it represents the largest concentration of deposits, lending, and branches in the state of Colorado. The Boulder and Colorado Springs MSAs received limited-scope reviews.

HNB did not originate a sufficient number of loans to small farms in any AA in the state of Colorado to conduct a meaningful analysis.

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

### **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Denver AA was good.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market rank as compared to their deposit market rank.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farms	Community Development	Total	% of State Loans	% of State Deposits
<b>Full-Scope</b>							
Denver MSA	1,322	401	7	7	1,737	76.1	78.5
<b>Limited-Scope</b>							
Boulder MSA	107	33	0	1	141	6.2	2.1
Colorado Springs MSA	360	46	0	2	408	17.8	19.4
<b>Total</b>	1,789	480	7	10	2,286	100.0	100.0
BSRA**				3	3		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*BSRA -Broader Statewide Regional Area.

<b>Dollar Volume of Loans (\$000s)*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farms	Community Development	Total	% of State Loans	% of State Deposits
<b>Full-Scope</b>							
Denver MSA	666,685	47,419	915	18,439	733,458	73.3	78.5
<b>Limited-Scope</b>							
Boulder MSA	67,762	4,127	0	560	72,449	7.2	2.1
Colorado Springs MSA	171,812	5,934	0	17,081	194,827	19.5	19.4
<b>Total</b>	906,259	57,480	915	38,896	1,000,734	100.0	100.0
BSRA**				3,816	3,816		

\*The table present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\* BSRA-Broader Regional Statewide Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 0.6 percent. The bank ranked 20<sup>th</sup> among 67 depository financial institutions placing it in the top 30 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 140<sup>th</sup> among 982 home mortgage lenders in the AA, which placed it in the top 15 percent of lenders. The top three lenders with a combined market share of 15.7 percent were United Wholesale Mortgage with 5.6 percent, American Financing Corporation with 5.5 percent, and Rocket Mortgage with 4.6 percent.

According to peer small business data for 2021, the bank had a market share of 0.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked 59<sup>th</sup> among 283 small business lenders in the AA, which placed it in the top 21 percent of lenders. The top three lenders with a combined market share of 46.1 percent were JPMorgan Chase Bank, National Association with 19.4 percent, American Express National Bank with 13.9 percent, and Wells Fargo Bank, National Association with 12.8 percent.

## Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the Colorado 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

#### ***2020-2021***

The bank's percentage of home mortgage loans in low-income geographies was well below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending in both low- and moderate-income geographies.

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

Refer to Table Q in the Colorado 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

#### ***2020-2021***

The bank's percentage of small business loans in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited a poor distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

In assessing borrower income distribution, consideration was given to the impact of the high cost of housing in the AA. The high cost of housing may impact the ability of low-income and moderate-income borrowers to obtain home mortgage loans.

#### ***2020-2021***

The bank's percentage of home mortgage loans to low-income borrowers was significantly below both the percentage of low-income families and the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending to both low- and moderate-income borrowers.

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

Refer to Table R in the Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

#### ***2020-2021***

The bank did not collect or consider the gross annual revenues in the underwriting of 2.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### Community Development Lending

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made seven CD loans totaling \$18.4 million, which represented 25.8 percent of the allocated tier 1 capital. CD loans primarily supported affordable housing and economic development. By dollar volume, 40.7 percent of these loans funded affordable housing, 30.6 percent funded economic development, and 28.6 percent funded revitalization and stabilization efforts.

Examples of CD loans include:

- The bank originated a \$5.3 million loan to finance the purchase of an industrial building located in a moderate-income census tract. This loan will help to increase new business and jobs in surrounding LMI geographies and an adjacent Opportunity Zone.
- HNB participated in a large construction loan to develop a multi-family housing project that includes commercial and retail space in a low-income census tract in the AA. Of the bank's total \$35.6 million participation, \$3.6 million is allocated to 28 affordable housing units. These housing units will be restricted to households earning between 60 and 80 percent of the area median family income.
- HNB participated in a large and complex revolving credit facility to a LIHTC equity fund. Of the bank's \$40 million participation, \$3.1 million is allocated toward 204 affordable housing units in the Denver MSA AA.

### Product Innovation and Flexibility

HNB makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 46 loans under its flexible lending programs totaling \$3.1 million.

Flexible Lending Product	# of Loans	Dollar Amount (000s)
Conventional Flexible - All Products	6	\$2,351
Debt Manager	27	\$364
Unsecured HI	10	\$161
Lift Local – Small Business	3	\$193
<b>Total</b>	46	\$3,069

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Colorado Springs MSA is consistent with the rating in the full scope review area. The bank's performance in the Boulder MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance in the Boulder MSA was due to a weaker borrower distribution. Weaker performance in the limited-scope AA did not negatively impact the overall Lending Test rating for the state of Colorado.

Refer to Tables O through T in the state of Colorado section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Colorado is rated High Satisfactory. Weaker performance in the limited-scope AAs negatively impacted the overall state Investment Test rating.

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

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

### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments, grants, and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Denver MSA	3	2,107	31	4,966	34	81.0	7,073	99.5	1	60
<b>Limited-Scope</b>										
Boulder MSA	0	0	6	25	6	14.3	25	0.4	0	0
Colorado Springs MSA	0	0	2	8	2	4.7	8	0.1	0	0
<b>Total</b>	3	2,107	39	4,999	42	100	7,106	100	1	60

\* 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.

The bank made current period investments totaling \$7.1 million during the evaluation period, which includes 28 qualifying grants and donations totaling \$191,000 to 19 organizations. The dollar volume of current- and prior- period investments represented 9.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97.3 percent of investments supported affordable housing and 2.7 percent funded community services to LMI individuals. The institution rarely uses innovative and/or



complex investments to support CD initiatives. The bank made three current period LIHTC fund investments totaling \$4.8 million.

Examples of CD investments in the AA include:

- The bank made an investment in a LIHTC fund, which included a \$1.5 million LIHTC project in Adams County, CO. The developer will provide senior veteran-specific services at the 59-unit complex, including on-site coordinated access to medical care and transportation services.
- The bank made a \$500,000 investment in a LIHTC in Denver, CO. The project will consist of 14 one-bedroom, 28 two-bedroom and 19 three-bedroom units available to low-income households earning between 20 to 80 percent of the area median income. The project will offer support to its residents in key areas, ranging from job training, legal services, mental healthcare and counseling, early childhood education, life skills training, and leadership development.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Boulder MSA and Colorado Springs MSA AAs was weaker than the bank's overall performance under the Investment test in the full-scope area due to very poor levels of qualified investments. The institution's performance under the Investment Test in the combined limited-scope areas had a negative impact on the overall Investment Test rating for the state of Colorado.

## SERVICE TEST

The bank's performance under the Service Test in Colorado is rated Outstanding. Performance in the limited-scope areas had minimal impact on the overall state Service Test rating.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver MSA was excellent.

## Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full-Scope</b>													
Denver MSA	78.5	24	72.7	4.2	20.8	54.2	20.8	0	5.2	26.9	34.0	33.0	0
<b>Limited-Scope</b>													
Boulder MSA	2.1	1	3.0	0	0	100	0	0	4.6	16.0	43.2	33.4	0

Colorado Springs MSA	19.4	8	24.2	0	25.0	37.5	37.5	0	1.9	25.2	39.1	33.2	0
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The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100 percent due to rounding.

HNB's distribution of branches in both LMI geographies was near to the percentage of the population living within those geographies. The OCC gave positive consideration for six branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this PE. This had a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 32 ATMs in the AA, all of which were deposit-taking. HNB provided data that indicated 81.3 percent of customers in LMI geographies used the bank's mobile application or accessed online banking during the fourth quarter of 2022. Because HNB acquired these branches and customers during the evaluation period, data from the first quarter of 2020 is unavailable.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full-Scope</b>							
Denver MSA	0	0	0	0	0	0	0
<b>Limited-Scope</b>							
Boulder MSA	0	0	0	0	0	0	0
Colorado Springs MSA	0	0	0	0	0	0	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 24 branches in the Denver MSA. Of these, 23 were traditional branches and one was a limited-purpose commercial branch. The traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with 10 branches, including four located in moderate-income geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 21 of the traditional branches, including all branches in LMI geographies, and maintained the same hours as the branch. The single commercial branch operated from 8:00 a.m. to 5:00 p.m., Monday through Friday.

## Community Development Services

The institution is a leader in providing CD services.

HNB employees provided 164 qualified CD service activities to 20 organizations with 475 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 36 of these activities with five bank employees providing 92 service hours to five organizations. The

bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 145 service activities and 353 service hours.

Service activity examples during the evaluation period include:

- A senior HNB employee served on the board of directors and two other committees, for a CDC that promotes economic development for underserved populations in Colorado by increasing home ownership and affordable rental opportunities, nurturing small businesses by developing needed shopping areas and services, and by fostering job retention and creation. This employee provided 36 hours of service across the evaluation period.
- Three HNB employees served on the board of directors and three other committees, for a non-profit organization that educates, trains, and supports youth and adults on their path to success in education, employment, and business ownership. A majority of the clients served by the organization are LMI. The HNB employees provided a total of 95 hours of service across the evaluation period.
- Seven HNB employees, including a regional president, volunteered with a local housing authority to provide financial literacy education to LMI clients of the non-profit organization. The housing authority's mission is to develop and provide high-quality, affordable housing with responsive services, enabling people and communities to thrive. The HNB employees provided a total of 13 hours of service across the evaluation period.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Boulder and Colorado Springs MSAs is weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance was due to less, but still reasonably, accessible service delivery systems in LMI geographies. Performance in the limited-scope areas had minimal impact on the state Service Test rating.

## State of Florida

**CRA rating for the state of Florida<sup>5</sup>: Satisfactory**

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

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good and borrower distribution of lending was adequate.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels, and the institution provides an adequate level of CD services, when considering the scope of operations within the state.

## Description of Institution's Operations in Florida

HNB delineated one AA within Florida. This AA consisted of the Naples, FL MSA. Florida was HNB's second smallest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$50.1 million in deposits in Florida representing less than 0.1 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated one branch and one ATM. The ATM was deposit-taking within the rating area, representing 0.1 percent of total bank branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$242.8 million in loans. This included \$209.6 million in home mortgages and \$15.8 million in small business loans within Florida representing 0.4 percent of total bank loan and origination purchases.

### Naples MSA AA

HNB had \$50.1 million in deposits in the Naples MSA AA, representing less than 0.1 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated one branch and one ATM, which was deposit taking, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$242.8 million in loans within the Naples MSA, including \$209.6 million in home mortgages and \$15.8 million in small business loans representing 0.4 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 34 FDIC-insured institutions were operating 131 branches in the AA. HNB ranked 27<sup>th</sup> in deposit share, with 0.2 percent. The top three banks by deposit market share

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<sup>55</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

were Bank of America, National Association with 13.7 percent, Fifth Third Bank, National Association with 12.6 percent, and Wells Fargo Bank, National Association with 10.6 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Naples MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Naples MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	8.1	20.3	35.1	35.1	1.4
Population by Geography	341,091	7.2	23.5	38.0	31.3	0.0
Housing Units by Geography	201,582	3.6	18.3	38.0	40.0	0.0
Owner-Occupied Units by Geography	93,733	2.3	16.3	41.3	40.1	0.0
Occupied Rental Units by Geography	36,155	9.5	28.3	37.8	24.5	0.0
Vacant Units by Geography	71,694	2.4	15.9	33.8	47.8	0.0
Businesses by Geography	81,803	2.8	14.3	37.9	45.1	0.0
Farms by Geography	1,969	5.6	21.3	42.9	30.2	0.0
Family Distribution by Income Level	87,665	20.8	17.7	19.3	42.2	0.0
Household Distribution by Income Level	129,888	22.3	17.1	18.4	42.2	0.0
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA		\$66,264	Median Housing Value			\$347,465
			Median Gross Rent			\$1,087
			Families Below Poverty Level			9.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Naples MSA</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)	109	7.3	19.3	40.4	30.3	2.8
Population by Geography	375,752	7.1	21.8	40.2	29.8	1.2
Housing Units by Geography	218,348	3.8	16.3	41.5	37.3	1.2
Owner-Occupied Units by Geography	110,083	2.3	17.4	40.7	38.4	1.2
Occupied Rental Units by Geography	37,894	12.2	23.9	42.1	21.1	0.8
Vacant Units by Geography	70,371	1.6	10.5	42.3	44.2	1.3
Businesses by Geography	94,608	2.6	15.3	41.9	39.2	1.1
Farms by Geography	2,153	7.7	26.3	41.6	23.8	0.7
Family Distribution by Income Level	98,121	21.9	18.0	19.6	40.5	0.0
Household Distribution by Income Level	147,977	23.7	16.8	16.9	42.5	0.0

Median Family Income MSA - 34940 Naples-Marco Island, FL MSA	\$84,784	Median Housing Value	\$472,689
		Median Gross Rent	\$1,368
		Families Below Poverty Level	7.1%
<i>Source: 2020 U.S. Census and 2022 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>			

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Naples MSA was \$66,264. Based on this information low-income families earned less than \$33,132 and moderate-income families earned less than \$53,011. The median housing value in the AA is \$347,465. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$828 for a low-income borrower and \$1,325 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,865. Low- and moderate-income borrowers would be challenged to afford a mortgage loan in the Naples MSA.

Based on 2020 census data, housing affordability challenges persisted.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 324.9 and by the fourth quarter of 2022 had increased to 526.3, representing a 62 percent increase in home prices across the evaluation period. This acceleration in home prices worsens existing affordability concerns in the MSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Naples MSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 7.1 percent.

### Economic Data

According to Moody's Analytics, dated August 2022, leisure and hospitality services, tourism, health services, and retail trade were all contributors to growth and important economic drivers of the economy. Leisure and hospitality led job gains along with health services and construction. Travel-related industries continue to be important to the economy, and the increase in the number of visitors from the demand for vacations has helped these industries. Housing demand in the AA increased significantly from in-migration and the availability of remote work opportunities. Increased demand while paired with limited housing supply resulted in increased prices in the market. Healthcare employment is about average, but the expanding retiree community, as well as the fact that a third of the population in the area is over 65 years old, will support healthcare demand. The largest employers are Naples Community Hospital Inc., Publix Super Markets Inc., Arthrex Inc. & Manufacturing, and Walmart Inc.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Naples-Marco Island, FL MSA was three percent as of January 2020. In April 2020, unemployment levels peaked at 13.1 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Naples-Marco Island, FL MSA was 2.3 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact completed during the evaluation period within the Naples-Marco Island, FL MSA to better understand area credit and community needs. The contact's organization focused its efforts on affordable housing and homebuyer education. The contact described how recent hurricanes have impacted the area making it difficult to find affordable housing for local individuals and how increased homelessness is inevitable. The contact cited the following needs:

- Unrestricted financial contributions for organizations, such as grants or donations
- Technical assistance for affordable housing development
- Financing for affordable housing development
- Bridge financing for affordable housing projects, mixed-use residential developments, and retail development
- Loans with flexible terms
- Financial education and homebuyer counseling to LMI individuals
- Banking services in underbanked areas of the MSA, potentially through alternative delivery services

### **Scope of Evaluation in the State of Florida**

The Naples MSA AA received a full-scope review. The Naples MSA AA was the only AA within the state of Florida rating area.

HNB did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

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

### **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Naples MSA AA was good.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market rank as compared to their deposit market rank.

<b>Number of Loans</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full-Scope</b>							
Naples MSA	311	115	2	7	435	100.0	100.0
<b>Total</b>	311	115	2	7	435	100.0	100.0
BSRA*				32	32		

\*BSRA- Broader Statewide Regional Area.

<b>Dollar Volume of Loans (\$000s)*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farms	Community Development	Total	% of State Loans	% of State Deposits
<b>Full-Scope</b>							
Naples MSA	209,555	15,774	345	17,100	242,774	100.0	100.0
<b>Total</b>	209,555	15,774	345	17,100	242,774	100.0	100.0
BSRA*				290,272	290,272		

\*BSRA- Broader Statewide Regional Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 0.2 percent. The bank ranked 27<sup>th</sup> among 34 depository financial institutions placing it in the top 80 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.4 percent based on the number of home mortgage loans originated or purchased, compared to a 0.2 percent deposit market share. The bank ranked 51<sup>st</sup> among 1,048 home mortgage lenders in the AA, which placed it in the top 4.86 percent of lenders. The top three lenders with a combined market share of 15.6 percent were Rocket Mortgage (5.7 percent), Crosscountry Mortgage, LLC (5.6 percent), and Wells Fargo Bank, National Association (4.3 percent).

According to peer small business data for 2021, the bank had a market share of 0.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked 35<sup>th</sup> among 195 small business lenders in the AA, which placed it in the top 17.9 percent of lenders. The top three lenders with a combined market share of 44.0 percent were American Express National Bank (20.7 percent), JPMorgan Chase Bank, National Association (12.1 percent), and Bank of America, National Association (11.3 percent).

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

The bank exhibited a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the Florida 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.



2020-2021

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans.

2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending in low-income and moderate-income geographies.

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

Refer to Table Q in the Florida 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

2020-2021

The bank's percentage of small business loans in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies approximated the percentage of businesses in those geographies and exceeded the aggregate distribution of loans.

2022

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to worse distribution of lending in both low- and moderate-income geographies.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited an adequate geographic distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

In assessing borrower income distribution, consideration was given to the impact of the high cost of housing in the AA. The high cost of housing may impact the ability of low-income and moderate-income borrowers to obtain home mortgage loans.

#### *2020-2021*

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of loans.

#### *2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending to moderate-income borrowers.

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

Refer to Table R in the Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

#### *2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 6.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

#### *2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### **Community Development Lending**

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made seven CD loans totaling \$17.1 million, which represented 331.2 percent of the allocated tier 1 capital. CD loans primarily supported affordable housing and economic development. By dollar volume, 12.6 percent of these loans funded affordable housing and 87.4 percent funded economic development.

Examples of CD loans include:

- HNB made a \$3.1 million SBA 7(a) loan to assist in the acquisition of a well-established local restaurant. The restaurant employs approximately 70 individuals during both the in-season and off season. The loan helped retain jobs in the MSA.
- HNB participated in a revolving line of credit as part of LIHTC equity investments benefiting numerous affordable housing projects throughout multiple states. Of the bank's total revolving line of credit, \$2.1 million was allocated to 634 affordable housing units in the Naples MSA AA. This loan is responsive to the identified need for affordable housing.

### *Broader Statewide and Regional Lending*

HNB originated an additional 32 CD loans totaling \$290 million in the broader statewide regional area (BSRA) which did not have a purpose mandate or function to serve the bank's AA. HNB has been responsive to community development needs in the AA. Positive consideration was given to these CD loans within the BSRA.

### **Product Innovation and Flexibility**

HNB makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in Florida is rated Outstanding.

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

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

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investments, donations, and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Naples MSA	0	0	3	\$10,168	3	100	\$10,168	100	0	0
<b>Total</b>	0	0	3	\$10,168	3	100	\$10,168	100	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.

The bank made current period investments totaling \$10.2 million during the evaluation period, which includes two qualifying grants and donations totaling \$60,000 to one organization. The dollar volume of current-period investments represented 196.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 99.4 percent of investments supported affordable housing, and 0.6 percent supported community services targeted to LMI individuals. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$10.1 million in a single investor LIHTC fund. The project, which is currently being built in Naples, Florida, will include 82 affordable homes, a community building, a business center, and other common area amenities. Residents will have access to services, which will include educational opportunities and health and wellness programs.
- The bank donated \$60,000 to an organization that is a non-profit formed to equip and prepare students for their future learning and career goals. The organization gives students the opportunity to gain life skills needed in an ever more competitive world, helps parents support their children's studies, encourages teachers and principals to develop and share best practices, and strengthens and builds community networks that inspire innovation.

## SERVICE TEST

The bank's performance under the Service Test in Florida is rated Low Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Naples MSA was adequate when considering the bank's limited presence and operations in the state that exist only to serve private banking clients.

## Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA when considering the bank's business strategy in Florida.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA

<b>Full-Scope</b>													
Naples MSA	100%	1	100%	0	0	0	100	0	7.1	21.8	40.2	29.8	0

*The NA category consists of geographies that have not been assigned an income classification.  
Totals may not equal 100.0 percent due to rounding.*

The bank operated one limited-service branch that was not open to the public and a single deposit taking ATM at that branch.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full-Scope							
Naples MSA	0	0	0	0	0	0	0

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals.

The bank operated one limited-service, private banking branch in the Naples MSA. This branch operated from 9:00 a.m. to 4:00 p.m., Monday through Friday, by appointment only.

## Community Development Services

The institution provides an adequate level of CD services.

HNB employees provided 10 qualified CD service activities to one organization with 31.5 qualified hours within this AA during the evaluation period. One HNB employee served on the board of directors for a non-profit organization that seeks to prepare LMI students for the future learning and career goals.

## State of Indiana

**CRA rating for the state of Indiana<sup>6</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good and borrower distribution of lending was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems are accessible to geographies and individuals of different income levels, and the institution provides a relatively high level of CD services.

## Description of Institution's Operations in Indiana

HNB delineated two AAs within Indiana. These AAs consisted of the Indianapolis MSA and the Lafayette MSA. Indiana was HNB's fifth largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$5.5 billion in deposits in Indiana representing 3.7 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 39 branches and 58 ATMs, of which 53 were deposit-taking, within the rating area, representing 3.6 percent of total bank branches and 2.9 percent of total ATMs. The bank originated and purchased approximately \$3.1 billion in home mortgage and \$467.8 million in small business loans within Indiana representing 5.6 percent of total bank loan originations and purchases.

### Indianapolis MSA

HNB had \$5.3 billion in deposits in the Indianapolis MSA, representing 3.6 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 37 branches and 56 ATMs, of which 51 were deposit taking, representing 3.4 percent of total branches and 2.8 percent of total ATMs. The bank originated and purchased approximately \$3.4 billion in home mortgage and small business loans within the Indianapolis MSA, representing 5.4 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 39 FDIC-insured institutions operated 429 branches in the AA. HNB ranked fifth in deposit share, with 7.1 percent. The top three banks by deposit market share were JPMorgan Chase Bank, National Association with 23

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<sup>66</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

percent, PNC Bank, National Association with 14.6 percent, and Merchants Bank of Indiana with 8.6 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Indianapolis AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	353	18.4	28.0	29.5	23.5	0.6
Population by Geography	1,712,841	11.9	23.9	30.3	33.5	0.3
Housing Units by Geography	732,082	13.7	26.1	29.4	30.7	0.2
Owner-Occupied Units by Geography	416,489	6.9	18.4	34.3	40.3	0.1
Occupied Rental Units by Geography	237,442	20.6	36.9	23.7	18.6	0.3
Vacant Units by Geography	78,151	28.9	34.0	20.9	15.7	0.4
Businesses by Geography	211,436	11.5	21.2	29.0	38.1	0.2
Farms by Geography	5,273	7.3	15.4	41.8	35.4	0.1
Family Distribution by Income Level	420,081	22.4	17.2	19.1	41.3	0.0
Household Distribution by Income Level	653,931	24.2	16.4	17.6	41.8	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$144,103
			Median Gross Rent			\$832
			Families Below Poverty Level			11.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Indianapolis MSA</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)	419	13.8	25.1	33.7	25.3	2.1
Population by Geography	1,862,164	9.3	22.1	35.4	31.7	1.5
Housing Units by Geography	765,567	11.0	23.5	35.2	28.8	1.5
Owner-Occupied Units by Geography	445,590	5.5	17.3	39.0	37.3	1.0
Occupied Rental Units by Geography	250,448	17.6	32.0	30.6	17.7	2.1
Vacant Units by Geography	69,529	22.8	32.3	27.8	15.1	2.0
Businesses by Geography	257,593	8.8	20.1	33.3	34.5	3.2
Farms by Geography	6,027	6.6	16.9	43.6	31.6	1.3
Family Distribution by Income Level	437,647	21.1	17.6	20.3	41.0	0.0
Household Distribution by Income Level	696,038	23.7	16.5	18.3	41.5	0.0

Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA	\$80,981	Median Housing Value	\$180,444
		Median Gross Rent	\$966
		Families Below Poverty Level	8.2%
<i>Source: 2020 U.S. Census and 2022 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>			

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Indianapolis MSA was \$66,803. Based on this information, low-income families earned less than \$33,402 and moderate-income families earned less than \$53,442. The median housing value in the AA is \$144,103. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$835 for a low-income borrower and \$1,336 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$774. Housing is generally affordable for low- and moderate-income borrowers in the Indianapolis MSA.

Based on 2020 census data, housing remained generally affordable for low- and moderate-income borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 193.6 and by the fourth quarter of 2022 had increased to 271.8, representing a 40.4 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for low- and moderate-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Indianapolis MSA, the percentage of families living below the poverty level was 11.1 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, professional and business services, manufacturing, and government contributed to growth and are important economic drivers of the economy. Indianapolis continues to outperform in the Midwest as the overall labor force has surpassed pre-pandemic levels, ahead of most of the country. The region's solid logistical infrastructure and central location have allowed the area to recover quicker than other areas. Manufacturing has regained ground lost from pre-pandemic levels with pharmaceuticals playing a key role in payroll growth. Gains are expected from a new chip plant as well as a \$2 billion investment in new manufacturing sites from a top area employer, Eli Lilly and Co., with a projected creation of 500 jobs. However, labor shortages in construction continue to affect the construction industry with workers on the decline since the beginning of 2022. Population growth has outpaced its Midwest peers, leading to a large labor pool and opportunities for



businesses to expand. The largest employers include Indiana University Health, St. Vincent Hospitals and Health Services, Community Health Network, and Eli Lilly and Co.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Indianapolis-Carmel-Andersen, IN MSA was 3.3 percent as of January 2020. In April 2020, unemployment levels peaked at 12.7 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Indianapolis-Carmel-Andersen, IN MSA was 2.3 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact completed during the evaluation period within the Indianapolis-Carmel-Anderson, IN MSA to better understand area credit and community needs. The contact's organization focused its efforts on growth and sustainability of small businesses in the state. The contact addressed employment returning to pre-pandemic levels, but unemployment benefits, stimulus checks, and tax return refunds have slowed individuals from returning to work. The contact identified Huntington as one of four banks in the market that is proactive and willing to make small business loans. The contact cited the following needs:

- Working capital for small businesses
- Long-term financing for small businesses
- In-person technical assistance trainings for small businesses
- Affordable housing due to limited volume of housing inventory
- Housing development due to limited housing inventory

## **Scope of Evaluation in Indiana**

The Indianapolis MSA AA received a full-scope review because it represented the largest concentration of deposits, lending, and branches in the state of Indiana. The Lafayette MSA AA received a limited-scope review.

The bank did not originate a sufficient volume of small loans to farms in the Indianapolis MSA in the 2022 analysis period and did not originate a sufficient volume of small loans to farms in the Lafayette MSA AA in either analysis period, to conduct a meaningful analysis.

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

### **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA was excellent.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full Scope</b>							
Indianapolis MSA	13,697	5,233	98	138	19,166	95.3	96.7
<b>Limited Scope</b>							
Lafayette MSA	733	201	7	4	945	4.70	3.3
<b>Total</b>	14,430	5,434	105	142	20,111	100.0	100.0
<b>BSRA**</b>				37	37		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*BSRA-Broader Statewide Regional Area.

<b>Dollar Volume of Loans* (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
<b>Full Scope</b>							
Indianapolis MSA	2,980,144	454,662	7,122	170,657	3,612,585	96.6	96.7
<b>Limited Scope</b>							
Lafayette MSA	108,487	13,124	425	3,079	125,115	3.4	3.3
<b>Total</b>	3,088,631	467,786	7,547	173,736	3,737,700	100.0	100.0
<b>BSRA**</b>				76,010	76,010		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas

\*\*BSRA-Broader Statewide Regional Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 7.1 percent. The bank ranked fifth among 39 depository financial institutions placing it in the top 13 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 3.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 721 home mortgage lenders in the AA, which placed it in the top one percent of lenders. The top three lenders with a combined market share of 13.8 percent were Caliber Home Mortgage Loans, Inc. with 5.1 percent, Rocket Mortgage with 4.8 percent, and HNB with 3.9 percent.

According to peer small business data for 2021, the bank had a market share of 4.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth among 191 small business lenders in the AA, which placed it in the top two percent of lenders. The top three lenders with a combined market share of 38 percent were JPMorgan Chase Bank, National Association with 18.5 percent, American Express National Bank with 14.5 percent, and Capital One Bank with five percent.

According to peer small farm data for 2021, the bank had a market share of 3.2 percent based on the number of small loans to farms originated or purchased. The bank ranked 11<sup>th</sup> among 35 small farm lenders in the AA, which placed it in the top 32 percent of lenders. The top three lenders with a combined market share of 41.2 percent were John Deere Financial with 15.8 percent, JPMorgan Chase Bank, National Association with 13.2 percent, and First Farmers Bank & Trust with 12.2 percent.

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

The bank exhibited a good geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the Indiana 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

#### ***2020-2021***

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the Indiana 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

#### ***2020-2021***

The bank's percentage of small business loans in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies was below the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with performance in 2020-2021.

### ***Small Farm Loans***

Refer to Table S in the Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small farm loans was adequate.

2020-2021

The bank's percentage of small farm loans in low-income geographies was significantly below the percentage of farms in those geographies but exceeded the aggregate distribution of loans. The percentage of small farm loans in moderate-income geographies was significantly below the percentage of small farms in those geographies and was well below the aggregate distribution of loans.

2022

The bank did not originate a significant number of small farm loans to conduct a meaningful analysis.

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

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. The OCC did not identify any conspicuous or unexplained gaps in originations and purchases throughout the AA.

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

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

2020-2021

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution of lending to low-income borrowers.

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

Refer to Table R in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

*2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 10.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Farm Loans***

Refer to Table T in the Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small farm loans was good.

*2020-2021*

The bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of small farms in the AA but exceeded the aggregate distribution of all reporting lenders.

*2022*

The bank did not originate a sufficient number of small loans to farms to conduct a meaningful analysis.

**Community Development Lending**

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 138 CD loans totaling \$170.7 million, which represented 31.1 percent of the allocated tier 1 capital. CD loans primarily supported economic development efforts and community development services for LMI individuals. By dollar volume, 13.1 percent of these loans funded affordable housing, 47.5 percent funded economic development, 22.5 percent funded revitalization and stabilization efforts, and 16.9 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$10.5 million loan to support the construction of a 60-unit affordable housing project consisting of 30 units restricted for households earning up to 80 percent of the area median income, 15 units for households earning up to 30 percent of area median income, and 15 units

restricted for households earning 50 percent of area median income. This loan is responsive to the identified AA need of affordable housing.

- The bank originated a \$5.2 million construction loan to finance a LIHTC for a 30-unit, Permanent Supportive Housing apartment project located in Indianapolis, IN. The project will provide quality affordable housing to individuals between the ages of 18 through 24 who are experiencing homelessness or are at risk of homelessness. The housing will be for individuals earning between 30 to 60 percent of area median income. This loan is responsive to the identified AA need of affordable housing.

## Product Innovation and Flexibility

HNB makes use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 881 loans under its flexible lending programs totaling \$86.6 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

Flexible Lending Product	# of Loans	Dollar Amount (000s)
Conventional Flexible - All Products	406	\$69,603
Debt Manager	200	\$3,439
MI HDA - 30 Year Fixed - Conv	25	\$3,289
MI HDA - 30 Year Fixed - FHA	1	\$162
Port - 30 Year Fixed - CAM CRA	3	\$373
Port – 30 Year Fixed - Hometown Mortgage	24	\$2,854
Unsecured HI	162	\$2,714
Lift Local – Small Business	60	\$4,185
<b>Total</b>	<b>881</b>	<b>\$86,619</b>

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Lafayette AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Indiana is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

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

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Indianapolis MSA	25	6,636	192	69,541	217	89.3	76,177	67.3	17	20,377
<b>Limited-Scope</b>										
Lafayette MSA	0	0	26	37,039	26	10.7	37,039	32.7	0	0
<b>Total</b>	<b>25</b>	<b>6,636</b>	<b>218</b>	<b>106,580</b>	<b>243</b>	<b>100.0</b>	<b>113,216</b>	<b>100.0</b>	<b>17</b>	<b>20,377</b>

\* '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.

The bank made 192 investments totaling \$69.5 million during the evaluation period, which includes donations totaling \$930,000 to 66 organizations, supporting community services to low- and moderate-income individuals. The dollar volume of current- and prior- period investments totaled \$76.2 million and represented 13.9 percent of allocated tier 1 capital to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives. The bank made two single investor LIHTC project investments for \$19.7 million and invested in five LIHTC syndications totaling \$26.6 million.

Examples of CD investments in the AA include:

- The bank made an investment totaling \$11.5 million to fund a construction project for 60 residential units in a three-story multifamily building for individuals with incomes up to 80 percent of area median income.
- HNB purchased a \$20.2 million tax exempt bond to finance renovation of, and improvements to, school facilities in multiple school districts where the majority of students receive free or reduced lunch.
- HNB provided \$65 thousand in donations to a non-profit in Indianapolis that assists the homeless population. Donations supported the organization's ability to provide food, shelter, and recovery programs for the homeless.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Lafayette AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

## SERVICE TEST

The bank's performance under the Service Test in Indiana is rated High Satisfactory. Performance in the limited-scope AAs had minimal impact on the overall state conclusion.

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

Based on a full-scope review, the bank's performance in the Indianapolis MSA was good.

### Retail Banking Services

Service delivery systems are accessible to significant portions of geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full Scope</b>													
Indianapolis MSA	96.7	37	94.9	2.7	18.9	48.6	29.7	0	9.3	22.1	35.4	31.7	0
<b>Limited Scope</b>													
Lafayette MSA	3.3	2	5.1	0	50	50	0	0	6.2	16.9	40.0	27.4	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100 percent due to rounding.

HNB's distribution of branches in low-income geographies was well below, and in moderate-income geographies was near to, the percentage of the population living within those geographies. The OCC gave positive consideration for six branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, two were located within 1,000 feet of a low- or moderate-income geography, and the remaining four serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this PE. This had a positive impact on the service test conclusion.

HNB offered several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 56 ATMs in the AA, 51 of which were deposit-taking. HNB provided data that indicated 83.3 percent of customers in LMI geographies used the bank's mobile application or accessed online banking during the fourth quarter of 2022. This was an increase of 41.9 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery systems conclusion.



<b>Distribution of Branch Openings/Closings</b>							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full Scope</b>							
Indianapolis MSA	1	5	0	-1	-1	-2	0
<b>Limited Scope</b>							
Lafayette MSA	0	0	0	0	0	0	0

To the extent changes were made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed five branches, one of which was in a moderate-income geography. The branch closures were a result of branch consolidation due to proximity and low usage. HNB was forced to sell one branch, located in a moderate-income geography, by the city of Indianapolis to allow for the expansion of the local police headquarters. HNB also opened one branch during the evaluation period, which was located in a middle-income geography.

Services, including business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals.

HNB operated 37 branches in the Indianapolis MSA. Of these, 35 were traditional branches, one was a remote drive-thru branch, and one was a Smart Branch. All traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with 30 branches, including branches in LMI geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 31 of the traditional branches, including all branches in LMI geographies, and maintained the same hours as the branch. The remote drive-thru branch operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, and the Smart Branch operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, and 9:00 a.m. to 12:00 p.m. on Saturdays.

## Community Development Services

The institution provides a relatively high level of CD services.

HNB employees provided 306 qualified CD service activities to 31 organizations with 1,495 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in 60 of these activities with bank employees providing 554 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with community services targeted to LMI individuals, which represented 288 service activities and 1,455 service hours.

- One HNB employee served on the board of directors and various committees for a social services agency, which provides programs and services that include child abuse prevention, home-based services, youth placement, and recovery services. Service totaled more than 200 hours across the evaluation period.

- Multiple HNB employees participated on an organization's loan review committee and various committees and developed a financial education and small business development webinar for small businesses impacted by the COVID-19 Pandemic. This organization assists in creating economic prosperity for underserved entrepreneurs by providing capital, financial education, and resources to build healthy small businesses. Service totaled more than 78 hours across the evaluation period.
- Multiple HNB employees served on the board of directors for an economic development organization. This organization supports entrepreneurs and small business owners in central Indiana, providing free one-on-one business coaching in Spanish and English, access to capital, as well as connections to resources through experienced business advisors. Service totaled more than 16 hours across the evaluation period.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Lafayette AA is stronger than the bank's overall performance under the Service Test in the full-scope area. Stronger performance was due to more readily accessible service delivery systems in low-income geographies. Performance in the limited-scope AA had minimal impact on the overall state conclusion.

## State of Michigan

**CRA rating for the state of Michigan<sup>7</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good and borrower distribution of lending was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems are readily accessible to geographies and individuals of different income levels, and the institution provides a relatively high level of CD services.

## Description of Institution's Operations in Michigan

HNB delineated 16 AAs within Michigan. The OCC combined all non-MSA counties to form the Michigan Combined Non-MSA AA. Michigan was HNB's second largest rating area based on deposits. HNB's largest AAs in Michigan include the Detroit MSA, the Grand Rapids MSA, the Flint MSA, the Ann Arbor MSA, and the Michigan Combined Non-MSA AA. Refer to appendix A for the list of counties reviewed.

HNB had \$38.0 billion in deposits in Michigan representing 25.6 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 324 branches and 406 ATMs, of which 374 were deposit-taking, within the rating area, representing 30.1 percent of total bank branches and 20.6 percent of total ATMs. The bank originated and purchased approximately \$9.3 billion in home mortgage and \$2.9 billion in small business loans within Michigan, representing 20.5 percent of total bank loan originations and purchases.

### Detroit MSA

HNB had \$17.4 billion in deposits in the Detroit MSA, representing 11.7 percent of the bank's total deposits as of June 30, 2022. The Detroit MSA consists of the Detroit-Dearborn-Livonia, MI MD and the Warren-Troy-Farmington Hills, MI MD. As of December 31, 2022, the bank operated 110 branches and 152 ATMs, of which 137 were deposit taking, representing 10.2 percent of total branches and 7.7 percent of total ATMs. The bank originated and purchased approximately \$6.1 billion in home mortgage and small business loans within the Detroit MSA, representing 9.1 percent of total bank loan

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<sup>77</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 38 FDIC-insured institutions operated 801 branches in the AA. HNB ranked fourth in deposit share, with 8.7 percent. The top three banks by deposit market share were JPMorgan Chase Bank, National Association with 31.4 percent, Comerica Bank with 17 percent, and Bank of America, National Association with 15.5 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographic data, including housing, business, and economic information, for the Detroit MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Detroit MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,301	13.5	25.7	31.5	27.4	1.9
Population by Geography	4,296,416	10.2	24.1	33.8	31.6	0.2
Housing Units by Geography	1,891,400	12.0	25.7	33.2	28.8	0.3
Owner-Occupied Units by Geography	1,148,793	6.1	20.4	37.0	36.5	0.1
Occupied Rental Units by Geography	514,155	18.8	33.0	29.6	18.1	0.5
Vacant Units by Geography	228,452	26.4	36.3	22.2	14.0	1.1
Businesses by Geography	364,866	8.0	21.2	30.6	39.7	0.5
Farms by Geography	8,067	5.2	19.4	42.6	32.6	0.3
Family Distribution by Income Level	1,081,123	22.9	16.7	18.9	41.4	0.0
Household Distribution by Income Level	1,662,948	25.2	15.6	17.0	42.2	0.0
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Housing Value			\$129,261
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$76,739	Median Gross Rent			\$863
			Families Below Poverty Level			12.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Detroit MSA</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)	1,356	9.4	26.0	29.9	28.4	6.3
Population by Geography	4,392,041	7.8	25.6	32.8	32.9	0.8
Housing Units by Geography	1,910,964	9.1	27.1	32.3	30.4	1.1
Owner-Occupied Units by Geography	1,199,097	4.5	22.1	35.1	37.9	0.5
Occupied Rental Units by Geography	527,304	16.0	34.6	29.4	18.2	1.8
Vacant Units by Geography	184,563	19.7	38.1	22.4	16.5	3.4
Businesses by Geography	375,619	6.6	21.3	30.5	39.4	2.3
Farms by Geography	8,265	4.3	21.0	40.7	33.1	0.9

Family Distribution by Income Level	1,083,437	21.9	17.2	20.0	41.0	0.0
Household Distribution by Income Level	1,726,401	24.8	15.8	17.2	42.2	0.0
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$63,896	Median Housing Value			\$180,427
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$92,419	Median Gross Rent			\$982
			Families Below Poverty Level			9.8%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Detroit MSA was \$52,733 to \$76,739. Based on this information, low-income families earned less than \$26,367 to \$38,370 and moderate-income families earned less than \$42,186 to \$61,391. The median housing value in the AA is \$129,261. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$659 to \$959 for a low-income borrower and \$1,055 to \$1,535 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$694. Some low-income borrowers would be challenged to afford a mortgage loan in the Detroit MSA while housing was generally affordable for moderate-income borrowers in the Detroit MSA.

Based on 2020 census data, housing affordability challenges persisted for low-income borrowers while housing remained generally affordable for moderate-income borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 185.4 and by the fourth quarter of 2022 had increased to 242.7, representing a 30.9 percent increase in home prices across the evaluation period. This acceleration in home prices worsens existing affordability concerns for LMI borrowers in the MSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Detroit MSA, the percentage of families living below the poverty level was 12.7 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, professional and business services, education and health services, and manufacturing contributed to growth and are important economic drivers of the economy. The economic recovery continues to be challenged as the majority of these industries have not added jobs. Manufacturing accounts for a large part of the employment in the area, making it vulnerable to supply-chain shortages. Supply-chain bottlenecks are expected to improve, providing a boost to the

auto-manufacturing industry, which is a critical industry in this area. The Detroit-Warren-Dearborn, MI MSA will increase capacity for electric vehicle production, and Ford will invest two billion dollars to the cause, creating an estimated 3,000 jobs. Healthcare is another crucial source of employment because of the large 65 years and older population, but staffing challenges persist as nurses and other healthcare workers are quitting at record high rates. Migration out of the area has also been a continued challenge for the Detroit-Warren-Dearborn MI MSA, as the population has decreased by 0.9 percent from mid-2020 to mid-2021. Migration out of the area will shrink the hiring pool, tighten local government budgets, and weigh on demand for services and housing. The largest employers include General Motors Corp., Ford Motor Co., the University of Michigan, and Chrysler Group LLC.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Detroit-Warren-Dearborn, MI MSA was 4.3 percent as of January 2020. In May 2020, unemployment levels peaked at 23.9 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Detroit-Warren-Dearborn, MI MSA was 3.2 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts completed during the evaluation period within the Detroit-Warren-Dearborn MSA to better understand area credit and community needs. Participating organizations focused their efforts on economic development, marketing affordable housing, and small business lending needs. Contacts discussed the Detroit workforce, business development, impacts from aging infrastructure, and impacts on the area from the pandemic. The contacts cited the following needs:

- Loans to start-up businesses
- Loans to businesses whose operating models have changed due to the pandemic
- Lines of credit to existing small businesses
- Outreach and technical assistance for qualification for SBA loans
- Affordable housing and affordable housing preservation
- Lines of credit to contractors and developers that participate in the rehabilitation of aging single-family residences owned by LMI individuals and families
- Grants to nonprofits to support legal aid or direct legal aid to non-profits
- Legal assistance to LMI residents for the transfer of titles from deceased individuals to living family members
- Investments and/or leadership in the Motor City Contractor Fund
- Investments in CDFIs that serve Detroit

### Flint MSA

HNB had \$1.7 billion in deposits in the Flint MSA, representing 1.1 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 15 branches and 22 ATMs, of which 19 were deposit taking, representing 1.4 percent of total branches and 1.1 percent of total ATMs. The bank originated and purchased approximately \$439.1 million in home mortgage and small business loans within the Flint MSA representing 0.7 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, nine FDIC-insured institutions operated 50 branches in the AA. HNB ranked second in deposit share, with 29.4 percent. The top two other banks by deposit market share were JPMorgan Chase Bank, National Association with 43.3

percent and The State Bank with 13.4 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Flint MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Flint MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	131	15.3	21.4	35.9	26.0	1.5
Population by Geography	415,874	11.9	18.3	36.4	33.5	0.0
Housing Units by Geography	191,178	13.6	21.2	35.3	29.9	0.0
Owner-Occupied Units by Geography	114,823	8.5	14.9	38.5	38.1	0.0
Occupied Rental Units by Geography	50,445	18.3	28.2	33.7	19.9	0.0
Vacant Units by Geography	25,910	26.9	35.8	24.3	12.9	0.0
Businesses by Geography	24,509	10.1	13.1	42.3	34.1	0.4
Farms by Geography	819	2.9	6.7	39.8	50.5	0.0
Family Distribution by Income Level	106,647	23.6	15.4	20.0	41.0	0.0
Household Distribution by Income Level	165,268	24.4	15.7	17.6	42.2	0.0
Median Family Income MSA - 22420 Flint, MI MSA		\$53,333	Median Housing Value			\$85,142
			Median Gross Rent			\$718
			Families Below Poverty Level			16.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Flint MSA</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)	134	11.9	24.6	30.6	29.1	3.7
Population by Geography	406,211	7.7	20.5	32.0	37.4	2.4
Housing Units by Geography	192,583	10.7	24.9	30.5	31.5	2.4
Owner-Occupied Units by Geography	119,384	6.7	17.5	33.5	39.9	2.5
Occupied Rental Units by Geography	51,197	14.5	36.7	27.4	18.9	2.6
Vacant Units by Geography	22,002	23.2	38.1	21.3	15.5	1.9
Businesses by Geography	25,060	5.4	18.6	33.8	36.6	5.6
Farms by Geography	826	2.8	10.3	39.1	45.9	1.9
Family Distribution by Income Level	108,430	21.3	17.5	20.8	40.5	0.0
Household Distribution by Income Level	170,581	24.0	16.2	18.4	41.4	0.0
Median Family Income MSA - 22420 Flint, MI MSA		\$62,084	Median Housing Value			\$110,717

	Median Gross Rent	\$783
	Families Below Poverty Level	12.9%
<i>Source: 2020 U.S. Census and 2022 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>		

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Flint MSA was \$53,333. Based on this information, low-income families earned less than \$26,667 and moderate-income families earned less than \$42,666. The median housing value in the AA is \$85,142. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$667 for a low-income borrower and \$1,067 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$457. Housing is generally affordable for LMI borrowers in the Flint MSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 172.9 and by the fourth quarter of 2022 had increased to 234.2, representing a 35.5 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for low- and/or moderate-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Flint MSA, the percentage of families living below the poverty level was 16.5 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, education and health services, retail trade, government, and professional and business services contributed to growth and are important economic drivers of the economy. The jobs recovery has made almost no progress since the start of 2022. Wages remain lower than average. Supply-chain issues have improved, but difficulty sourcing microchips and other components is obstructing vehicle production and the recovery of auto-manufacturing jobs. House appreciation also lags the national average, but this has created affordable real estate opportunities for both homebuyers and developers. A shortage of exports from Ukrainian gases and Russian metals is prolonging the shortage of chips. Healthcare employment is an opportunity to improve overall employment trends and offset some of manufacturing's long-term declines. Population decline will eventually impact tax revenue. The largest employers include General Motors Corp., Genesys Regional Medical Center, McLaren Healthcare Corp., and Hurley Medical Center.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Flint, MI MSA was five percent as of January 2020. In April 2020, unemployment levels peaked at 29.9



percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, the unemployment rate has declined, and the non-seasonally adjusted unemployment rate for the Flint, MI MSA was 4.9 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts completed during the evaluation period within the Flint, MI MSA to better understand area credit and community needs. Contacts worked for organizations focused on economic development, community services, and affordable housing. One contact indicated that HNB has been a long-time investor in a loan fund which directly impacts the efforts of their organization, and the bank has had HNB leadership on their board of directors. The contact indicated that HNB has been more active in both providing grants and leadership for their organization than other similarly situated peer banks in the market. The other contact indicated their organization does not have a relationship with any financial institutions for support but does hold its banking relationship with HNB due to its presence in the market.

The contacts cited the following needs:

- Grants for general operating support or program support for organizations that focus on residential services
- Leadership on non-profit boards of directors
- Continued physical presence of bank branches in LMI census tracts
- Grants for programs that support homeownership counseling and small business technical assistance
- Technical assistance for small businesses
- Capital investments into loan funds that support individuals and businesses in Flint
- Serving on loan review committees of organizations that disperse funds into the Flint community

### Saginaw MSA

HNB had \$776 million in deposits in the Saginaw MSA, representing 0.5 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated nine branches and 13 ATMs, of which 10 were deposit taking, representing 0.8 percent of total branches and 0.7 percent of total ATMs. The bank originated and purchased approximately \$217.5 million in home mortgage and small business loans within the Saginaw MSA representing 0.3 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 12 FDIC-insured institutions operated 37 branches in the AA. HNB ranked first in deposit share, with 28.7 percent. The top two other banks by deposit market share were JPMorgan Chase Bank, National Association with 16.8 percent, and PNC Bank, National Association with 12.7 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Saginaw MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Saginaw MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	14.3	17.9	48.2	19.6	0.0
Population by Geography	196,479	11.2	12.5	50.5	25.8	0.0
Housing Units by Geography	86,823	12.3	14.0	50.8	22.9	0.0
Owner-Occupied Units by Geography	56,270	7.8	9.6	54.8	27.8	0.0
Occupied Rental Units by Geography	21,655	18.8	19.3	47.0	14.8	0.0
Vacant Units by Geography	8,898	24.8	29.0	34.8	11.4	0.0
Businesses by Geography	11,115	6.7	11.7	52.5	29.1	0.0
Farms by Geography	565	1.1	3.0	58.9	37.0	0.0
Family Distribution by Income Level	49,689	21.2	17.1	20.7	41.0	0.0
Household Distribution by Income Level	77,925	24.0	16.3	18.2	41.5	0.0
Median Family Income MSA - 40980 Saginaw, MI MSA		\$54,210	Median Housing Value			\$92,112
			Median Gross Rent			\$703
			Families Below Poverty Level			13.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Saginaw MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	8.2	29.5	29.5	32.8	0.0
Population by Geography	190,124	5.2	25.9	31.5	37.5	0.0
Housing Units by Geography	87,789	5.7	28.6	30.2	35.5	0.0
Owner-Occupied Units by Geography	56,509	2.8	21.3	34.3	41.7	0.0
Occupied Rental Units by Geography	22,471	10.4	43.2	22.7	23.7	0.0
Vacant Units by Geography	8,809	12.1	38.8	23.4	25.7	0.0
Businesses by Geography	11,303	3.9	27.3	30.1	38.7	0.0
Farms by Geography	571	0.5	8.1	44.5	46.9	0.0
Family Distribution by Income Level	49,274	20.7	17.7	21.2	40.4	0.0
Household Distribution by Income Level	78,980	23.0	17.0	18.9	41.1	0.0
Median Family Income MSA - 40980 Saginaw, MI MSA		\$64,094	Median Housing Value			\$106,051
			Median Gross Rent			\$788
			Families Below Poverty Level			12.1%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Saginaw MSA was \$54,210. Based on this information, low-income families earned less than \$27,105 and moderate-income families earned less than \$43,368. The median housing value in the AA is \$92,112. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$678 for a low-income borrower and \$1,084 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$494. Housing is generally affordable for LMI borrowers in the Saginaw MSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 160.6 and by the fourth quarter of 2022 had increased to 213.5, representing a 32.9 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for low- and/or moderate-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Saginaw MSA, the overall percentage of families living below the poverty level was 13.5 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, education and health services, retail trade, manufacturing, and government were all contributors to growth and are important economic drivers of the economy. The metro area has recouped a smaller share of pandemic-related losses than the region and nation. Due to supply chain shortages, manufacturing is finding difficulty regaining ground. Unemployment is approaching the pre-pandemic rate, but progress is still lacking because of less than average recovery of the labor force. The housing market is reflective of the labor force with prices falling further behind the US average. Transportation equipment production accounts for more than a third of Saginaw's manufacturing industry, so the area will remain vulnerable to global supply-chain woes. Potential COVID-19 waves in Asia and the Ukraine/Russia war both contribute to supply chain issues. Healthcare positions are expected to increase because of the growing senior population. Below average incomes and poverty rates will increase the need for social services as well. However, other parts of the industry are expected to underperform due to population decline. The scarcity of high paying jobs will continue to send job seekers elsewhere. About 10 percent of payrolls are in high-wage industries, compared to 25 percent nationally. The top employers include Covenant Healthcare, Ascension St. Mary's Hospital, Morley Cos. Inc., and Saginaw Valley State University.

According to the Bureau of Labor and Statistics, the non-seasonally adjusted unemployment rate for the Saginaw, MI MSA was five percent in January 2020. It rose to 5.2 percent in December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

## Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact completed during the evaluation period within the Saginaw, MI MSA to better understand area credit and community needs. The contact's organization focused on small business development, economic development, and affordable housing. The contact described how their organization is active throughout the Saginaw MSA and receives funding from a wide variety of sources including government grants, government contracts, private company donations, and philanthropic organizations. The organization's diverse funding sources brings them into contact with a wide range of stakeholders that have interests in the Saginaw MSA. The contact described that two area hospitals are anchor institutions for Saginaw. The contact cited that housing and rental costs are rising in the city and a labor shortage exist across all industries. The contact described their perception of involvement of local financial institutions and specifically cited HNB as being a strong partner. This includes financial support to their organization, and leadership on their board of directors. The contact also praised HNB for the bank's marketing efforts surrounding the 'Lift Local' small business lending product. Additionally, the contact described how HNB provides grants and donations to various organizations and causes throughout Saginaw.

The contact cited the following needs:

- Affordable housing
- Subordinate lending partners for small businesses
- Funding through grants for non-profits to deliver social services
- Small business loans
- General operating support for non-profits and small businesses
- Mentorship programs for small business owners and technical assistance with credit

## **Scope of Evaluation in Michigan**

The Detroit MSA AA received a full-scope review because it represents the most significant concentration of deposits, lending, and branches in the state of Michigan. The Flint and Saginaw MSA AAs received full-scope reviews because they represent meaningful concentrations of deposits and branches and have not recently received full-scope reviews. The Ann Arbor, Battle Creek, Bay City, Grand Rapids, Jackson, Kalamazoo, Lansing, Midland, Monroe, Muskegon, Niles, and South Bend MSAs and Michigan Non-MSA AA received limited-scope reviews.

HNB did not originate a sufficient volume of small loans to farms in the Saginaw, Ann Arbor, Bay City, Jackson, Kalamazoo, Midland, Monroe, Muskegon, Niles, or South Bend MSAs to conduct a meaningful analysis.

HNB did not originate a sufficient volume of small loans to farms in the Flint or Lansing MSAs during the 2022 analysis period to conduct a meaningful analysis. Performance in those AAs is based solely on loans originated or purchased during the 2020-2021 analysis period.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

### LENDING TEST

The bank's performance under the Lending Test in Michigan is rated Outstanding. Performance in the limited-scope AAs had minimal impact on the overall State Rating.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit, Flint, and Saginaw, MSAs was excellent.

### Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
<b>Full Scope</b>							
Detroit MSA	17,411	13,166	192	336	31,105	40.2	45.8
Flint MSA	1,622	1,525	26	93	3,266	4.2	4.4
Saginaw MSA	830	679	28	55	1,592	2.1	2.0
<b>Limited Scope</b>							
Ann Arbor MSA	1,415	660	21	20	2,116	2.7	3.6
Battle Creek MSA	355	85	4	8	452	0.6	0.9
Bay City MSA	500	291	15	4	810	1.0	1.5
Grand Rapids MSA	8,089	4,694	119	104	13,006	16.8	16.5
Jackson MSA	990	355	7	24	1,376	1.8	0.9
Kalamazoo MSA	540	352	4	12	908	1.2	0.7
Lansing MSA	1,540	1,129	27	39	2,735	3.5	2.8
Midland MSA	362	170	11	6	549	0.7	1.4
Monroe MSA	1,442	400	22	7	1,871	2.4	1.3
Muskegon MSA	1,294	537	9	23	1,863	2.4	0.9
Niles MSA	426	169	9	8	612	0.8	1.3
South Bend MSA	157	57	5	3	222	0.3	0.2
MI Non-MSA	10,477	4,106	248	138	14,969	19.3	15.9
<b>Total</b>	<b>47,450</b>	<b>28,375</b>	<b>747</b>	<b>880</b>	<b>77,452</b>	<b>100.0</b>	<b>100.0</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
<b>Full Scope</b>							
Detroit MSA	4,053,168	1,389,227	14,113	658,385	6,114,893	45.5	45.8
Flint MSA	234,163	160,057	1,472	46,422	442,114	3.3	4.4
Saginaw MSA	108,103	72,312	2,178	34,952	217,545	1.6	2.0
<b>Limited Scope</b>							
Ann Arbor MSA	390,589	46,132	566	11,249	448,536	3.3	3.6
Battle Creek MSA	39,836	8,550	372	9,573	58,331	0.4	0.9
Bay City MSA	55,670	29,804	520	4,349	90,343	0.7	1.5
Grand Rapids MSA	1,548,980	491,782	8,380	143,427	2,192,569	17.4	16.5

Jackson MSA	121,157	38,783	433	25,320	185,693	1.4	0.9
Kalamazoo MSA	133,052	42,331	99	42,637	218,119	1.6	0.7
Lansing MSA	248,428	120,717	2,144	106,523	477,812	3.3	2.8
Midland MSA	57,105	14,301	355	6,433	78,194	0.6	1.4
Monroe MSA	200,412	24,699	1,683	5,003	231,797	1.7	1.3
Muskegon MSA	168,499	53,648	227	26,579	248,953	1.9	0.9
Niles MSA	85,893	21,637	1,227	20,902	129,659	1.0	1.3
South Bend MSA	31,741	3,792	159	978	36,670	0.3	0.2
MI Non-MSA	1,797,500	351,200	15,559	110,679	2,274,938	16.9	15.9
<b>Total</b>	<b>9,274,296</b>	<b>2,868,972</b>	<b>49,487</b>	<b>1,253,411</b>	<b>13,446,166</b>	<b>100.0</b>	<b>100.0</b>

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### *Detroit MSA*

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 8.7 percent. The bank ranked fourth among 38 depository financial institutions placing it in the top 11 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 3.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked fourth among 746 home mortgage lenders in the AA, which placed it in the top one percent of lenders. The top three lenders with a combined market share of 25.6 percent were Rocket Mortgage with 13.5 percent, United Wholesale Mortgage with 8.9 percent, and JPMorgan Chase Bank, National Association with 3.2 percent.

According to peer small business data for 2021, the bank had a market share of 4.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked seventh among 19 small business lenders in the AA, which placed it in the top 37 percent of lenders. The top three lenders with a combined market share of 44.1 percent were American Express National Bank with 18.6 percent, JPMorgan Chase Bank, National Association with 17.3 percent, and Bank of America, National Association with 8.2 percent.

According to peer small farm data for 2021, the bank had a market share of 8.3 percent based on the number of small farm loans originated or purchased. The bank ranked sixth among 22 small farm lenders in the AA, which placed it in the top 28 percent of lenders. The top three lenders with a combined market share of 46.8 percent were JPMorgan Chase Bank, National Association with 22 percent, Comerica Bank with 14.4 percent, and John Deere Financial, FSB with 10.4 percent.

### *Flint MSA*

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 29.4 percent. The bank ranked second among nine depository financial institutions placing it in the top 23 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 4.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 414 home

mortgage lenders in the AA, which placed it in the top one percent of lenders. The top two other lenders with a combined market share of 18.6 percent were Rocket Mortgage with 10.3 percent and Mortgage 300 Corporation with 4.2 percent.

According to peer small business data for 2021, the bank had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 94 small business lenders in the AA, which placed it in the top 4 percent of lenders. The top two other lenders with a combined market share of 46.7 percent were JPMorgan Chase Bank, National Association with 22.3 percent and American Express National Bank with 15.6 percent.

According to peer small farm data for 2021, the bank had a market share of 8.5 percent based on the number of small farm loans originated or purchased. The bank ranked fourth among 12 small farm lenders in the AA, which placed it in the top 34 percent of lenders. The top three lenders with a combined market share of 62.7 percent were JPMorgan Chase Bank, National Association with 25.4 percent, John Deere Financial, FSB with 25.4 percent, and Wells Fargo Bank, National Association with 11.9 percent.

### *Saginaw MSA*

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 28.7 percent. The bank ranked first among 12 depository financial institutions placing it in the top 9 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 5.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 297 home mortgage lenders in the AA, which placed it in the top one percent of lenders. The top two other lenders with a combined market share of 23.8 percent were Frankenmuth Credit Union with 9.3 percent and Rocket Mortgage with 8.8 percent.

According to peer small business data for 2021, the bank had a market share of 8.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 68 small business lenders in the AA, which placed it in the top 4.4 percent of lenders. The top two other lenders with a combined market share of 34.2 percent were American Express National Bank with 13.2 percent and JPMorgan Chase Bank, National Association with 12.4 percent.

According to peer small farm data for 2021, the bank had a market share of 7.4 percent based on the number of small farm loans originated or purchased. The bank ranked fourth among 14 small farm lenders in the AA, which placed it in the top 28.6 percent of lenders. The top three lenders with a combined market share of 66.4 percent were Isabella Bank with 31.2 percent, John Deere Financial, FSB with 18 percent, and TCF National Bank with 17.2 percent.

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

The bank exhibited a good geographic distribution of loans in its AAs. The bank's performance in the Detroit and Flint MSAs was good. The bank's performance in the Saginaw MSA was adequate.

### *Detroit MSA*

### ***Home Mortgage Loans***

Refer to Table O in the state of Michigan 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

#### ***2020-2021***

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the state of Michigan 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

#### ***2020-2021***

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent the performance in 2020-2021.

### ***Small Farm Loans***

Refer to Table S in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small farm loans.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small farm loans was good.

#### ***2020-2021***



The bank's percentage of small farm loans in low- income geographies was below the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The bank's percentage of small farm loans in moderate-income geographies was near to the percentage of businesses in those geographies and was below the aggregate distribution of loans.

2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to a better distribution of lending in both low- and moderate-income geographies.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

*Flint MSA*

### ***Home Mortgage Loans***

Refer to Table O in the state of Michigan 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

2020-2021

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was significantly below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the state of Michigan 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

*2020-2021*

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in those geographies and equaled the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to a worse distribution of lending in the low-income geographies.

***Small Farm Loans***

Refer to Table S in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small farm loans.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was very poor.

*2020-2021*

The bank did not originate any small farm loans in low-income or moderate-income census tracts.

*2022*

The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

***Lending Gap Analysis***

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

*Saginaw MSA****Home Mortgage Loans***

Refer to Table O in the Saginaw MSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

*2020-2021*

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the

percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

## 2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution in moderate-income geographies.

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

Refer to Table Q in the Saginaw MSA 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

## 2020-2021

The bank's percentage of small business loans in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies was below the percentage of businesses in those geographies and exceeded the aggregate distribution of loans.

## 2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distribution in low-income and moderate-income geographies.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

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

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance in the Detroit, Flint, and Saginaw MSAs was good.

### ***Detroit MSA***

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

*2020-2021*

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and equaled the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to a better distribution to low-income borrowers.

***Small Loans to Businesses***

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

*2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 0.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Farm Loans***

Refer to Table T in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

*2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 0.6 percent of its small farm loans. Based on those farms with known revenues, the bank's percentage of small farm loans with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

*Flint MSA*

***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

2020-2021

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Loans to Businesses***

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

2020-2021

The bank did not collect or consider the gross annual revenues in the underwriting of 0.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Farm Loans***

Refer to Table T in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

*2020-2021*

Based on those farms with known revenues, the bank's percentage of small farm loans with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

*2022*

The bank did not originate a sufficient volume of small farm loans to draw a meaningful conclusion.

*Saginaw MSA*

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

*2020-2021*

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table R in the Saginaw MSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

*2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 10.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### **Community Development Lending**

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### *Detroit MSA*

The bank is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 336 CD loans totaling \$658.4 million, which represented 36.7 percent of the allocated tier 1 capital. CD loans primarily supported revitalization and stabilization efforts. By dollar volume, 4.9 percent of these loans funded affordable housing, 32.5 percent funded economic development, 52.6 percent funded revitalization and stabilization efforts, and 9.9 percent funded community services targeted to LMI individuals. The CD loans supporting affordable housing financed 706 units of affordable housing.

Examples of CD loans include:

- The bank originated a \$5.5 million loan for the acquisition and rehabilitation of a 193-unit LIHTC apartment building. The building provides section 8 HUD subsidized rents targeted toward seniors earning between 40-60 percent of the area median family income. The bank also provided an equity investment totaling \$8.1 million toward this project.
- HNB made a \$1.6 million PPP loan to a community food bank, which provides food to more than 400 area food banks, soup kitchens, schools, and other social service agencies.
- The bank originated a \$5 million revolving line of credit and a \$1.5 million loan to finance the purchase of a manufacturing company located in a moderate-income geography. This loan will help retain 40 jobs.

#### *Flint MSA*

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 93 CD loans totaling \$46.4 million, which represented 27 percent of the allocated tier 1 capital. CD loans primarily supported economic development. By dollar volume, 51.6 percent funded economic development, 32.9 percent funded revitalization and stabilization efforts, and 15.4 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$1.8 million loan to a non-profit organization that provides job training and work opportunities to people with disabilities, the underemployed, and those with other special needs in order to help these individuals transition to independence.
- The bank originated a \$3.8 million loan for the construction of a new 13,000 square foot expansion to an existing business. This loan will help to retain 16 jobs and create 40 new jobs for LMI individuals. The average wages for jobs in this business are below the HUD LMI income limits in the AA.
- The bank originated two loans totaling \$168,165 to a nonprofit affordable housing organization which builds and rehabilitates homes for low-income families. These loans consisted of a \$153,165 PPP (SBA-backed) loan and \$15,000 business credit card.

### *Saginaw MSA*

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 55 CD loans totaling \$35 million, which represented 43.7 percent of the allocated tier 1 capital. CD loans primarily supported economic development. By dollar volume, 45.3 percent funded economic development, 35.3 percent funded revitalization and stabilization efforts, and 19.5 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank made a \$5.5 million loan to refinance the expansion of a company's warehouse located in moderate-income geography surrounded by five adjacent LMI geographies. This loan will create 100 seasonal jobs and 10 full-time jobs for low- or moderate-income individuals.
- The bank made two PPP loans totaling \$5.1 million to a tool manufacturing plant located in a low-income geography to support operations during the COVID-19 pandemic.
- The bank originated a \$1.5 revolving line of credit to a company, which provides in-home health care to primarily LMI individuals. A substantial majority of the company's revenues are from state Medicaid programs.

### **Product Innovation and Flexibility**

The institution uses innovative products and/or flexible lending practices in order to serve AA credit needs.

### *Detroit MSA*

As shown in the table below, the bank originated 1,631 loans under its flexible lending programs totaling \$103.2 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.



<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	244	\$32,908
Debt Manager	512	\$8,499
Detroit Habitat Purchase	1	\$70
Detroit Promise 1st	32	\$4,968
Detroit Promise 1st Non IO	14	\$2,599
Detroit Promise 2nd	14	\$107
Detroit Promise Renovation	26	\$476
Fannie Mae Home Ready 30Yr	21	\$3,555
Fannie Mae HomeStyle Renovation	7	\$1,796
Freddie Mac Home Possible 30 YR Fixed	24	\$3,917
MI - HDA - All Products	192	\$23,754
Port - 30 Year Fixed - CAM CRA	121	\$15,153
Port - 30 Year Fixed - Hometown Mortgage	11	\$1,560
Unsecured HI	368	\$6,329
Lift Local – Small Business	96	\$6,760
<b>Total</b>	<b>1,631</b>	<b>\$103,182</b>

*Flint MSA*

As shown in the table below, the bank originated 231 loans under its flexible lending programs totaling \$6.9 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	13	\$1,418
Debt Manager	94	\$1,295
MI - HDA - All Products	15	\$1,305
Port - 30 Year Fixed - CAM CRA	1	\$19
Port - 30 Year Fixed - Hometown Mortgage	2	\$149
Unsecured HI	84	\$1,200
Lift Local – Small Business	22	\$1,465
<b>Total</b>	<b>231</b>	<b>\$6,851</b>

*Saginaw MSA*

As shown in the table below, the bank originated 208 loans under its flexible lending programs totaling \$4.5 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	3	\$225
Debt Manager	51	\$707
MI - HDA - All Products	14	\$1,078

Port - 30 Year Fixed - CAM CRA	2	\$160
Port - 30 Year Fixed - Hometown Mortgage	1	\$88
Unsecured HI	126	\$1,419
Lift Local – Small Business	11	\$788
<b>Total</b>	<b>208</b>	<b>\$4,465</b>

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ann Arbor, Battle Creek, Bay City, Grand Rapids, Jackson, Kalamazoo, Lansing, Midland, Muskegon, and Niles MSAs, and Michigan Combined Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Monroe MSA and South Bend MSAs is weaker than the bank's overall performance under the Lending Test in the full-scope areas due to worse geographic distribution. Weaker performance in the limited-scope AAs did not negatively impact the bank's overall Lending Test rating for the state of Michigan.

Refer to Tables O through T in the state of Michigan section of appendix D for the facts and data that support these conclusions.

### INVESTMENT TEST

The institution's performance under the Investment Test in Michigan is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in Detroit, Flint, and Saginaw MSAs is excellent.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope:</b>										
Detroit MSA	139	42,138	268	131,645	407	43.9	173,784	41.4	26	40,590
Flint MSA	5	5,394	57	19,330	62	6.7	24,724	5.9	3	5,329
Saginaw MSA	3	365	28	9,164	31	3.3	9,530	2.3	1	10
<b>Limited-Scope:</b>										
Ann Arbor MSA	3	542	4	8,420	7	0.8	8,962	2.1	3	29
Battle Creek MSA	1	6	3	20	4	0.4	26	0.0	1	1
Bay City MSA	0	0	9	98	9	1.0	98	0.0	0	0
Grand Rapids MSA	32	18,088	140	47,071	172	18.6	65,159	15.5	21	46,776
Jackson MSA	1	5	11	14,554	12	1.3	14,559	3.5	0	0
Kalamazoo MSA	5	588	13	4,482	18	1.9	5,071	1.2	4	3,621
Lansing MSA	5	2,814	26	18,304	31	3.3	21,118	5.0	6	3,405
Midland MSA	1	46	14	176	15	1.6	222	0.1	1	3
Monroe MSA	2	1,507	8	35	10	1.1	1,542	0.4	2	4,014
Muskegon MSA	11	309	10	11,269	21	2.3	11,578	2.8	2	17
Niles MSA	0	0	8	10,045	8	0.9	10,045	2.4	3	7,877
South Bend MSA	0	0	0	0	0	0	0	0	0	0
MI Non-MSA	19	6,012	90	60,935	109	11.8	66,947	15.9	22	39,927
-BSRA***	5	3,066	6	3,835	11	1.2	6,900	1.6	2	53
<b>Total</b>	<b>232</b>	<b>80,880</b>	<b>695</b>	<b>339,383</b>	<b>927</b>	<b>100</b>	<b>420,265</b>	<b>100</b>	<b>97</b>	<b>151,652</b>

\* 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.

\*\*\*BSRA-Broader Statewide Regional Area.

### *Detroit MSA*

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors.

HNB bank made 268 current period investments totaling \$131.6 million in investments during the evaluation period, of which 192 were qualifying donations totaling \$4.9 million to organizations providing community service and affordable housing to LMI individuals.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to community needs for affordable housing. The dollar volume of current- and prior- period investments represented 9.7 percent of allocated tier 1 capital. This does not include unfunded commitments, which are an additional 2.3 percent of allocated capital. The institution made significant use of complex investments to support CD initiatives. The bank made two single investor LIHTC investments for \$9.1 million and nine LIHTC fund investments totaling \$47.6 million.

Examples of CD investments in the AA include:

- HNB invested \$5 million to help fund revitalization efforts in Detroit LMI neighborhoods. Funding will provide improvements to housing, parks, and streetscapes along Warren Avenue in Detroit, Michigan.
- HNB provided \$15.5 million in Tax Anticipation Draw Notes for a school district in the MSA, which assisted students in the district who receive free or reduce lunches.
- HNB provided an \$8.1 million direct equity investment to finance the acquisition and rehabilitation of an affordable housing project in Detroit, MI. The investment will provide 193 units of senior affordable housing in LMI census tracts. The investment is responsive to the identified need of affordable housing.

#### *Flint MSA*

The institution has an excellent level of qualified CD investments and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

HNB made 57 investments totaling \$19.3 million during the evaluation period, including 54 donations totaling \$557 thousand. Donations primarily supported organizations providing community services to LMI individuals. The dollar volume of current- and prior-period investments (excluding unfunded commitments) represented 14.4 percent of allocated tier 1 capital.

The institution exhibits excellent responsiveness to CD needs. Investments were particularly responsive to identified CD needs for affordable housing. The institution rarely made use of innovative and/or complex investments to support CD initiatives. The bank did not make any single investor LIHTC investments but did make three LIHTC fund investments totaling \$18.9 million.

Examples of CD investments in the AA include:

- The bank made a \$542thousand bond investment to a non-profit Community Development Entity. The investment will help finance community development loans for affordable housing for LMI individuals.
- HNB invested \$5.3 million into a Capital Tax Credit Fund to support the re-development and/or new construction of Federal Low-Income Housing projects in Flint, Michigan.

*Saginaw MSA*

The institution has a significant level of qualified CD investments and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank made a total of 28 investments totaling \$9.2 million during the evaluation period, including 23 qualifying donations totaling \$289,000. Donations primarily supported organizations providing CD investments to LMI individuals. The dollar volume of current- and prior-period investments (excluding unfunded commitments) represented 12 percent of allocated tier 1 capital.

The institution exhibits good responsiveness to CD needs. Investments were particularly responsive to identified CD needs for affordable housing. The institution made use of innovative and/or complex investments to support CD initiatives. The bank made one single investor LIHTC investment for \$205,000 and one LIHTC fund investment totaling \$5 million.

Examples of CD investments in the AA include:

- HNB made a \$5 million investment into a LIHTC equity fund to acquire and rehabilitate a 150-unit property in Saginaw, Michigan.
- HNB approved a \$2.1 million state aid note for a school district located in Saginaw County, Michigan. Proceeds will be used to provide school operations for the fiscal year, while refunding outstanding lunch debt for those LMI free lunch families across the district.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Grand Rapids MSA, Kalamazoo MSA, Jackson MSA, Lansing MSA, Muskegon MSA, and Michigan Non-MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the Battle Creek, Bay City, Midland, Monroe, Niles, and South Bend MSAs is weaker than the bank's overall performance under the Investment Test in the full-scope areas due to lower levels of qualified investments. Weaker performance in the limited-scope AAs did not negatively impact the bank's overall investment rating for the state of Michigan.

## **SERVICE TEST**

The bank's performance under the Service Test in Michigan is rated Outstanding.

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

Based on a full-scope review, the bank's performance in the Detroit and Flint MSAs was excellent while the bank's performance in the Saginaw MSA was good.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full Scope</b>													
Detroit MSA	45.8	110	34	6.4	20.9	35.5	34.5	2.7	7.8	25.6	32.8	32.9	7.8
Flint MSA	4.4	15	4.6	6.7	26.7	46.7	6.7	13.3	7.7	20.5	32	37.4	7.7
Saginaw MSA	2	9	2.8	0	55.6	11.1	33.3	0	5.2	25.9	31.5	37.5	5.2
<b>Limited Scope</b>													
Ann Arbor MSA	3.6	11	3.4	9.1	9.1	45.5	36.4	0	11.1	11.3	38.8	30.6	11.1
Battle Creek MSA	0.9	5	1.5	20	20	40	20	0	5.5	30	38.2	26.4	5.5
Bay City MSA	1.5	8	2.5	0	37.5	50	12.5	0	0	25.9	51	22	0
Grand Rapids MSA	16.5	41	12.7	2.4	19.5	58.5	19.5	0	4.1	20.5	47.8	26.2	4.1
Jackson MSA	0.9	4	1.2	0	0	50	25	25	4.1	27.5	38.6	25.2	4.1
Kalamazoo MSA	0.7	4	1.2	0	0	50	50	0	6.3	21.5	37.6	33.3	6.3
Lansing MSA	2.8	11	3.4	0	18.2	54.5	27.3	0	3.3	18.1	47.9	26.1	3.3
Midland MSA	1.4	7	2.2	0	57.1	28.6	14.3	0	2.8	18.4	54.8	24	2.8
Monroe MSA	1.3	4	1.2	0	25	75	0	0	3.5	11.9	60.8	23.7	3.5
Muskegon MSA	0.9	3	0.9	0	0	100	0	0	10.1	15.1	49.4	25.4	10.1
Niles MSA	1.3	10	3.1	20	10	30	40	0	9.1	15.6	42.8	31.5	9.1
South Bend MSA	0.2	2	0.6	0	0	100	0	0	0	14.1	69.1	16.8	0
MI Non-MSA	15.9	80	24.7	0	28.8	53.8	16.3	1.3	0.5	15.5	64.4	18.8	0.5

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100 percent due to rounding.

### Detroit MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

HNB's distribution of branches in both low- and moderate-income geographies was near to the percentage of the population living within those geographies. Examiners gave positive consideration for 23 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, 14 were located within 1,000 feet of an LMI geography, and the remaining nine serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this report. This had a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and

business customers. HNB had 152 ATMs in the AA, 137 of which were deposit-taking. HNB provided data that indicated 82.2 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 38.8 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery system rating.

#### *Flint MSA*

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

HNB's distribution of branches in low-income geographies was near to, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. The OCC gave positive consideration for one branch in a middle-income geography that serves customers who live in LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this PE.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 22 ATMs in the AA, 19 of which were deposit-taking. HNB provided data that indicated 65.7 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 34.6 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery system rating.

#### *Saginaw MSA*

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. The bank did not operate any branches in a low-income geography.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 13 ATMs in the AA, 10 of which were deposit-taking. HNB provided data that indicated 62.3 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 34 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery system rating.

<b>Distribution of Branch Openings/Closings</b>							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full Scope</b>							
Detroit MSA	5	62	-2	-19	-20	-15	-2
Flint MSA	0	8	0	-2	-5	-1	0

Saginaw MSA	0	5	0	0	-2	-3	0
<b>Limited Scope</b>							
Ann Arbor MSA	0	5	0	0	-4	-1	0
Battle Creek MSA	0	3	0	0	-1	-2	0
Bay City MSA	0	3	0	-2	0	-1	0
Grand Rapids MSA	0	27	0	-5	-13	-9	0
Jackson MSA	0	2	0	-2	0	0	0
Kalamazoo MSA	0	4	0	0	-4	0	0
Lansing MSA	0	15	0	-3	-10	-1	-1
Midland MSA	1	3	0	-1	0	-1	0
Monroe MSA	0	0	0	0	0	0	0
Muskegon MSA	0	3	0	0	-2	-1	0
Niles MSA	0	5	0	-2	-3	0	0
South Bend MSA	0	0	0	0	0	0	0
Michigan Combined Non- MSA	0	43	0	-11	-27	-5	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. The NA category consists of geographies that have not been assigned an income classification.*

### *Detroit MSA*

The institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed 62 branches, four of which were in low-income geographies and 20 of which were in moderate-income geographies. The branch closures were a result of branch consolidation following the TCF merger and the bank's exit from a banking relationship with a local grocery store chain. HNB also opened five branches during the evaluation period, three of which were located in LMI geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 110 branches in the Detroit MSA. Of these, 109 were traditional branches and one was a private banking branch. The traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with 84 branches, including 36 branches in LMI geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 96 of the traditional branches, including 28 in LMI geographies, and maintained the same hours as the branch. The single private banking branch operated from 8:00 a.m. to 5:00 p.m., Monday through Thursday.

### *Flint MSA*

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed eight branches, two of which were in moderate-income geographies. The branch closures were a result of branch consolidation resulting from the TCF merger.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.



The bank operated 15 branches in the Flint MSA, of which 14 were traditional branches and one was a private banking branch. All but one of the traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with 12 branches, including four in LMI geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. One branch, located in a moderate-income geography, operated from 9:00 a.m. to 1:00 p.m., Monday through Friday. Drive-thru facilities operated at 13 of the traditional branches, including all branches in LMI geographies, and maintained the same hours as the branch. The private banking branch operated from 8:00 a.m. to 5:00 p.m., Monday through Friday.

#### *Saginaw MSA*

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed five branches, none of which were in LMI geographies. The branch closures were a result of branch consolidation following the TCF merger.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated nine traditional branches in the Saginaw MSA. These branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with five branches, of which two were located in moderate-income geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at seven of the traditional branches, including three located in moderate-income geographies, and maintained the same hours as the branch.

### **Community Development Services**

#### *Detroit MSA*

The institution provides a relatively high level of CD services.

HNB employees provided 1,079 qualified CD service activities to 66 organizations with 4,036 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 156 of these activities with 21 bank employees providing 1,012 service hours to 27 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 1,015 service activities and 3,828 service hours. HNB employees provided more than 160 hours of small business development and technical assistance, which were responsive to a need identified by community contacts.

Service activity examples during the evaluation period include:

- Twelve HNB employees partnered with a local economic development corporation to provide 110 hours of small business development training through the Lift Local program. Twelve employees provided education related to obtaining financing, accessing capital, reading financial statements, and servicing debt. The organization leads a coalition of public, private, and philanthropic organizations to support the small businesses of Detroit.
- An HNB vice president served on the board of directors and governance committee of a local CD corporation. This organization provides a variety of programming for LMI adults, families, and children. This programming includes after-school programs, summer camps, workforce development

and employment programs, and adult and family financial literacy education. In total, the vice president volunteered 40 hours with this organization during the evaluation period.

- HNB employees volunteered with a human services organization, with one senior vice president serving on the board of directors and governance committee, and 11 other employees, including an executive vice president, providing approximately 40 hours of virtual and in-person financial empowerment training. This organization provides services to LMI residents of Detroit, including counseling, training, and other supportive services. In total, HNB employees provided 114 hours of service to this organization.

### *Flint MSA*

The institution provides a relatively high level of CD services.

HNB employees provided 213 qualified CD service activities to 25 organizations with 694 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 77 of these activities with nine bank employees providing 347 service hours to 15 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 200 service activities and 670 service hours. HNB employees provided more than 21 hours of small business development and technical assistance, which were responsive to a need identified by community contacts.

Service activity examples during the evaluation period include:

- A senior vice president served on the board of directors for an organization that develops affordable housing options for LMI households within the Flint MSA and fosters collaborative community development initiatives. An additional five HNB employees provided home-buyer education inclusive of budgeting, mortgage options, credit scores, and saving down payments. Two additional HNB employees sat on the organization's loan committee. Service to this organization totaled 49 hours across the evaluation period.
- Two HNB employees served on the board of directors and other board committees for an organization that builds and provides affordable housing, assists with critical repair services, and invests in neighborhood projects in LMI geographies within the Flint MSA. This organization also operates a store that sells household items at greatly reduced prices. HNB employees also provided financial education to this organization's clients. Service to this organization totaled 64 hours across the evaluation period.
- HNB employees partnered with a local charitable organization to provide 40 hours of virtual financial empowerment training to LMI individuals. The curriculum included financial education, budgeting, and a hands-on simulation using FDIC educational materials. In total, 14 HNB employees participated in this event.

### *Saginaw MSA*

The institution provides a relatively high level of CD services.

HNB employees provided 113 qualified CD service activities to 15 organizations with 386 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in

38 of these activities with seven bank employees providing 98 service hours to seven organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 109 service activities and 271 service hours.

Service activity examples during the evaluation period include:

- Six HNB employees provided 20 hours of financial literacy education in local schools that primarily serve LMI students. The employees utilized an FDIC curriculum that covered credit, budgeting, saving, investing, and other topics, including homebuying.
- Two HNB employees served on the board of directors and multiple committees for a local housing commission that provides affordable housing options for LMI residents. This includes managing low-income public housing and administering the housing choice voucher program. These HNB employees also provided homebuyer education to the organization's clients. Service to this organization and its clients totaled 90 hours across the evaluation period.
- An HNB employee provided 68 hours of homebuyer and financial literacy education across a five-week financial literacy training course that benefited clients of an affordable housing organization that builds and provides affordable housing to LMI residents. The curriculum included financial goal setting and budgeting, savings and debt service, credit and credit repair, fraud protection, and homeownership and homebuying.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Bay City MSA and Grand Rapids MSA AAs is consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Ann Arbor MSA, Battle Creek MSA, Jackson MSA, Kalamazoo MSA, Lansing MSA, Midland MSA, Monroe MSA, Muskegon MSA, Niles MSA, South Bend MSA, and Michigan Combined Non-MSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope areas. Weaker performance is due to less, but at least still reasonably, accessible service delivery systems in low- and/or moderate-income geographies. Weaker performance in the limited-scope AAs did not impact the overall Service Test rating for the state of Michigan.

## State of Minnesota

**CRA rating for the state of Minnesota:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good and borrower distribution of lending was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made a good level of qualified investments, grants, and donations. Minimal levels or no investments in smaller AAs had a negative impact on the overall investment test rating.
- Service delivery systems are readily accessible to geographies and individuals of different income levels and the institution provides an adequate level of CD services.

## Description of Institution's Operations in Minnesota

HNB delineated five AAs within Minnesota. These AAs consisted of the Minneapolis MSA, the Duluth MSA, Mankato MSA, St. Cloud MSA, and a single non-MSA county evaluated as the MN Non-MSA AA. Minnesota was HNB's was the fourth largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$6.8 billion in deposits in Minnesota representing 4.6 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 80 branches and 138 ATMs, of which 129 were deposit-taking, within the rating area, representing 7.4 percent of total bank branches and seven percent of total ATMs. The bank originated and purchased approximately \$694.7 million in home mortgage and \$91.4 million in small business loans within Minnesota, representing 1.3 percent of total bank loan originations and purchases.

### Minneapolis MSA AA

HNB had \$6.5 billion in deposits in the Minneapolis MSA, representing 4.4 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 76 branches and 130 ATMs, of which 121 were deposit taking, representing 7.1 percent of total branches and 6.6 percent of total ATMs. The bank originated and purchased approximately \$818.8 million in home mortgage and small business loans within the Minneapolis MSA representing 1.2 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 124 FDIC-insured institutions operated 679 branches in the AA. HNB ranked fifth in deposit market share, with 2.9 percent. The top three banks by deposit market share were U.S. Bank, National Association with 38.5 percent, Wells Fargo Bank, National Association with 25.1 percent, and Ameriprise Bank, FSB with 6.8

percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Minneapolis AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	732	7.4	21.6	43.3	26.8	1.0
Population by Geography	3,171,206	6.0	18.6	45.5	29.6	0.3
Housing Units by Geography	1,289,111	5.6	19.4	46.3	28.3	0.3
Owner-Occupied Units by Geography	847,611	2.2	14.5	48.9	34.3	0.1
Occupied Rental Units by Geography	378,382	12.8	29.8	40.7	15.9	0.9
Vacant Units by Geography	63,118	9.2	22.0	46.4	21.6	0.8
Businesses by Geography	348,642	5.1	16.6	45.1	33.0	0.3
Farms by Geography	8,068	1.9	10.9	54.6	32.5	0.0
Family Distribution by Income Level	788,752	20.2	17.2	22.0	40.5	0.0
Household Distribution by Income Level	1,225,993	23.6	16.1	18.4	42.0	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA		\$84,589	Median Housing Value			\$230,018
			Median Gross Rent			\$965
			Families Below Poverty Level			7.0%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Minneapolis MSA</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)	830	5.9	21.3	43.4	28.1	1.3
Population by Geography	3,401,624	5.4	20.1	44.5	29.2	0.8
Housing Units by Geography	1,339,446	5.1	20.5	45.1	28.7	0.6
Owner-Occupied Units by Geography	893,794	2.4	16.4	48.3	32.9	0.1
Occupied Rental Units by Geography	388,850	10.9	29.8	38.1	19.3	1.9
Vacant Units by Geography	56,802	7.6	21.4	42.1	27.8	1.0
Businesses by Geography	406,737	4.1	17.8	42.5	34.7	0.8
Farms by Geography	8,913	1.8	13.5	51.1	33.4	0.2
Family Distribution by Income Level	814,211	19.5	17.9	22.8	39.9	0.0
Household Distribution by Income Level	1,282,644	22.9	16.8	18.9	41.4	0.0

Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA	\$103,977	Median Housing Value	\$288,527
		Median Gross Rent	\$1,162
		Families Below Poverty Level	5.2%

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

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

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the average median family income for the Minneapolis MSA was \$84,589. Based on this information, low-income families earned less than \$42,295 and moderate-income families earned less than \$67,671. The median housing value in the AA is \$230,018. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,057 for a low-income borrower and \$1,692 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,235. Low-income borrowers would be challenged to afford a mortgage loan in the Minneapolis MSA, while housing is generally affordable for moderate-income borrowers in the Minneapolis MSA.

Based on 2020 census data, housing affordability challenges persisted for low-income borrowers and became less affordable for moderate-income borrowers.

The OCC further considered the increase in home prices in the MSA across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 257.5 and by the fourth quarter of 2022 had increased to 325.2, representing a 26.3 percent increase in home prices across the evaluation period. This acceleration in home prices worsens existing affordability concerns in the MSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Minneapolis MSA, the percentage of families living below the family poverty level was seven percent.

### Economic Data

According to Moody's Analytics, dated August 2022, education and health services and professional and business services were contributors to growth and are important economic drivers of the economy. The metropolitan area has regained nearly all jobs lost during the pandemic with the remaining jobs expected to be filled in 2023 due to labor demands near an all-time high. Near-term job growth in professional and business services are expected to exceed most of the nation, but hybrid work models will likely limit downtown activity. With less traffic in the downtown area, local restaurants and retailers will struggle. The manufacturing sector is positioned well with factories running at full-capacity from back-logs and being limited only by labor availability. The largest employers include Fairview Health System, Allina Health System, Target Corp., and University of Minnesota.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Minneapolis-St. Paul-Bloomington, MN MSA was 3.3 percent as of January 2020. In May 2020, unemployment levels peaked at 11.7 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Minneapolis-St. Paul-Bloomington, MN MSA was 2.8 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from four community contacts completed during the evaluation period within the Minneapolis, MN MSA to better understand area credit and community needs. Contacts worked for organizations focused on business development, affordable housing, and CD. Community contacts discussed how significant competition exists for credit in the MSA due to the number of lenders. Contacts described how these lenders generally do a good job of lending across the community. Contacts also cited workforce shortages, especially in skilled labor. The contacts cited the following needs:

- Small business loans for start-up businesses
- Affordable housing, due to rapid increases in prices and tight supply of single-family residences and apartments
- Low-barrier access to capital across all industry sectors
- Continued focus on small business recovery efforts and long-term sustainability after the COVID-19 pandemic
- Transitional and senior care facilities due to lack of inventory for the aging population
- Technical assistance to business start-ups and business expansion projects

### **Scope of Evaluation in Minnesota**

The Minneapolis AA received a full-scope review because it represents the largest concentration of deposits, branches, and lending in the state of Minnesota. The Duluth, Mankato, and St. Cloud MSAs and the Minnesota Non-MSA AA received limited-scope reviews.

HNB did not originate a sufficient volume of small loans to farms in any AA within the state of Minnesota to conduct a meaningful analysis.

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

### **LENDING TEST**

The bank's performance under the Lending Test in Minnesota is rated Outstanding. Performance in the limited scope AAs had minimal impact on the overall state rating.

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

Based on a full-scope review, the bank's performance in the Minneapolis AA was excellent.

## Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

<b>Number of Loans*</b>							
Assessment Area*	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full Scope</b>							
Minneapolis MSA	2,617	1,115	14	15	3,761	92.2	95.9
<b>Limited Scope</b>							
Duluth MSA	29	67	0	1	97	2.4	0.8
Mankato MSA	31	35	2	0	68	1.7	1.4
St. Cloud MSA	31	81	4	0	116	2.8	2.0
MN Non-MSA	11	25	2	0	38	0.9	0.0
<b>Total</b>	<b>2,719</b>	<b>1,323</b>	<b>22</b>	<b>16</b>	<b>4,080</b>	<b>100.0</b>	<b>100.0</b>
BSRA**				3	3		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\* BSRA- Broader Statewide Regional Area.

<b>Dollar Volume of Loans (000s)*</b>							
Assessment Area*	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full Scope</b>							
Minneapolis MSA	673,384	79,549	680	65,211	818,824	96.1	95.9
<b>Limited Scope</b>							
Duluth MSA	9,226	4,412	0	28	13,666	1.6	0.8
Mankato MSA	6,151	1,710	51	0	7,912	0.9	1.4
St. Cloud MSA	4,537	4,489	139	0	9,165	1.1	2.0
MN Non-MSA	1,375	1,279	56	0	2,710	0.3	0
<b>Total</b>	<b>694,673</b>	<b>91,439</b>	<b>926</b>	<b>65,239</b>	<b>852,277</b>	<b>100.0</b>	<b>100.0</b>
BSRA**				2,653	2,653		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\* BSRA- Broader Statewide Regional Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 2.9 percent. The bank ranked fifth among 124 depository financial institutions placing it in the top five percent of banks.

According to peer mortgage data for 2022, the bank had a market share of 0.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 51<sup>st</sup> among 742 home mortgage lenders in the AA, which placed it in the top seven percent of lenders. The top three lenders with a combined market share of 18.5 percent were US Bank, N.A. with 8.2 percent, Wells Fargo Bank, N.A. with 5.9 percent, and Rocket Mortgage with 4.4 percent.

According to peer small business data for 2021, the bank had a market share of 0.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked 34<sup>th</sup> among 220 small business lenders in the AA, which placed it in the top 16 percent of lenders. The top three lenders with a combined market share of 51.7 percent were US Bank, N.A. with 18.9 percent, American Express, N.A. with 16.5 percent, and Wells Fargo Bank, N.A. with 16.3 percent.



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

The bank exhibited good geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the Minnesota 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

#### ***2020-2021***

The bank's percentage of home mortgage loans in low-income geographies approximated the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the Minnesota 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

#### ***2020-2021***

The bank's percentage of small business loans in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies was near to the percentage of businesses in those geographies and approximated the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to stronger distribution of lending in moderate-income geographies.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify

any conspicuous or unexplained gaps in lending.

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

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

#### ***2020-2021***

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table R in the Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

#### ***2020-2021***

The bank collected or considered the gross annual revenues in the underwriting of 100 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

#### ***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to the stronger distribution to businesses with revenues of \$1 million or less.

## Community Development Lending

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 15 CD loans totaling \$65.2 million, which represented 9.7 percent of the allocated tier 1 capital. CD loans primarily supported affordable housing and economic development. By dollar volume, 48.9 percent of these loans funded affordable housing, 29.8 percent funded economic development, 19.7 percent funded revitalization and stabilization efforts, and 1.6 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$30.5 million loan to support the construction of a 277-unit affordable housing project. The housing project consists of one-, two- and three-bedroom LIHTC units restricted at 50 percent of area median income or less to seniors aged 55 and above. This loan is responsive to the identified need of affordable housing.
- The bank originated a \$10 million dollar PPP loan to assist the borrower retain their workforce during the COVID-19 crisis. The borrower's business is in a LMI census tract. This loan was responsive to the ongoing needs associated with the COVID-19 pandemic.
- The bank originated a \$537,000 loan to a housing authority that provides rental assistance to low-income families, senior citizens, and people with disabilities. This loan is responsive to the need for community services.

### *Broader Statewide Regional Area CD Loans*

Because HNB was responsive to CD needs in its AAs, the OCC also considered CD loans in the BSRA that did not have a purpose, mandate, or function to serve the bank's AAs. HNB originated three CD loans totaling \$2.7 million in the BSRA, which did not fund projects with a purpose, mandate, or function to serve the bank's AAs. Lending in the BSRA further supports the excellent Lending Test rating in the state of Minnesota.

## Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 416 loans under its flexible lending programs totaling \$29.7 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	95	\$22,000
Debt Manager	201	\$3,025
MN HFA - All Products	15	\$2,687
Port - 30 Year Fixed - CAM CRA	2	\$310
Unsecured HI	100	\$1,517
Lift Local – Small Business	3	\$116
<b>Total</b>	<b>416</b>	<b>\$29,654</b>

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Duluth MSA, Mankato MSA, St. Cloud MSA, and MN Non-MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance in the Duluth and Mankato MSAs was primarily due to a lower volume of CD lending. Weaker performance in the St. Cloud MSA and Minnesota Combined Non-MSA AA was due to less responsive lending activity and a lower volume of CD lending. Weaker performance in the limited-scope AAs did not impact the overall Lending Test rating.

Refer to Tables O through T in the state of Minnesota section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in Minnesota is rated High Satisfactory. The weaker combined Investment Test performance in the limited-scope AAs negatively affected the bank's overall Investment Test rating for the state of Minnesota.

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

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

### **Number and Amount of Qualified Investments**

The institution had an excellent level of qualified CD investments and grants.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Scope</b>										
Minneapolis MSA	5	\$10,422	71	\$55,506	76	91.6	\$65,928	99.6	2	\$41
<b>Limited Scope</b>										
Duluth MSA	0	0	0	0	0	0	0	0	0	0
Mankato MSA	0	0	1	\$10	1	1.2	\$10	0.0	0	0
St. Cloud MSA	1	\$41	1	\$25	2	2.4	\$66	0.1	1	\$6
MN Non-MSA	0	0	0	0	0	0	0	0	0	0
–BSRA***	4	\$213	0	0	4	4.8	\$213	0.3	2	\$42
<b>Total</b>	<b>10</b>	<b>\$10,676</b>	<b>73</b>	<b>\$55,541</b>	<b>83</b>	<b>100.0</b>	<b>\$66,217</b>	<b>100.0</b>	<b>5</b>	<b>\$89</b>

\* 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.

\*\*\*BSRA-Broader Statewide Regional Area.

The bank made 71 current period investments totaling \$55.5 million during the evaluation period, which included 64 qualifying grants and donations totaling \$1.8 million to approximately 56 organizations. The dollar volume of current- and prior- period investments represented 9.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 97.3 percent of investments supported affordable housing, and 2.6 percent funded community services to LMI individuals. The institution occasionally uses innovative and/or complex investments to support CD initiatives. The bank made six current period LIHTC fund and direct investments totaling \$53.7 million.

Examples of CD investments in the AA include:

- HNB made an investment in a LITHC fund totaling \$12.3 million to support the construction of a 46-unit affordable housing community location in downtown Minneapolis. The investment is responsive to the need of affordable housing in the AA.
- HNB made a \$22.4 million investment in a LIHTC, which supported a 163-unit affordable and work-force housing project in Minneapolis, MN. The bank partnered with various public stakeholders throughout Minneapolis on the project. The investment is responsive to the need of affordable housing in the AA.
- HNB provided a \$250,000 grant to support programming at a non-profit organization focused on serving black-owned businesses and their communities through access to education, advocacy, and economic development. This program will provide business development tools including entrepreneur training, technical assistance, and networking opportunities. The grant is responsive to the community contact-identified need of technical assistance to business start-ups and business expansion projects throughout Minneapolis. Additionally, the grant is responsive to small business recovery efforts after the pandemic.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Duluth MSA, Mankato MSA, St. Cloud MSA, and the Minnesota Non-MSA AAs was weaker than the bank's overall performance under the Investment test in the full-scope area due to very poor levels of qualified investments. The institution's performance under the Investment Test in the combined limited-scope areas had a negative impact on the overall Investment Test rating for the state of Minnesota.

## SERVICE TEST

The bank's performance under the Service Test in Minnesota is rated Outstanding. Performance in the limited-scope AAs had minimal impact on the overall state rating.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA was excellent.

## Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope													
Minneapolis MSA	95.9	76	95	2.6	28.9	47.4	18.4	2.6	5.4	20.1	44.5	29.2	0
Limited Scope													
Duluth MSA	0.8	1	1.3	0	0	100	0	0	1.8	19.0	47.7	29.2	0
Mankato MSA	1.4	2	2.5	0	50	50	0	0	0	30.9	63.1	6.0	0
St. Cloud MSA	2.0	1	1.3	0	0	100	0	0	1.2	16.6	64.3	17.0	0
MN Non-MSA	0	0	0	0	0	0	0	0	0	14.1	34.5	51.5	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100 percent due to rounding.

HNB's distribution of branches in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. The OCC gave positive consideration for 14 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, six were located within 1,000 feet of an LMI geography and the remaining eight serve residents of LMI geographies based on data provided by

bank management and consistent with the methodology described in the Scope of the Evaluation section of this report. This had a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 130 ATMs in the AA, 121 of which were deposit-taking. HNB provided data that indicated 76.6 percent of customers in LMI used the bank's mobile application or accessed online banking during the fourth quarter of 2022. Because HNB acquired these branches and customers during the evaluation period, data from the first quarter of 2020 is unavailable.

<b>Distribution of Branch Openings/Closings</b>							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full Scope</b>							
Minneapolis MSA	1	2	0	-1	0	0	0
<b>Limited Scope</b>							
Duluth MSA	0	0	0	0	0	0	0
Mankato MSA	0	0	0	0	0	0	0
St. Cloud MSA	0	0	0	0	0	0	0
MN Non-MSA	0	0	0	0	0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.*

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

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed two branches, one of which was in a moderate-income geography. The closed branch primarily supported HNB employees rather than the public. HNB also opened one branch during the evaluation period in a geography without an income classification.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 76 branches in the Minneapolis MSA. Of these, 42 were traditional branches, 31 were in-store branches, two were college branches, and one was a private banking branch. The traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with 29 branches, including nine branches in LMI geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 40 of the traditional branches and maintained the same hours as the branch.

For the in-store branches, 24 locations operated from 10:00 a.m. to 6:00 p.m., Monday through Friday and 10:00a.m. to 3:00 p.m. on Saturdays. Seven in-store branches operated from 10:00 a.m. to 2:00 p.m., Monday through Friday. The two college branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday while the Private Banking branch operated from 8:00 a.m. to 5:00 p.m., Monday through Thursday.

## Community Development Services

The institution provides an adequate level of CD services.

HNB employees provided 473 qualified CD service activities to 26 organizations with 1,282 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 56 of these activities with 15 bank employees providing 332 service hours to 15 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 449 service activities and 1,245 service hours.

Service activity examples during the evaluation period include:

- Numerous HNB employees volunteered with local charitable organizations to provide emergency food distribution. In one case, 162 HNB employees provided 290 hours of volunteer service to an organization that provides food to LMI schools. In a second case, 135 employees volunteered 290 hours with an organization that provides food directly to LMI households and individuals. This organization saw an increase in its services of 27 percent due to the COVID-19 pandemic.
- HNB employees participated in financial literacy education programming in a school that exclusively serves LMI students. The education included topics such as budgeting, balancing checkbooks, effective spending decisions, and savings. In total, 28 HNB employees provided more than 100 hours of service to these students.
- Five HNB employees, including one senior vice president, provided small business development training for minority entrepreneurs and small business owners, a majority of whom had gross annual revenues under \$1 million, in partnership with a local chamber of commerce. Topics included preparation for raising capital, networking, marketing, and promoting of small businesses, and creating business plans to attract outside investors. In total, the HNB employees provided 20 hours of training.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Mankato MSA is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Duluth MSA, St. Cloud MSA, and Minnesota Combined Non-MSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance is due to less, but still reasonably, accessible service delivery systems in LMI geographies. Performance in the limited-scope AAs had minimal impact on the overall state rating.



## State of Ohio

**CRA rating for the state of Ohio<sup>8</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs, and the bank was a leader in providing CD services.

## Description of Institution's Operations in Ohio

HNB delineated eleven AAs within Ohio. The OCC combined all non-MSA counties to form the Ohio Combined Non-MSA AA. Ohio was HNB's largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$71.6 billion in deposits in Ohio representing 48.1 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 304 branches and 625 ATMs, of which 512 were deposit-taking, within the rating area, representing 28.2 percent of total bank branches and 31.7 percent of total ATMs. The bank originated and purchased approximately \$16.3 billion in home mortgage and \$4.1 billion in small business loans within Ohio, representing 33.9 percent of total bank loan originations and purchases.

### *Cleveland MSA AA*

HNB had \$14.5 billion in deposits in the Cleveland MSA, representing 9.7 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 76 branches and 154 ATMs, of which 129 were deposit taking, representing 7.1 percent of total branches and 7.8 percent of total ATMs. The bank originated and purchased approximately \$5.7 billion in home mortgage and small business loans within the Cleveland MSA, representing 8.6 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 34 FDIC-insured institutions operated 529 branches in the AA. HNB ranked second in deposit market share, with 11.7 percent. The top three banks by deposit market share were KeyBank, National Association with 41.9

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<sup>88</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

percent, HNB with 11.7 percent, and PNC Bank, National Association with 9.8 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographic data, including housing, business, and economic information for the Cleveland MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	638	18.5	23.0	32.1	24.5	1.9
Population by Geography	2,064,483	12.1	20.0	34.3	33.2	0.4
Housing Units by Geography	956,125	14.1	22.4	33.4	29.4	0.6
Owner-Occupied Units by Geography	552,981	6.5	16.2	37.9	39.2	0.2
Occupied Rental Units by Geography	294,627	22.5	31.0	29.2	16.0	1.2
Vacant Units by Geography	108,517	30.1	30.6	22.4	15.7	1.3
Businesses by Geography	163,063	8.6	16.8	32.6	41.0	1.0
Farms by Geography	4,034	4.0	12.1	39.7	44.0	0.1
Family Distribution by Income Level	521,209	22.8	16.7	19.3	41.2	0.0
Household Distribution by Income Level	847,608	25.9	15.3	16.6	42.2	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Housing Value			\$138,565
			Median Gross Rent			\$761
			Families Below Poverty Level			11.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland MSA</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)	631	14.1	20.8	33.8	27.4	4.0
Population by Geography	2,088,251	9.9	18.3	36.3	34.2	1.3
Housing Units by Geography	963,209	12.2	20.6	34.9	30.3	2.0
Owner-Occupied Units by Geography	563,145	5.7	15.0	39.9	38.5	0.9
Occupied Rental Units by Geography	307,987	20.4	28.9	28.9	18.5	3.3
Vacant Units by Geography	92,077	24.7	27.4	24.7	19.4	3.8
Businesses by Geography	302,502	9.4	16.0	27.7	45.0	1.9
Farms by Geography	6,066	6.1	14.0	36.5	42.9	0.6
Family Distribution by Income Level	515,170	22.3	17.2	19.5	41.1	0.0
Household Distribution by Income Level	871,132	25.1	15.7	16.8	42.3	0.0

Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA	\$76,766	Median Housing Value	\$155,178
		Median Gross Rent	\$853
		Families Below Poverty Level	10.0%
<i>Source: 2020 U.S. Census and 2022 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>			

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Cleveland MSA was \$65,821. Based on this information, low-income families earned less than \$32,911 and moderate-income families earned less than \$52,657. The median housing value in the AA is \$138,565. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$823 for a low-income borrower and \$1,316 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$744. Housing is generally affordable for LMI borrowers in the Cleveland MSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 161.5 and by the fourth quarter of 2022 had increased to 213.5, representing a 32.2 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for LMI borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Cleveland MSA, the percentage of families living below the family poverty level was 11.6 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, manufacturing, professional and business services, and healthcare contributed to job growth and are important economic drivers of the economy. Cleveland's economy is rebounding, in-line with the rest of Ohio, but still trails the nationwide recovery. Payroll employment losses from the pandemic have nearly returned to pre-pandemic levels due to gains in the professional and business sectors, consumer industries, and the public sector. Industrial production is near cycle highs even with employment and supply chain challenges. On the reverse side, growth in the healthcare sector has been slow with no added jobs since the beginning of 2022. Semiconductor shortages have affected auto manufacturers and steel producers, and vehicle sales have declined. With the anticipation of chip increases, the steel and automobile maker industries are expected to improve. The largest employers are Cleveland Clinic Foundation, University Hospitals, U.S. Office of Personnel Management, and Minute Men Cos.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Cleveland-Elyria, OH MSA was 4.8 percent as of January 2020. In April 2020, the unemployment level peaked at 20.5 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Cleveland-Elyria, OH MSA was 3.4 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC held a listening session with multiple community groups and reviewed information from four additional contacts completed during the evaluation period within the Cleveland MSA to better understand area credit and community needs. Contacts worked for a wide range of organizations including affordable housing, CD, economic development, and public health. The contacts cited the following needs:

- Affordable housing
- Investment in CDFIs
- Access to smaller dollar mortgage loans
- Home rehabilitation loans due to older housing stock
- Financial literacy programs for teens and youth
- Small business loans and lines of credit for independent contractors focused on home repairs
- Secured and unsecured credit card products
- Board and committee membership
- Grants and donations to community organizations focused on reducing poverty

### *Columbus, OH MSA AA*

HNB had \$36.8 billion in deposits in the Columbus MSA, representing 24.7 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 63 branches and 196 ATMs, of which 153 were deposit taking, representing 5.8 percent of total branches and 9.9 percent of total ATMs. The bank originated and purchased approximately \$7.8 billion in home mortgage and small business loans within the Columbus MSA, representing 11.8 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 50 FDIC-insured institutions operated 454 branches in the AA. HNB ranked first in deposit share, with 37.1 percent. The top three banks by deposit market share were HNB with 37.1 percent, JPMorgan Chase Bank, National Association with 26.4 percent, and PNC Bank, National Association with 8.2 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics data, including housing, business, and economic information for the Columbus MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Columbus MSA</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)	414	15.7	23.7	31.6	28.0	1.0
Population by Geography	1,872,440	10.3	21.6	34.1	33.2	0.9

Housing Units by Geography	791,535	11.9	22.9	33.7	31.3	0.2
Owner-Occupied Units by Geography	436,614	5.1	17.8	36.5	40.6	0.0
Occupied Rental Units by Geography	282,039	18.2	29.7	31.2	20.5	0.4
Vacant Units by Geography	72,882	28.5	27.2	26.2	17.5	0.6
Businesses by Geography	146,879	9.3	17.6	29.9	42.7	0.5
Farms by Geography	4,323	4.9	15.0	43.3	36.7	0.1
Family Distribution by Income Level	453,530	21.8	16.8	19.4	41.9	0.0
Household Distribution by Income Level	718,653	23.9	16.3	17.2	42.7	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$162,519
			Median Gross Rent			\$846
			Families Below Poverty Level			10.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	491	12.4	22.2	33.8	29.7	1.8
Population by Geography	2,040,518	9.3	19.9	35.0	34.3	1.5
Housing Units by Geography	826,271	10.2	21.4	36.0	31.5	0.9
Owner-Occupied Units by Geography	468,066	4.5	16.3	38.7	40.3	0.2
Occupied Rental Units by Geography	299,749	16.8	28.5	32.9	20.1	1.7
Vacant Units by Geography	58,456	21.4	26.0	30.5	19.5	2.5
Businesses by Geography	277,660	8.4	16.3	31.4	42.5	1.4
Farms by Geography	6,549	4.8	15.6	39.9	39.2	0.4
Family Distribution by Income Level	482,165	21.5	17.1	20.2	41.2	0.0
Household Distribution by Income Level	767,815	23.2	16.4	18.1	42.4	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$84,088	Median Housing Value			\$200,857
			Median Gross Rent			\$1,002
			Families Below Poverty Level			8.8%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Columbus MSA was \$70,454. Based on this information, low-income families earned less than \$35,227 and moderate-income families earned less than \$56,363. The median housing value in the AA is \$162,519. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage

payment was \$881 for a low-income borrower and \$1,409 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$872. Housing is generally affordable for LMI borrowers in the Columbus MSA. Based on 2020 census data, housing became less affordable for LMI borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 210.1 and by the fourth quarter of 2022 had increased to 290.6, representing a 38.3 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for LMI borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Columbus MSA, the percentage of families living below the poverty level was 10.5 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, professional and business services, government, education, and health services contributed to job growth and are important economic drivers of the economy. Recovery in nearly all aspects in Columbus are outperforming the state and the nation. Nearly all jobs lost from the pandemic have been recovered, with growth driven by transportation, utilities, consumer industries, and the public sector. The labor market is healthy and educated, contributing to an increase in hourly wages. Population growth, in addition to low living costs and an abundance of job opportunities, is expected to continue to attract new residents further boosting the economy. The largest employers include The Ohio State University, OhioHealth, JP Morgan Chase & Co., and Nationwide Mutual Insurance Company.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Columbus, OH MSA was 4.3 percent as of January 2020. In April 2020, the unemployment level peaked at 12.6 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Columbus, OH MSA was three percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC held a listening session with multiple community groups and reviewed information from one additional contact completed during the evaluation period within the Columbus, OH MSA to better understand area credit and community needs. Organizations that participated in the listening session included representatives from local government and nonprofit organizations. Listening session participants and contacts described numerous needs in the MSA including affordable housing, small business loans including microloans, small dollar loans for individuals, rehabilitation of older housing stock, workforce development programs, financial literacy and coaching associated with personal financial management, and financial education courses. Participants also highlighted the importance of digital literacy in the workforce and the need for

financial institutions to offer services in various languages for non-native English speakers. Participants expressed a keen interest in banks becoming more involved in CD services that impact individuals in the community. The contacts cited the following needs:

- Affordable housing
- Investments in LIHTCs
- Small business loans, including microloans to smaller businesses
- Small dollar loans for individual homeowners for rehabilitation of their older houses
- Workforce development programs that are paired with workforce housing
- Financial literacy and coaching classes focused on basic and entry-level personal financial management skills
- Financial education classes, including for children and teenagers
- Digital literacy courses and initiatives to support workforce development
- Access to banking and financial services in languages other than English

### *Toledo, OH MSA*

HNB had \$4.2 billion in deposits in the Toledo MSA, representing 2.8 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 33 branches and 58 ATMs, of which 44 were deposit taking, representing 3.1 percent of total branches and 2.9 percent of total ATMs. The bank originated and purchased approximately \$1.6 billion in home mortgage and small business loans within the Toledo MSA representing 2.4 percent of total bank loan originations and purchases.

The following table provides a summary of the demographics data, including housing, business, and economic information for the Toledo MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Toledo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	20.2	15.2	39.9	23.6	1.1
Population by Geography	648,793	12.4	13.7	43.1	29.9	0.9
Housing Units by Geography	301,330	13.6	14.4	44.2	27.8	0.0
Owner-Occupied Units by Geography	168,219	6.3	11.0	47.4	35.3	0.0
Occupied Rental Units by Geography	93,054	22.5	19.4	40.1	17.9	0.1
Vacant Units by Geography	40,057	23.4	16.7	40.2	19.6	0.1
Businesses by Geography	40,499	11.8	9.6	41.6	36.9	0.1
Farms by Geography	1,439	3.5	5.4	51.8	39.2	0.0
Family Distribution by Income Level	161,494	22.5	16.5	19.9	41.2	0.0
Household Distribution by Income Level	261,273	25.2	15.4	16.2	43.2	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$60,742	Median Housing Value			\$118,363
			Median Gross Rent			\$684
			Families Below Poverty Level			13.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Toledo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	225	12.0	20.9	34.2	26.7	6.2
Population by Geography	646,604	8.4	17.0	36.9	33.2	4.5
Housing Units by Geography	303,804	10.2	18.3	37.7	30.1	3.7
Owner-Occupied Units by Geography	169,453	4.5	14.7	41.2	37.7	1.9
Occupied Rental Units by Geography	97,486	17.7	24.9	33.6	18.0	5.8
Vacant Units by Geography	36,865	16.7	18.0	32.0	27.3	6.0
Businesses by Geography	69,382	7.8	16.1	33.0	33.9	9.2
Farms by Geography	2,182	3.8	10.3	45.6	36.3	4.1
Family Distribution by Income Level	159,854	22.4	16.7	19.9	41.0	0.0
Household Distribution by Income Level	266,939	24.9	15.7	17.2	42.2	0.0
Median Family Income MSA - 45780 Toledo, OH MSA		\$70,917	Median Housing Value			\$132,446
			Median Gross Rent			\$769
			Families Below Poverty Level			11.2%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

According to FDIC deposit-market share data, as of June 30, 2022, 27 FDIC-insured institutions operated 181 branches in the AA. HNB ranked first in deposit share, with 24.5 percent. The top three banks by deposit market share were HNB with 24.5 percent, Fifth Third Bank, National Association with 21 percent, and KeyBank, National Association with 8.7 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Toledo MSA was \$60,742. Based on this information, low-income families earned less than \$30,371 and moderate-income families earned less than \$48,594. The median housing value in the AA is \$118,363. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$759 for a low-income borrower and \$1,215 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$635. Housing is generally affordable for LMI borrowers in the Toledo MSA.

Based on 2020 census data, housing remained generally affordable for LMI borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data.



According to the FHFA, in the first quarter of 2020, the HPI index was 166.2 and by the fourth quarter of 2022 had increased to 216.5, representing a 30.3 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that generally has been affordable for LMI borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Toledo MSA, the percentage of families living below the poverty level was 13.4 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, healthcare services, manufacturing, and logistics were all contributors to growth and are important economic drivers of the economy. Hiring in the first half of 2022 outpaced that of the Midwest and the nation. After struggling in 2021, the automobile industry will outperform peers in 2022 due to steady demand and easing chip shortages. However, the industry will face headwinds as the area is heavily reliant on gasoline powered vehicles and the transition to making electrical vehicles that require less labor could reduce employment. The Ukrainian supply of neon gas is also essential for factories in the area, and the ongoing conflict in the region could dampen growth for Toledo. In 2022, the decreased risk of COVID-19 prompted workers to return to hospitals. The top employers include Promedica Health Systems, Mercy Health Partners, The University of Toledo, and Chrysler Group LLC.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Toledo, OH MSA was 5.4 percent as of January 2020. In April 2020, the unemployment level peaked at 20.5 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Toledo, OH MSA was 3.8 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts within the Toledo MSA to better understand area credit and community needs. The contacts worked for organizations focused on affordable housing, fair housing, homeownership, financial counseling, and empowerment. The contacts cited the following needs:

- Affordable housing
- General operating support for non-profits through grants
- Grants for the Financial Empowerment Center
- Lines of credit to non-profit organizations which rely on funding from the City of Toledo
- Home rehabilitation loan products
- Homeownership counseling and financial literacy classes, or referrals to third parties
- Capital investments to expand the minority contractor loan fund
- Grants for the fair housing counselors
- Capacity building grants for Community Development Corporations

## Scope of Evaluation in Ohio

The Cleveland, Columbus, and Toledo MSAs received full-scope reviews because they represent concentrations of deposits, branches, and lending in the state of Ohio. The Akron, Canton, Dayton, Lima, Mansfield, Springfield, Wheeling, and OH Non-MSA AAs received limited-scope reviews.

HNB did not originate a sufficient volume of small loans to farms in 2022 in the Toledo MSA to conduct a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

### LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Outstanding. Performance in the limited-scope AAs had minimal impact on the overall State Rating.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cleveland, Columbus, and Toledo MSAs was excellent.

### Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
<b>Full Scope</b>							
Cleveland MSA	23,573	14,966	322	424	39,285	26.3%	20.2%
Columbus MSA	26,268	11,590	308	469	38,635	25.9%	51.4%
Toledo MSA	9,508	3,400	117	114	13,139	8.8%	5.8%
<b>Limited Scope</b>							
Akron MSA	10,244	5,767	116	211	16,338	11.0%	7.7%
Canton MSA	8,052	2,622	80	103	10,857	7.3%	5.4%
Dayton MSA	4,052	1,973	54	48	6,127	4.1%	1.4%
Lima MSA	426	247	11	15	699	0.5%	0.4%
Mansfield MSA	829	397	11	6	1,243	0.8%	0.3%
Springfield MSA	740	283	35	15	1,073	0.7%	0.5%
Wheeling MSA	508	290	10	6	814	0.5%	0.4%
OH Non-MSA	15,382	5,060	371	137	20,950	14.0%	6.4%
BSRA*				15			
<b>Total</b>	<b>99,582</b>	<b>46,595</b>	<b>1,435</b>	<b>1,563</b>	<b>149,160</b>	<b>100%</b>	<b>100%</b>

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*BSRA-Broader Statewide Regional Area.

<b>Dollar Volume of Loans (\$000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
<b>Full Scope</b>							
Cleveland MSA	3,750,051	1,344,345	19,575	596,898	5,710,869	25.4%	20.2%
Columbus MSA	5,950,195	1,028,541	24,831	799,048	7,802,615	34.7%	51.4%
Toledo MSA	1,264,507	242,842	6,365	109,619	1,623,333	7.2%	5.8%
<b>Limited Scope</b>							
Akron MSA	1,452,602	483,926	6,584	221,715	2,164,827	9.6%	7.7%
Canton MSA	1,113,589	216,615	3,744	78,416	1,412,364	6.3%	5.4%
Dayton MSA	730,469	227,704	5,389	63,015	1,026,577	4.6%	1.4%
Lima MSA	51,821	27,847	1,441	3,873	84,982	0.4%	0.4%
Mansfield MSA	90,398	28,026	410	2,610	121,444	0.5%	0.3%
Springfield MSA	87,763	38,624	3,773	40,482	170,642	0.8%	0.5%
Wheeling MSA	60,845	17,218	481	15,133	93,677	0.4%	0.4%
OH Non-MSA	1,793,093	412,848	16,652	76,616	2,299,209	10.2%	6.4%
BSRA*				46,376			
<b>Total</b>	<b>16,345,333</b>	<b>4,068,536</b>	<b>89,245</b>	<b>2,053,801</b>	<b>22,510,539</b>	<b>100%</b>	<b>100%</b>

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*BSRA-Broader Statewide Regional Area.

### *Cleveland MSA*

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 11.7 percent. The bank ranked second among 34 depository financial institutions placing it in the top six percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 9.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked first among 659 home mortgage lenders in the AA. The top two other lenders with a combined market share of 14.6 percent were Rocket Mortgage with 7.4 percent, and Third Federal Savings and Loan with 7.2 percent.

According to peer small business data for 2021, the bank had a market share of 10 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 184 small business lenders in the AA, which placed it in the top one percent of lenders. The top two lenders with a combined market share of 29.3 percent were American Express National Bank with 15.7 percent and JPMorgan Chase Bank, National Association with 13.6 percent.

According to peer small farm data for 2021, the bank had a market share of 16.2 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 23 small farm lenders in the AA, which placed it in the top nine percent of lenders. The top two other lenders, with a combined market share of 35.5 percent, were JPMorgan Chase Bank, National Association with 21 percent and John Deere Financial FSB with 14.5 percent.

### *Columbus MSA*

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 37.1 percent. The bank ranked first among 50 depository financial institutions.

According to peer mortgage data for 2021, the bank had a market share of 8.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked first among 682 home mortgage lenders in the AA. The top three lenders with a combined market share of 17.2 percent were HNB with 8.6 percent, Rocket Mortgage with 4.4 percent, and Union Savings Bank with 4.2 percent.

According to peer small business data for 2021, the bank had a market share of 8.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 192 small business lenders in the AA, which placed it in the top one percent of lenders. The top three lenders with a combined market share of 43.6 percent were JPMorgan Chase Bank, National Association with 20.5 percent, American Express National Bank with 14.3 percent, and HNB with 8.8 percent.

According to peer small farm data for 2021, the bank had a market share of 16.2 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 23 small farm lenders in the AA, which placed it in the top nine percent of lenders. The top three lenders with a combined market share of 51.7 percent were JPMorgan Chase Bank, National Association with 21 percent, HNB with 16.2 percent, and John Deere Financial FSB with 14.5 percent.

#### *Toledo MSA*

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 24.5 percent. The bank ranked first among 27 depository financial institutions.

According to peer mortgage data for 2021, the bank had a market share of 10.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked first among 478 home mortgage lenders in the AA. The top three lenders with a combined market share of 25.4 percent were HNB with 10.1 percent, Fifth Third Bank, National Association with 8.9 percent, and Rocket Mortgage with 6.4 percent.

According to peer small business data for 2021, the bank had a market share of 10.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 113 small business lenders in the AA, which placed it in the top one percent of lenders. The top three lenders with a combined market share of 33.2 percent were American Express National Bank with 14.5 percent, HNB with 10.5 percent, and The F&M State Bank with 8.2 percent.

According to peer small farm data for 2021, the bank had a market share of 9.3 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth among 18 small farm lenders in the AA, which placed it in the top 23 percent of lenders. The top three lenders with a combined market share of 74.8 percent were The F&M State Bank with 47.6 percent, Premier Bank with 17.1 percent, and John Deere Financial FSB with 10.1 percent.

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

The bank exhibited an adequate geographic distribution of loans in its AAs. The bank's performance in the Toledo MSA was good. The bank's performance in the Cleveland and Columbus MSAs was adequate.

### *Cleveland MSA*

The bank exhibited an adequate geographic distribution of loans in its AA. The bank's performance in 2022 impacted the overall conclusion.

### ***Home Mortgage Loans***

Refer to Table O in the 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

### *2020-2021*

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans.

### *2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

### *2020-2021*

The bank's percentage of small loans to businesses in both LMI geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

### *2022*

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to a weaker distribution of lending in low-income geographies.

***Small Loans to Farms***

Refer to Table S in the 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

***2020-2021***

The bank's percentage of small loans to farms in low-income geographies approximated the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and was below the aggregate distribution of loans.

***2022***

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to weaker distribution of lending in both LMI geographies.

***Lending Gap Analysis***

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

***Columbus MSA***

The bank exhibited an adequate geographic distribution of loans in its AA.

***Home Mortgage Loans***

Refer to Table O in the 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

***2020-2021***

The bank's percentage of home mortgage loans in both low-income and moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

***2022***

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to a weaker distribution of lending in moderate-income geographies.

***Small Loans to Businesses***

Refer to Table Q in the 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

***2020-2021***

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

***2022***

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to a better distribution of lending in both low- and moderate-income geographies.

***Small Loans to Farms***

Refer to Table S in the 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent when considering the strong competition and few borrowers in the AA.

***2020-2021***

The bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

***2022***

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to a weaker distribution of lending in moderate-income geographies.

***Lending Gap Analysis***

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

*Toledo MSA*

The bank exhibited a good geographic distribution of loans in its AA.

*Home Mortgage Loans*

Refer to Table O in the 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

*2020-2021*

The bank's percentage of home mortgage loans in low-income geographies as significantly below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to a better distribution of lending in both low- and moderate-income geographies.

*Small Loans to Businesses*

Refer to Table Q in the 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

*2020-2021*

The bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and approximated the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to a weaker distribution of lending in low-income geographies.

*Small Loans to Farms*

Refer to Table S in the 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 farms.



Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

#### *2020-2021*

The bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

#### *2022*

The bank did not originate a sufficient volume of small loans to farms in 2022 to draw a meaningful conclusion.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

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

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes. The bank's performance in the Cleveland, Columbus, and Toledo MSAs was excellent.

#### *Cleveland MSA*

The bank exhibited an excellent borrower distribution of loans among individuals of different income levels and businesses and farms of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent when considering the decline in housing affordability across the evaluation period.

#### *2020-2021*

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

2022

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to better distributions of loans to low-income borrowers.

***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

2020-2021

The bank did not collect or consider the gross annual revenues in the underwriting of 10.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Loans to Farms***

Refer to Table T in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was excellent when considering the limited number of farms and significant competition from other top lenders.

2020-2021

The bank did not collect or consider the gross annual revenues in the underwriting of 5.5 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Columbus MSA***

The bank exhibited an excellent borrower distribution of loans among individuals of different income levels and businesses and farms of different sizes.

***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent when considering the decline in housing affordability across the evaluation period.

***2020-2021***

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and was near to the aggregate distribution of loans.

***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

***2020-2021***

The bank did not collect or consider the gross annual revenues in the underwriting of 11.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Loans to Farms***

Refer to Table T in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was excellent when considering the limited number of farms and significant competition from other top lenders.

*2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 7.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to farms.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

*Toledo MSA*

The bank exhibited an excellent borrower distribution of loans among individuals of different income levels and businesses of different sizes.

***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent when considering the decline in housing affordability across the evaluation period.

*2020-2021*

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to a better distribution of lending to low-income borrowers.

***Small Loans to Businesses***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was excellent.

*2020-2021*

The bank did not collect or consider the gross annual revenues in the underwriting of 11.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of

small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

2022

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### ***Small Loans to Farms***

Refer to Table T in the Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

2020-2021

The bank did not collect or consider the gross annual revenues in the underwriting of 3.3 percent of its small loans to farms. Based on those farms with known revenues, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to farms.

2022

The bank did not originate a sufficient volume of small loans to farms in 2022 to draw a meaningful conclusion.

## **Community Development Lending**

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

### ***Cleveland MSA***

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 424 CD loans totaling \$596.9 million, which represented 40 percent of the allocated tier 1 capital. CD loans primarily supported revitalization and stabilization efforts, which were responsive to identified community needs. By dollar volume, 4.4 percent of these loans funded affordable housing, 25.5 percent funded economic development, 46 percent funded revitalization and stabilization efforts, and 24 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$40 million construction loan to build a warehouse facility on a vacant parcel located in a moderate-income census tract. The parcel is a former company headquarters and will be

repurposed as a logistics and shipping hub for a major multinational retailer. The project is expected to create at least 100 new jobs in the region.

- The bank originated a \$49.3 million participation loan, of which it will retain \$35 million, to construct a 207-unit multifamily project as the first phase of a larger mixed-use development. The project is in an Opportunity Zone and is consistent with the local government plan for revitalization and stabilizing the low-income geography.
- The bank originated a \$33 million construction loan to fund the construction of a mixed-use complex in an Opportunity Zone and USDA Food Desert. The project, consistent with the local city government revitalization plan, includes 196 apartments and a 40,000 square foot grocery store that will create at least 50 jobs for LMI residents and address food insecurity in the neighborhood.

### *Columbus MSA*

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 469 CD loans totaling \$799 million, which represented 21.1 percent of the allocated tier 1 capital. CD loans primarily supported economic development, which were responsive to the credit needs of the community when considering the COVID-19 pandemic. By dollar volume, 14.5 percent of these loans funded affordable housing, 33.8 percent funded economic development, 32.1 percent funded revitalization and stabilization efforts, and 19.6 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$4.3 million construction loan to finance a 56-unit LIHTC-eligible affordable housing project. Each unit is subsidized under a Housing Assistance Payments (HAP) contract that limits rent to 30 percent of household income. HNB also supported this project through a \$10 million equity investment and supported a successful \$1 million FHLB grant application.
- The bank originated a \$10.9 million construction loan to finance the construction of a 50-unit LIHTC affordable housing project in Columbus. Housing units will be restricted to households earning up to 30, 50, 60, and 70 percent of the area median income. HNB also supported this project through a \$10 million equity investment.
- The bank acted as an agent for two participation loans, totaling \$57.2 million, of which the bank retained \$24.7 million, for the construction of a multi-phase, mixed-use project in a low-income suburb of Columbus. The project is consistent with the community's District Plan to retain existing and attract new businesses and residents to the area. The project will create more than 250 units of housing and over 23,000 square feet of office and retail space.

### *Toledo MSA*

The institution is a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion.

The bank made 114 CD loans totaling \$109.6 million, which represented 25.6 percent of the allocated tier 1 capital. CD loans primarily supported revitalization and stabilization, which was responsive to identified community needs. By dollar volume, 8.9 percent of these loans funded affordable housing, 22.3 percent funded economic development, 55.9 percent funded revitalization and stabilization efforts, and 13 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated five loans, totaling \$26.4 million to finance the first and second phases of a redevelopment project in a low-income geography in downtown Toledo. The project combines Federal and State Historic Tax Credits and a local property tax abatement to convert a historic property into a mixed-use property, including 93 multifamily units and 64 thousand square feet of commercial and office space. The project is an adaptive reuse of an obsolete property subject to the Obsolete Property Rehabilitation Act and will revitalize the downtown area by attracting new and retaining existing residents and businesses.
- The bank originated two loans totaling \$8.5 million to fund the construction of a local innovation center in a former post office in downtown Toledo. The center will serve as a technology training facility for local entrepreneurs and small business owners, with a focus on those from LMI, minority, or underserved backgrounds. The project will also create 173 new, permanent jobs for the residents of the low-income geography and surrounding LMI geographies.
- The bank originated a \$6.7 million construction loan to finance a 46-unit, LIHTC-eligible, permanent supportive housing project. All units will be restricted to residents with incomes below 30 or 50 percent of the annual median income and will target individuals experiencing chronic homelessness. The project includes a 15-year Housing Assistance Payment (HAP) contract. HNB further made an equity investment in the project and supported a successful FHLB AHP grant application.

### *Broader Statewide and Regional Lending*

HNB originated additional CD loans in the BSRA. The bank originated one loan totaling \$12.5 million to fund a project that had a purpose, mandate, or function to serve the bank's AAs. Because HNB was responsive to credit needs in its assessment area, the OCC also considered CD loans in the BSRA that did not have a purpose, mandate, or function to serve the bank's AAs. The bank originated an additional 14 CD loans totaling \$33.9 million within the state of Ohio. CD lending in the BSRA further supported the excellent Lending Test rating in Ohio.

## **Product Innovation and Flexibility**

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

### *Cleveland MSA*

As shown in the table below, the bank originated 1,811 loans under its flexible lending programs totaling \$101.1 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	481	\$56,326
Debt Manager	630	\$10,311
ECO-LINK Unsecured	2	\$80
Equity - 10 Year Fixed - Cuyahoga HELP	28	\$964
Equity - 5 Year Fixed - Cuyahoga HELP	4	\$44
Equity - 7 Year Fixed - ECO Link	2	\$60
Huntington Hometown Mortgage	28	\$2,337
OH HFA - All Products	79	\$11,402
Port - 30 Year Fixed - CAM CRA	46	\$4,470
Port - 30 Year Fixed - CAM CRA Section 8	1	\$50
Port - 30 Year Fixed - Hometown Mortgage	18	\$1,838
Unsecured HI	390	\$6,109
Lift Local – Small Business	102	7,147
<b>Total</b>	<b>1,811</b>	<b>\$101,139</b>

### *Columbus MSA*

As shown in the table below, the bank originated 1,498 loans under its flexible lending programs totaling \$101.3 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	344	\$53,535
CAM (CRA) 30yr Fixed	1	\$147
Debt Manager	543	\$9,274
ECO-LINK Unsecured	2	\$53
Equity - 5 Year Fixed - ECO Link	1	\$19
Equity - 7 Year Fixed - ECO Link	1	\$50
OH HFA - All Products	87	\$13,727
OH HFA - 30 Year Fixed - Conv	42	\$6,151
Port - 30 Year Fixed - CAM CRA	55	\$7,121
Port - 30 Year Fixed - Hometown Mortgage	29	\$4,201
Port - 30 Year Fixed - LMIT Equity 2nd Mortgage	9	\$314
Unsecured HI	331	\$5,467
Lift Local – Small Business	95	\$7,367
<b>Total</b>	<b>1,498</b>	<b>\$101,276</b>



*Toledo MSA*

As shown in the table below, the bank originated 1,498 loans under its flexible lending programs totaling \$101.3 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	293	\$32,524
Debt Manager	293	\$4,638
OH HFA - All Products	53	\$6,741
Port - 30 Year Fixed - CAM CRA	7	\$620
Port - 30 Year Fixed - Hometown Mortgage	14	\$820
Unsecured HI	234	\$3,549
Lift Local – Small Business	54	\$2,757
<b>Total</b>	<b>948</b>	<b>\$51,649</b>

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Akron, Canton, Dayton, Lima, Mansfield, and Springfield MSAs and the Ohio Combined Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Wheeling MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas due to worse geographic distributions of loans. Performance in the limited-scope AAs had minimal impact on the overall State Rating.

Refer to Tables O through T in the state of Ohio section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The institution's performance under the Investment Test in Ohio is rated Outstanding.

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

Based on a full-scope review, the bank's performance in the Cleveland-Elyria MSA, Columbus MSA, and Toledo MSA is excellent.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	% of Total #	\$ (000's)	% of Total \$	#	\$(000's)
<b>Full Scope</b>										
Cleveland MSA	44	42,101	203	94,522	247	12.4	136,624	16.7	37	19,142
Columbus MSA	42	43,286	986	323,099	1,028	51.4	366,386	44.9	36	45,737
Toledo MSA	17	8,855	64	50,476	81	4.1	59,331	7.3	14	9,323
<b>Limited Scope</b>										
Akron MSA	17	12,148	152	132,681	169	8.5	144,829	17.7	14	15,402
Canton MSA	16	2,506	85	22,169	101	5.1	24,675	3.0	6	3,150
Dayton MSA	16	9,661	160	28,239	176	8.8	37,900	4.6	11	2,906
Lima MSA	2	435	9	3,796	11	0.6	4,231	0.5	2	1,696
Mansfield MSA	3	93	40	819	43	2.2	913	0.1	1	10
Springfield MSA	14	1,713	42	3,409	56	2.8	5,122	0.6	4	507
Wheeling MSA	1	114	5	2,399	6	0.3	2,513	0.3	1	1,740
OH Non-MSA	24	10,337	57	24,012	81	4.1	34,350	4.2	21	4,456
<b>Total</b>	<b>196</b>	<b>131,250</b>	<b>1,803</b>	<b>685,622</b>	<b>1,999</b>	<b>100.0</b>	<b>816,872</b>	<b>100.0</b>	<b>147</b>	<b>104,068</b>

\* 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.

### Cleveland MSA

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors.

The bank made current period investments totaling \$94.5 million during the evaluation period, which includes 159 qualifying grants and donations totaling \$2.6 million to approximately 80 organizations. The dollar volume of current- and prior- period investments represented 9.1 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 94.6 percent of investments supported affordable housing, 1.3 percent funded community services to LMI individuals, 0.3 percent supported revitalization and stabilization efforts, and 3.8 percent supported economic development. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- A \$6.2 million equity investment that involves the new construction of 88 units of affordable housing set aside for families earning less than 60 percent of the average median income for Cuyahoga County, Ohio. Nine units, which will operate under the Ohio Section 811 Project Rental

Assistance Program, will be set aside for individuals and households with members who are disabled.

- A \$2 million equity investment in a new loan fund for the purpose of providing loans and grants to property owners across Cleveland. The fund's main objectives were reducing lead levels in rental and owned housing stock in Cleveland, Ohio and assist low-income landlords and owners of one, two and multifamily housing properties in Cleveland, Ohio to rehabilitate properties and improve the health, welfare, and safety of children by improving the housing conditions in low-income neighborhoods.
- Donated \$250,000 to a community-wide public/private partnership to help the development, funding, visibility, and impact of early childhood services in Cuyahoga County. The funds donated were used to support six early childhood development centers in the area.

### *Columbus MSA*

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors.

The bank made current period investments totaling \$323.1 million during the evaluation period, which includes 269 qualifying grants and donations totaling \$8.2 million to approximately 120 organizations. The dollar volume of current- and prior- period investments represented 9.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 100 percent of investments supported affordable housing. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- A \$40 million Equity Equivalent investment which will supplement investments in affordable housing and workforce housing developments throughout Franklin County.
- Investment of \$67.8 million in direct purchase, tax exempt, bond debt for a children's hospital. The hospital is in a low-income census tract and Opportunity Zone.
- A \$9.8 million investment for a new construction project to provide permanent supportive housing to individuals who have histories of homelessness and disability. The project contains 63, one-bedroom/one-bathroom units. All 63 units will have rental assistance to limit the portion of rent paid by residents to 30 percent of their incomes.

### *Toledo MSA*

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors.

The bank made current period investments totaling \$50.5 million during the evaluation period, which includes 59 qualifying grants and donations totaling \$1 million to approximately 30 organizations. The

dollar volume of current- and prior- period investments represented 13.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 95 percent of investments supported affordable housing and 5 percent supported revitalization and stabilization efforts. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- A \$10.9 million investment for a 46-unit Single Room Occupancy project. The project targets persons that are chronically homeless.
- A \$1 million investment to fund the construction of 40 affordable rental homes, which are three-to-four-bedroom units located in a low-income area.
- A \$3.8 million investment for the purpose of constructing a new 55-unit development that provides subsidized housing for seniors. It includes a clubhouse that hosts a fitness center, a business center, library, media room, and outdoor living area.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Akron MSA, Canton-Massillon MSA, Dayton-Kettering MSA, Lima MSA, Mansfield MSA, Springfield MSA, Wheeling MSA, and the Ohio Combined Non-MSA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

### **SERVICE TEST**

The bank's performance under the Service Test in Ohio is rated Outstanding. Performance in the limited-scope AAs had minimal impact on the overall state conclusion.

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

Based on a full-scope review, the bank's performance in the Cleveland MSA and Columbus MSA was excellent while the bank's performance in the Toledo MSA was good.

## Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full Scope</b>													
Cleveland MSA	20.2	76	25	9.2	18.4	36.8	35.5	0	9.9	18.3	36.3	34.2	0
Columbus MSA	51.4	63	20.7	9.5	14.3	27.0	49.2	0	9.3	19.9	35.0	34.3	0
Toledo MSA	5.8	33	10.9	0	12.1	48.5	27.3	12.1	8.4	17.0	36.9	33.2	0
<b>Limited Scope</b>													
Akron MSA	7.7	28	9.2	7.1	14.3	46.4	28.6	3.6	8.4	19.5	39.2	30.8	0
Canton MSA	5.4	20	6.6	0	15.0	55.0	30	0	6.2	13.7	53.0	27.1	0
Dayton MSA	1.4	12	3.9	0	25.0	33.3	41.7	0	8.2	20.4	38.2	32.4	0
Lima MSA	0.4	3	1.0	0	33.3	66.7	0	0	8.5	24.9	43.9	22.8	0
Mansfield MSA	0.3	3	1.0	0	0	66.7	33.3	0	8.6	14.2	47.9	25.3	0
Springfield MSA	0.5	3	1.0	0	33.3	66.7	0	0	7.6	20.7	41.4	30.2	0
Wheeling MSA	0.4	5	1.6	0	20	40	40	0	0	24.6	53.5	22.0	0
OH Non-MSA	6.4	58	19.1	0	29.3	56.9	13.8	0	1.3	16.3	64.1	17.7	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100 percent due to rounding.

### Cleveland MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

HNB's distribution of branches in low-income geographies approximated and in moderate-income geographies exceeded, the percentage of the population living within those geographies. The OCC gave positive consideration for 12 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, seven were located within 1,000 feet of an LMI geography, and the remaining five served residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this report.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 154 ATMs in the AA, 129 of which were deposit-taking. HNB provided data that indicated 79.8 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 38.6 percent for customers in LMI geographies since the first quarter of 2020.

### Columbus MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

HNB's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was near to, the percentage of the population living within those geographies. The OCC gave positive consideration for 10 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, six were located within 1,000 feet of an LMI geography, and the remaining four serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this report.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 196 ATMs in the AA, 153 of which were deposit-taking. HNB provided data that indicated 83.4 percent of customers in LMI used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 38.2 percent for customers in LMI geographies since the first quarter of 2020.

#### *Toledo MSA*

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

HNB's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies. The bank did not operate any branches in low-income geographies. The OCC gave positive consideration for 10 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, six were located within 1,000 feet of an LMI geography and the remaining four serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this report. This had a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 58 ATMs in the AA, 44 of which were deposit-taking. HNB provided data that indicated 79.4 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. This was an increase of 34.7 percent for customers in LMI geographies since the first quarter of 2020.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope							
Cleveland MSA	4	50	-3	-5	-22	-16	0
Columbus MSA	5	21	-1	-2	-8	-4	-1
Toledo MSA	0	1	0	0	0	-1	0
Limited Scope							
Akron MSA	0	15	0	-4	-6	-5	0
Canton MSA	0	6	0	0	-3	-3	0
Dayton MSA	0	0	0	0	0	0	0
Lima MSA	0	0	0	0	0	0	0
Mansfield MSA	0	0	0	0	0	0	0
Springfield MSA	0	0	0	0	0	0	0
Wheeling MSA	0	0	0	0	0	0	0
OH Non-MSA	0	7	0	-2	-5	0	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.  
The NA category consists of geographies that have not been assigned an income classification.

### Cleveland MSA

The institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed 50 branches, three of which were in low-income geographies and five of which were in moderate-income geographies. The branch closures were a result of branch consolidation, branch duplication due to the TCF merger, and a decision to exit a relationship with a local grocery chain. HNB also opened four branches during the evaluation period, none of which were in LMI geographies. Service delivery systems remain readily accessible given the distribution of remaining branches, the number of MUI branches that service residents of LMI geographies, and the accessibility of ADS.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 76 branches in the Cleveland MSA. These included 68 traditional branches, five remote drive-thru branches, two private banking branches, and one college branch.

The 68 traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, and 63 of these branches, including all but two branches in LMI geographies, operated from 9:00 a.m. to 12:00 p.m. on Saturdays. Drive-thru facilities operated at 53 of the traditional branches, including 15 branches in LMI geographies, and maintained the same hours as the branch.

The five remote drive-thru branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with one branch operating from 9:00 a.m. to 12:00 p.m. on Saturdays. The two private banking branches and the single college branch operated from 9:00 a.m. to 5:00 p.m., Monday through Friday.

*Columbus MSA*

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed 21 branches, one of which was in a low-income geography and two of which were in moderate-income geographies. The branch closures were a result of declining usage and proximity to other HNB branches. HNB also opened five branches during the evaluation period, none of which were in LMI geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 63 branches in the Columbus MSA. These included 60 traditional branches, including the bank's main branch, one private banking branch, and two college branches.

Among the traditional branches, 54 branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, while 52 of these branches, including all branches in LMI geographies, operated on Saturdays from 9:00 a.m. to 12:00 p.m. Five branches, one of which was in a low-income geography, operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and 9:00 a.m. to 5:00 p.m. on Fridays. Four of these five branches, including the branch in the low-income geography, were open on Saturdays from 9:00 a.m. to 12:00 p.m. One branch located in a low-income census tract was open from 9:00 a.m. to 1:00 p.m., and the bank's main branch operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday and 9:00 a.m. to 5:00 p.m. on Fridays. Drive-thru facilities operated at 60 of the traditional branches, including 12 branches in LMI geographies, and maintained the same hours as the branch.

The two college branches and the single private banking branch operated from 9:00 a.m. to 5:00 p.m., Monday through Friday with one college branch operating on Saturdays from 9:00 a.m. to 12:00 p.m.

*Toledo MSA*

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed one branch located in an upper-income census tract due to declining usage and proximity to other branches.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 33 branches in the Toledo MSA. Of these, 28 were traditional branches, three were remote drive-thru branches, and two were college branches. For the traditional branches, 23 operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, while five operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and from 9:00 a.m. to 5:00 p.m. on Fridays. In total, 26 branches, including all branches located in moderate-income geographies, operated on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 26 of the traditional branches, including all branches located in moderate-income geographies, and maintained the same hours as the branch. The three remote drive-thru branches and two college branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday.



## Community Development Services

### *Cleveland MSA*

The institution provides a relatively high level of CD services.

HNB employees provided 1,112 qualified CD service activities to 69 organizations with 3,282 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 90 of these activities with 26 bank employees providing 778 service hours to 30 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 1,101 service activities and 3,152 service hours. Bank employees provided 732 hours of financial education, which was responsive to identified community needs in this AA.

Service activity examples during the evaluation period include:

- An HNB employee served on the board of directors, executive committee, strategic planning committee, and loan committee of a certified CDFI and its subsidiary organization. This organization originates real estate loans in LMI communities and provides technical support to small businesses. During the evaluation period, this totaled 90 hours of service.
- One hundred forty-six HNB employees provided 793 hours of volunteer service with a local workforce development organization. This partnership included virtual and in-person financial literacy and career readiness programming during the evaluation period. One HNB employee served on the board of directors for this organization and provided 43.5 hours of service in a governance and fundraising capacity.
- A senior HNB officer volunteered 21 hours during the evaluation period in support of a coalition of local charitable foundations and organizations. The officer provided technical expertise to corporate, philanthropic, educational, health care, workforce, and community-based organizations that provide internet devices, improve broadband access, and support community efforts at improving internet access within the Cleveland MSA.

### *Columbus MSA*

The institution is a leader in providing CD services.

HNB employees provided 746 qualified CD service activities to 105 organizations with 4,127 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 184 of these activities with 36 bank employees providing 1,992 service hours to 40 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 724 service activities and 3,909 service hours. Bank employees provided 287 hours of financial education, which was responsive to identified community needs in this AA.

Service activity examples during the evaluation period include:

- An HNB employee volunteered 32 hours in cooperation with a local small business incubator as part of the bank's Lift Local Initiative. The program and organization support minority-, woman-, and veteran-owned businesses during both start-up and expansion phases. The employee provided information on capital access, loan information, elevator pitches, and networking.
- An HNB employee served on the board of directors and governance, executive, communication, and programming committees for an organization that empowers women to achieve economic independence by providing a network of support, professional attire, and developmental tools. The employee's service during the evaluation period totaled 176 hours.
- More than 40 HNB employees provided financial education and financial literacy seminars to LMI students, families, households, and seniors in partnership with 21 separate community, educational, and other charitable or community organizations. These events occurred, in partnership with senior-living centers, schools that serve low-income students, community groups, career centers, religious organizations, youth organizations, and other community groups. Total hours committed to financial education exceeded 270 hours during the evaluation period.

#### *Toledo MSA*

The institution provides a relatively high level of CD services.

HNB employees provided 571 qualified CD service activities to 37 organizations with 1,334 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 257 of these activities with 21 bank employees providing 590 service hours to 30 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 533 service activities and 1,282 service hours. Bank employees provided 185 hours of financial education, which was responsive to identified community needs in this AA.

Service activity examples during the evaluation period include:

- A senior bank officer and regional president served on the board of directors for an organization that supports small businesses by providing capital, services, networking opportunities, and innovation. Eleven other HNB employees provided 50 hours of small business development training to the organization's clients. Topics included business scaling, accessing capital, and local options for support.
- Five HNB employees, including one regional president, provided 60 hours of board and committee service to a local affordable housing organization throughout the evaluation period. This organization provides affordable housing to LMI families and individuals, through public housing, housing vouchers, mixed-income, and market rate properties.
- Ten HNB employees, including two senior vice presidents, provided financial education seminars to LMI students in partnership with two local organizations. This included a stock market simulation, career education, and personal finance programming. The employees volunteered a total of 54 hours during the evaluation period.

## **Conclusions for Areas Receiving Limited-Scope Review**

Based on limited-scope reviews, the bank's performance under the Service Test in the Akron MSA, Canton MSA, Dayton MSA, Lima MSA, Mansfield MSA, Springfield MSA, Wheeling MSA, and Ohio Combined Non-MSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope areas. Weaker performance was due to less, but still at least reasonably, accessible service delivery systems in low-income geographies. Performance in the limited-scope AAs had minimal impact on the overall state conclusion.

## State of Pennsylvania

**CRA rating for the state of Pennsylvania<sup>9</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was good and borrower distribution of lending was excellent.
- The bank was a leader in making CD loans.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AAs, and the bank provided an adequate level of CD services.

## Description of Institution's Operations in Pennsylvania

HNB delineated three AAs within the state of Pennsylvania. These AAs consisted of the Pittsburgh, MSA, the Erie, PA MSA, and a single non-MSA county evaluated as the PA Non-MSA AA.

Pennsylvania was HNB's 6<sup>th</sup> largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$4.9 billion in deposits in Pennsylvania representing 3.3 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 44 branches and 59 ATMs, of which 55 were deposit-taking, within the rating area, representing 4.1 percent of total bank branches and three percent of total ATMs. The bank originated and purchased approximately \$1.2 billion in home mortgage and \$447.5 million in small business loans within Pennsylvania representing 0.9 percent of total bank loan originations and purchases.

### Pittsburgh MSA AA

HNB had \$4.3 billion in deposits in the Pittsburgh MSA, representing 2.9 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 37 branches and 48 ATMs, of which 46 were deposit taking, representing 3.4 percent of total branches and 2.4 percent of total ATMs. The bank originated and purchased approximately \$437.6 million in home mortgage and small business loans within the Pittsburgh MSA representing 0.7 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, there were 47 FDIC-insured institutions operating 673 branches in the AA. HNB ranked ninth in deposit share, with 1.9 percent. The

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<sup>99</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

top three banks by deposit market share were PNC Bank, National Association with 43.5 percent, The Bank of New York Mellon with 14.4 percent, and BNY Mellon, National Association with 12 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Pittsburgh MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	656	8.8	21.6	44.7	22.6	2.3
Population by Geography	2,156,096	5.2	17.1	48.6	28.5	0.6
Housing Units by Geography	1,009,395	6.1	19.2	48.7	25.9	0.1
Owner-Occupied Units by Geography	630,967	2.8	14.3	51.9	31.1	0.0
Occupied Rental Units by Geography	278,034	11.1	26.8	43.7	18.1	0.4
Vacant Units by Geography	100,394	13.0	28.9	42.6	15.2	0.3
Businesses by Geography	220,505	5.0	14.2	41.6	38.3	0.9
Farms by Geography	5,107	2.3	10.6	57.3	29.7	0.1
Family Distribution by Income Level	558,302	20.3	17.1	20.5	42.1	0.0
Household Distribution by Income Level	909,001	24.6	15.3	17.0	43.2	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$140,986
			Median Gross Rent			\$764
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Pittsburgh MSA</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)	669	7.3	21.7	42.5	25.1	3.4
Population by Geography	2,176,568	5.2	17.7	43.3	33.0	0.9
Housing Units by Geography	1,033,137	6.0	20.3	44.2	28.9	0.6
Owner-Occupied Units by Geography	645,626	2.6	16.4	47.1	33.7	0.2
Occupied Rental Units by Geography	288,853	11.3	26.1	39.3	21.9	1.4
Vacant Units by Geography	98,658	12.2	28.8	39.9	18.1	0.9
Businesses by Geography	251,570	5.5	14.5	38.7	39.6	1.8
Farms by Geography	5,651	2.3	13.7	52.3	31.2	0.5
Family Distribution by Income Level	552,795	19.3	17.8	21.1	41.8	0.0
Household Distribution by Income Level	934,479	24.3	15.5	17.5	42.8	0.0

Median Family Income MSA - 38300 Pittsburgh, PA MSA	\$82,642	Median Housing Value	\$172,926
		Median Gross Rent	\$894
		Families Below Poverty Level	6.5%
<i>Source: 2020 U.S. Census and 2022 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>			

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Pittsburgh MSA was \$69,624. Based on this information low-income families earned less than \$34,812 and moderate-income families earned less than \$55,699. The median housing value in the AA is \$140,986. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$870 for a low-income borrower and \$1,392 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$757. Housing is generally affordable for low- and moderate-income borrowers in the Pittsburgh MSA.

Based on 2020 census data, housing remained generally affordable for low- and moderate-income borrowers.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 220.7 and by the fourth quarter of 2022 had increased to 282.1, representing a 27.8 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for low-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Pittsburgh MSA, the percentage of families living below the poverty level was 8.1 percent.

### Economic Data

According to Moody's Analytics, dated May 2022, financial, medical, and energy were all contributors to growth and are important economic drivers of the economy. Pittsburgh's recovery is among the lowest of comparable metropolitan areas. The slower rebound in manufacturing has been offset by other industries such as education and healthcare. Single-family house price appreciation remains below the state and US averages. The area's weak migration along with expenses associated with retaining healthcare personnel are creating a challenge to replace burned out healthcare staff. Top employers, Allegheny Health and UPMC, reported first quarter losses, mainly due to higher costs from rising wages and expenses associated with temporary staffing. The Pittsburgh, PA MSA has evolved into an emerging tech hub. Autonomous driving companies such as Argo AI and Google's Waymo have established operations in the area, but growth in this sector will be limited as skilled workers are moving to other parts of the country. Recovery of office jobs lost during the pandemic ranks Pittsburgh near the bottom

in comparison to other metropolitan areas, which has caused the downtown area to struggle. Remote work is predicted to cause white-collar workers to live outside of the area, thus reducing consumer spending. The top employers include UPMC Health System, Highmark, Inc., University of Pittsburgh, and The PNC Financial Services Group Inc.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Pittsburgh, PA MSA was five percent as of January 2020. In April 2020, unemployment levels peaked at 15.8 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Pittsburgh, PA MSA was 4.1 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the Pittsburgh, PA MSA to better understand area credit and community needs. One contact worked for an organization associated with economic development and community development. The contact expressed a range of needs across the MSA including affordable housing but also pointed to the older housing stock in the city needing rehabilitation. Other contacts expressed local financial institutions need to offer more innovative products including small dollar loans. Down payment assistance with mortgage loans also arose during the discussion. One contact expressed that local financial institutions offer many products, but offering a free or low-cost checking account would appeal to clients this contact supported in the community. Many LMI individuals cannot afford the minimum balances banks require and end up paying account fees due to low balances. The contacts cited the following needs:

- Affordable housing
- Grants and/or loans for rehabilitation of aging housing stock and infrastructure
- Small dollar loans for businesses and individuals
- Down payment assistance for LMI borrowers
- No fee checking accounts with no minimum balance requirements

### **Scope of Evaluation in the State of Pennsylvania**

The Pittsburgh, PA MSA AA received a full-scope review.

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

### **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Pittsburgh MSA AA was excellent.

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market ranking as compared to their deposit market ranking.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full Scope</b>							
Pittsburgh MSA	5,689	4,233	75	157	10,154	85.43	87.8
<b>Limited Scope</b>							
Erie MSA	264	173	1	1	439	3.7	1.8
PA Non-MSA	879	392	10	11	1,292	10.87	10.4
<b>Total</b>	6,832	4,798	86	169	11,885	100.0	100.0
BSRA**				25	25		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\* BSRA- Broader Statewide Regional Area.

<b>Dollar Volume of Loans (\$000s)*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full Scope</b>							
Pittsburgh MSA	1,064,403	402,450	5,468	116,941	1,589,262	89.7	87.8
<b>Limited Scope</b>							
Erie MSA	32,235	17,420	21	5,000	54,676	3.1	1.8
PA Non-MSA	94,968	27,636	199	4,968	127,771	7.2	10.4
<b>Total</b>	1,191,606	447,506	5,688	126,909	1,771,709	100.0	100.0
BSRA**				291,121	291,121		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\* BSRA- Broader Statewide Regional Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 1.9 percent. The bank ranked ninth among 47 depository financial institutions placing it in the top 20 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 2.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked eighth among 722 home mortgage lenders in the AA, which placed it in the top two percent of lenders. The top three lenders with a combined market share of 19.4 percent were CBNA with 7.7 percent, PNC Bank, National Association with 6.5 percent, and Rocket Mortgage with 5.2 percent.

According to peer small business data for 2021, the bank had a market share of 2.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked tenth among 194 small business lenders in the AA, which placed it in the top six percent of lenders. The top three lenders with a combined market share of 41.11 percent were PNC Bank, National Association with 19.2 percent, American Express National Bank with 14.3 percent, and JPMorgan Chase Bank, National Association with 7.7 percent.

According to peer small farm data for 2021, the bank had a market share of 7.4 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth among 23 farm lenders in the AA, which placed it in the top 18 percent of lenders. The top three lenders with a combined



market share of 40.3 percent were Wells Fargo Bank, National Association. with 18.5 percent, JPMorgan Chase Bank, National Association with 13.9 percent, and John Deere FNCL FSB with 7.9 percent.

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

The bank exhibited a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Pennsylvania 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

#### ***2020-21***

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table Q in the state of Pennsylvania 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

#### ***2020-21***

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies but approximated the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### ***Small Farm Loans***

Refer to Table S in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small farm loans was good.

#### ***2020-2021***

The bank did not originate any small loans to farms in low-income geographies. The percentage of small farm loans in low-income geographies was significantly below both the percentage of the farms in those geographies and the aggregate distribution of small farm loans. The percentage of small farm loans in moderate-income geographies exceeded both the percentage of the farms in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank did not originate or purchase a sufficient number of small farm loans in 2022 to perform a meaningful analysis.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

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

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

#### ***2020-21***

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Loans to Businesses***

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

*2020-21*

The bank did not collect or consider the gross annual revenues in the underwriting of 8.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

***Small Farm Loans***

Refer to Table T in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's small farm loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small farm loans was good.

*2020-2021*

The bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms in those geographies but exceeded the aggregate distribution of small farm loans.

*2022*

The bank did not originate or purchase a sufficient number of small farm loans in 2022 to conduct a meaningful analysis.

**Community Development Lending**

The institution was a leader in making CD loans. CD lending further supported the overall excellent Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 157 CD loans totaling \$116.9 million, which represented 26.6 percent of the allocated tier 1 capital. CD loans primarily supported community services to LMI individuals and/ economic development efforts. By dollar volume, 1.9 percent of these loans funded affordable housing, 42.7 percent funded economic development, 15.8 percent funded revitalization and stabilization efforts, and 39.6 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- HNB renewed an existing \$2 million working capital revolving line of credit for three years for a nonprofit organization that provides a wide variety of social services for at-risk children and young adults in the Pittsburgh MSA. Services include foster care, workforce development, housing, independent living and transitional-age youth programs, in-home intervention, drug and alcohol and mental health programs, education, residential care, and emergency shelter. The loan is responsive to the identified needs of community services for LMI individuals.
- HNB purchased participations in three bridge loans, which supported the creation of 111 units of affordable housing. These bridge loans are associated with equity investments in LIHTCs and benefit numerous projects across multiple states, including the AA. Of the total bridge loans, \$1.5 million were allocated among three affordable housing projects in the Pittsburgh MSA. These projects include the following: \$312,423 to finance 25 homes in a lease-to purchase program, \$390,000 to construct a new 42-unit affordable housing development, and \$884,304 to construct 44 new affordable housing units. These loans are responsive to identified affordable housing needs.
- HNB made a \$1.6 million loan to finance the purchase of a new warehouse/industrial building located in a moderate-income geography. This manufacturing company employees LMI individuals. This loan will help maintain employment opportunities in the moderate-income geography.

### *Broader Statewide and Regional Lending*

HNB originated 25 CD loans totaling \$291 million in the state of Pennsylvania with a purpose mandate or function to serve the bank's AAs. As HNB has been responsive to community development needs in the AA, positive consideration was given to these CD loans within the BSRA. Lending in the BSRA further supports the overall Outstanding Lending Test rating in the state of Pennsylvania.

### **Product Innovation and Flexibility**

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 577 loans totaling \$23.3 million under its flexible lending programs. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	82	\$10,114
Debt Manager	227	\$3,608
Port - 30 Year Fixed - CAM CRA	46	\$3,813
Port - 30 Year Fixed - Hometown Mortgage	2	\$147

Unsecured HI	180	\$3,023
Lift Local – Small Business	40	\$2,451
<b>Total</b>	<b>577</b>	<b>\$23,156</b>

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Erie MSA and the PA Non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The institution's performance under the Investment Test in Pennsylvania is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

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

## Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments, donations, and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Scope</b>										
Pittsburgh MSA	98	6,097	127	21,940	225	89.6	28,037	66.0	9	15,956
<b>Limited-Scope</b>										
Erie MSA	3	348	5	3,284	8	3.2	3,632	8.5	1	1,290
PA Non-MSA	4	56	3	8,005	7	2.8	8,061	19.0	1	2,156
BSRA***	8	648	3	2,116	11	4.3	2,764	6.5	4	161
<b>Total</b>	<b>113</b>	<b>7,150</b>	<b>138</b>	<b>35,345</b>	<b>251</b>	<b>100.0</b>	<b>42,494</b>	<b>100.0</b>	<b>15</b>	<b>19,563</b>

\* 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.

\*\*\*BSRA-Broader Statewide Regional Area.

The bank made 127 investments totaling \$22 million during the evaluation period, which includes 120 qualifying grants and donations totaling \$1.2 million to approximately 57 organizations. The dollar volume of current and prior period investments represented 6.4 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 86.8 percent of investments supported affordable housing, 6.6

percent funded community services to LMI individuals, and 6.7 percent supported economic development. The institution occasionally uses innovative and/or complex investments to support CD initiatives. The bank made six LIHTC fund investments totaling \$19.7 million.

Examples of CD investments in the AA include:

- The bank invested \$12.7 million in a LIHTC-eligible development fund. The development will provide 46 units of affordable housing to seniors aged 62 and over.
- The bank invested \$3.6 million in a LIHTC-eligible development fund. The investment will fund the construction of five townhomes that will provide 33 affordable housing units.
- HNB donated \$80,000 to an organization that focuses on educating and serving entrepreneurs in Western Pennsylvania through offering education, consulting, and networking services. This organization focuses on economic development through providing support for small startup businesses.

#### *Broader Statewide and Regional Investments*

HNB made three investments totaling \$2.1 million that benefited the broader state regional area whose purpose, mandate, or function included serving HNB's AA. These investments funded several LIHTC-eligible affordable housing initiatives within the state of Pennsylvania. Eight prior period investments totaling \$648,000 related to prior LIHTC-eligible affordable housing initiatives that benefited the broader statewide and regional area remained outstanding at the end of the evaluation period. These investments further supported the overall Outstanding Investment Test rating for the state of Pennsylvania.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in both the Erie MSA and Pennsylvania Combined Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area.

### **SERVICE TEST**

The bank's performance under the Service Test in the state of Pennsylvania is rated High Satisfactory. Performance in the limited-scope AAs had minimal impact on the overall state conclusion.

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

Based on a full-scope review, the bank's performance in the Pittsburgh MSA was good.

### **Retail Banking Services**

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full Scope</b>													
Pittsburgh MSA	87.8	37	84.1	0	21.6	37.8	37.8	2.7	5.2	17.7	43.3	33.0	0
<b>Limited Scope</b>													
Erie MSA	1.8	2	4.5	0	50	0	50	0	8.1	18.9	41.0	30.2	0
PA Non-MSA	10.4	5	11.4	40	20	20	20	0	7.2	13.9	56.1	22.8	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100.0 percent due to rounding.

HNB's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. The bank did not operate any branches in low-income geographies. The OCC gave positive consideration for 12 branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, three were located within 1,000 feet of an LMI geography, and the remaining nine serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this report. This had a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 15 ATMs in the AA, all of which were deposit-taking. HNB provided data that indicated 76.3 percent of customers in LMI geographies used the bank's mobile application or accessed online banking during the fourth quarter of 2022. This was an increase of 34.2 percent for customers in LMI geographies since the first quarter of 2020.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full Scope</b>							
Pittsburgh MSA	4	2	0	0	0	1	1
<b>Limited Scope</b>							
Erie MSA	0	0	0	0	0	0	0
PA Non-MSA	0	1	0	0	0	-1	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed two branches, neither of which were in LMI geographies. The branch closures were a result of branch consolidation. HNB also opened four branches during the evaluation period, none of which were in LMI geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

The bank operated 37 branches in the Pittsburgh MSA. Of these, 35 were traditional branches, one was a remote drive-thru branch, and one was a Smart Branch. For the traditional branches, 28 branches operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday and 9:00 a.m. to 5:00 p.m. on Fridays while seven operated from 9:00 a.m. to 5:00 p.m., Monday through Friday. In total, 25 traditional branches, including five in moderate-income geographies, operated on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at 26 of the traditional branches, including four located in moderate-income geographies, and maintained the same hours as the branch. The remote drive-thru branch operated 9:00 a.m. to 4:00 p.m., Monday through Thursday, 9:00 a.m. to 5:00 p.m. on Fridays and 9:00 a.m. to 12:00 p.m. on Saturdays. The Smart Branch operated 9:00 a.m. to 5:00 p.m., Monday through Friday.

### **Community Development Services**

The institution provides an adequate level of CD services.

HNB employees provided 233 qualified CD service activities to 36 organizations with 803 qualified hours within this AA during the evaluation period. Leadership is evident through board participation in 124 of these activities with 12 bank employees providing 403 service hours to 18 organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 222 service activities and 785 service hours.

Service activity examples during the evaluation period include:

- One HNB employee served on the board of directors and various committees for a non-profit, HUD-approved housing counseling agency. This organization provides various homeownership services to LMI households, ranging from homebuyer education to foreclosure prevention. Service totaled 90 hours across the evaluation period.
- Four HNB employees provided over 20 hours of small business development training in cooperation with an organization that supports entrepreneurs and minority- and women-owned businesses by providing education, information, and tools necessary to build successful businesses. These employees facilitated small business education to the minority and women business owners.
- One HNB employee volunteered on the board of directors of a nonprofit organization that helps businesses in western PA succeed through loans, grants, and tax credits. The organization provides low-cost alternative loans for small businesses that do not qualify for traditional financing, allowing for the creation of new jobs. Other projects funded by the organization include land and building acquisition, renovations and infrastructure improvements, purchase of machinery and equipment, as well as building inventory and working capital. Service totaled 14.5 hours across the evaluation period.

### **Conclusions for Areas Receiving Limited-Scope Review**

Based on a limited-scope reviews, the bank's performance under the Service Test in the Erie MSA and Pennsylvania Combined Non-MSA AA is stronger than the bank's overall performance under the



Service Test in the full-scope area. Stronger performance was due to more readily accessible service delivery systems in low-income geographies. Stronger performance did not impact the overall state Service Test rating.

## State of South Dakota

**CRA rating for the state of South Dakota:** Satisfactory

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

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Needs to Improve

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate, and borrower distribution of lending was adequate.
- The bank made no CD loans during the evaluation period, which had a neutral effect on the Lending Test rating.
- Qualified investments were effective in addressing community credit needs. The bank made a good level of qualified investments, grants, and donations.
- Service delivery systems were unreasonably inaccessible to portions of the AA, and the bank did not provide any CD services.

## Description of Institution's Operations in South Dakota

HNB delineated a single AA in South Dakota consisting of the Sioux Falls, SD MSA (Sioux Falls MSA). South Dakota was HNB's smallest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

### Sioux Falls MSA AA

HNB had no deposits in the Sioux Falls MSA, representing zero percent of the bank's total deposits, as of June 30, 2022. As of December 31, 2022, the bank did not operate any branches or ATMs in the AA due to leaving the market in early 2022. The bank originated and purchased approximately \$11.7 million in home mortgage and small business loans within the Sioux Falls MSA representing less than 0.1 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 25 FDIC-insured institutions operated branches in the AA. HNB did not have any deposit market share. The top three banks by deposit market share were Well Fargo Bank, National Association with 96.2 percent, First Premier Bank with 1.2 percent, and The First National Bank in Sioux Falls with 0.5 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Sioux Falls MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Sioux Falls MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.0	40.5	42.9	16.7	0.0
Population by Geography	178,942	0.0	37.7	45.5	16.8	0.0
Housing Units by Geography	74,752	0.0	41.0	43.4	15.6	0.0
Owner-Occupied Units by Geography	44,644	0.0	28.3	50.6	21.1	0.0
Occupied Rental Units by Geography	25,496	0.0	61.3	32.2	6.4	0.0
Vacant Units by Geography	4,612	0.0	50.8	35.4	13.8	0.0
Businesses by Geography	20,992	0.0	49.5	34.3	16.2	0.0
Farms by Geography	861	0.0	16.7	59.3	23.9	0.0
Family Distribution by Income Level	44,325	21.0	19.3	24.2	35.5	0.0
Household Distribution by Income Level	70,140	24.1	19.1	19.2	37.6	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$72,948	Median Housing Value			\$148,825
			Median Gross Rent			\$716
			Families Below Poverty Level			8.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Sioux Falls MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	4.3	31.9	44.7	17.0	2.1
Population by Geography	197,214	2.5	29.9	46.7	20.2	0.7
Housing Units by Geography	83,607	3.8	31.8	46.0	17.1	1.3
Owner-Occupied Units by Geography	49,221	1.5	23.9	51.0	23.6	0.0
Occupied Rental Units by Geography	29,232	7.4	41.6	39.0	8.2	3.8
Vacant Units by Geography	5,154	5.2	51.1	37.6	6.1	0.0
Businesses by Geography	26,084	13.3	31.9	36.1	15.1	3.7
Farms by Geography	963	4.3	13.9	62.1	19.2	0.5
Family Distribution by Income Level	47,613	20.4	18.7	24.6	36.3	0.0
Household Distribution by Income Level	78,453	24.1	18.1	19.5	38.3	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$84,874	Median Housing Value			\$191,820
			Median Gross Rent			\$807
			Families Below Poverty Level			6.1%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Sioux Falls MSA was \$72,948. Based on this information, low-income families earned less than \$36,474 and moderate-income families earned less than \$58,358. The median housing value in the AA is \$148,825. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$912 for a low-income borrower and \$1,459 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$799. Housing is generally affordable for low- and moderate-income borrowers in the Sioux Falls MSA.

Based on 2020 census data, housing became less affordable for low- and moderate-income borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 236.7 and by the fourth quarter of 2022 had increased to 329.2, representing a 39.1 percent increase in home prices across the evaluation period. This acceleration in home prices creates affordability concerns in an area that has generally been affordable for low-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Sioux Falls MSA, the percentage of families living below the poverty level was 8.5 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, financial, manufacturing, retail trade, and health services were all contributors to growth and are important economic drivers of the economy. Non-farm payrolls are ahead of pre-pandemic levels and outperforming most Midwest metro areas. However, financial services have declined in payrolls throughout the year, and interest rate hikes will further slow hiring in the financial field. Healthcare employment is expected to expand faster than the US and state averages. The recovery rate for jobs is among the ten fastest in the Midwest, and house price appreciation is strong. Population growth continues to be a primary driver of the Sioux Falls MSA's success. People are attracted to the area because of its natural amenities, low tax burden, and job opportunities. This will increase the need for jobs in construction, leisure/hospitality, and retail trade. The top employers include Sanford Health, Avera Health, Smithfield Foods, and Hy-vee Inc.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Sioux Falls, SD MSA was 2.5 percent as of January 2020. In April 2020, unemployment levels peaked at 8.4 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for the Sioux Falls, SD MSA was 1.9 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

## Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts completed during the evaluation period within the Sioux Falls, SD MSA to better understand area credit and community needs. One contact worked for an organization associated with the farming industry, while the other worked in economic development for small businesses. The contact associated with the farming industry stressed the importance of the farming industry on the greater Sioux Falls area and how weather plays a major role in the success of the industry. The other contact described population growth in Minnehaha County and how the Covid-19 pandemic only had a limited economic effect on the MSA. This can be seen from a continued rise in sales tax receipts, growing since the summer of 2020. The influx of new business and expansion of current businesses has led to labor shortages in the MSA. Housing supply, at all price points, is minimal. The contacts cited the following needs:

- Affordable housing
- Development of affordable housing
- Loans for small business start-ups and manufacturing companies
- Agricultural loans

## **Scope of Evaluation in South Dakota**

The Sioux Falls MSA AA received a full-scope review as it was the only AA within the state of South Dakota.

HNB did not originate a sufficient volume of home mortgages or small loans to farms in the AA to conduct meaningful analyses. Lending test conclusions are based solely on performance originating or purchasing small loans to businesses.

When drawing conclusions, examiners considered the bank's limited time operating within the AA. HNB only operated in the Sioux Falls MSA for seven months of the 36-month evaluation period.

Because HNB did not operate in Sioux Falls in June 2022, examiners used deposit volume as of June 30, 2021, to allocate capital for the purpose of assessing CD Lending and Investment Test performance.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA**

### **LENDING TEST**

The bank's performance under the Lending Test in South Dakota is rated Low Satisfactory.

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

Based on a full-scope review, the bank's performance in the Sioux Falls AA was adequate.

### **Lending Activity**

Lending levels reflected adequate responsiveness to AA credit needs when considering HNB's lending market rank as compared to their deposit market rank.

<b>Number of Loans</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full Scope</b>							
Sioux Falls	10	48	3	0	61	100.0	0.00
<b>Total</b>	<b>10</b>	<b>48</b>	<b>3</b>	<b>0</b>	<b>61</b>	<b>100.0</b>	<b>0.00</b>

<b>Dollar Volume of Loans (000s)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full Scope</b>							
Sioux Falls	4,380	7,231	121	0	11,732	100.0	0.00
<b>Total</b>	<b>4,380</b>	<b>7,231</b>	<b>121</b>	<b>0</b>	<b>11,732</b>	<b>100.0</b>	<b>0.00</b>

According to FDIC deposit data as of June 30, 2022, the bank did not have any deposit market share due to exiting the market.

According to peer small business data for 2021, the bank had a market share of 0.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked 26<sup>th</sup> among 91 small business lenders in the AA, which placed it in the top 29 percent of lenders. The top three lenders with a combined market share of 32.7 percent were First National Bank in Sioux Falls with 16.2 percent, First Premier Bank with 8.4 percent, and First Dakota National Bank with 8.1 percent.

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

The bank exhibited an adequate geographic distribution of loans in its AA.

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

Refer to Table Q in the South Dakota 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

#### ***2020-2021***

The percentage of small business loans in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank did not make a sufficient volume of small business loans in 2022 to draw a meaningful conclusion.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

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

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

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

Refer to Table R in the South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

#### ***2020-2021***

The bank did not collect or consider the gross annual revenues in the underwriting of 3.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but approximated the aggregate distribution of loans.

#### ***2022***

The bank did not make a sufficient volume of loans in 2022 to draw a meaningful conclusion.

### **Community Development Lending**

The bank made few, if any, CD Loans.

HNB did not originate any CD loans during the evaluation period. CD lending had a neutral impact on the overall Lending Test conclusion when considering the limited number of months the bank operated within the AA.

### **Product Innovation and Flexibility**

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

## INVESTMENT TEST

The institution's performance under the Investment Test in South Dakota is rated High Satisfactory.

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

Based on a full-scope review, the bank's performance in the Sioux Falls MSA is good.

#### Number and Amount of Qualified Investments

The institution has a significant level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The volume of qualified investments and donations was considered in the context of the bank's limited time operating within the AA during the evaluation period.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Scope</b>										
Sioux Falls MSA	0	0	1	30	1	100	30	100	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>30</b>	<b>1</b>	<b>100</b>	<b>30</b>	<b>100</b>	<b>0</b>	<b>0</b>

\* 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.

The bank made one donation totaling \$30,000 during the evaluation period to one organization. The dollar volume of current- and prior- period investments represented 5.3 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and community economic development needs. By dollar volume, 100 percent funded community services to LMI individuals. The institution does not use innovative or complex investments to support CD initiatives.

The CD investment in the AA during the performance period includes:

- The bank donated \$30,000 to an organization that focuses on providing safe housing, counseling, medical assistance, transportation, and other supportive services to human trafficking victims.

## SERVICE TEST

The bank's performance under the Service Test in South Dakota is rated Needs to Improve.

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

Based on a full-scope review, the bank's performance in the Sioux Falls MSA was poor.



## Retail Banking Services

Delivery systems are unreasonably inaccessible to portions of the AA particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope													
Sioux Falls MSA	0	0	0	0	0	0	0	0	0	37.7	45.5	16.8	0

The NA category consists of geographies that have not been assigned an income classification.

The bank did not operate any branches or ATMs in the AA at the end of the evaluation period.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope							
Sioux Falls MSA	0	1	0	0	0	0	-1

The NA category consists of geographies that have not been assigned an income classification.

The institution's opening and closing of branches have significantly adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

During the evaluation period, the bank closed the only branch that operated within the AA and fully exited operations in the state. The branch was acquired as part of the TCF merger, and operations ceased once the local corporate functions were migrated to HNB's headquarters in Columbus.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals.

## Community Development Services

The institution provides few, if any, CD services. HNB did not provide any CD services in the Sioux Falls MSA during the seven months in which the bank operated within the AA.

## State of West Virginia

**CRA rating for the state of West Virginia:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made a good, level of qualified investments, grants, and donations.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs, and the bank provided a relatively high number of CD services. Performance in the limited-scope AAs had a negative effect on the overall state Service Test rating.

## Description of Institution's Operations in West Virginia

HNB delineated five AAs within the state of West Virginia. These AAs consisted of the Charleston, WV MSA, the Huntington-Ashland, WV-KY-OH MSA, the Morgantown, WV MSA, the Parkersburg-Vienna, WV MSA, and five non-MSA counties evaluated as the WV Non-MSA AA. West Virginia was HNB's ninth largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$2.3 billion in deposits in West Virginia representing 1.6 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 25 branches and 33 ATMs, of which 28 were deposit-taking, within the rating area, representing 2.3 percent of total bank branches and 1.7 percent of total ATMs. The bank originated and purchased approximately \$653.7 million in home mortgage and \$191 million in small business loans within West Virginia representing 1.2 percent of total bank loan originations and purchases.

### West Virginia Non-MSA AA

HNB had \$720 million in deposits in the WV Non-MSA AA, representing 0.5 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 10 branches and 13 ATMs, of which nine were deposit taking, representing 0.9 percent of total branches and 0.7 percent of total ATMs. The bank originated and purchased approximately \$282.6 million in home mortgage and small business loans within the West Virginia Combined Non-MSA representing 0.6 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 23 FDIC-insured institutions operated 66 branches in the AA. The top three banks by deposit market share were MVB Bank, Inc. with 15.9 percent, Truist Bank with 15.6 percent, and HNB with 15.5 percent. In

addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the West Virginia Combined Non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: West Virginia Combined Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	1.8	9.1	58.2	30.9	0.0
Population by Geography	181,727	0.8	7.5	57.5	34.2	0.0
Housing Units by Geography	85,815	1.0	7.1	59.8	32.2	0.0
Owner-Occupied Units by Geography	53,616	0.2	5.8	58.6	35.4	0.0
Occupied Rental Units by Geography	18,398	3.3	10.0	55.7	31.1	0.0
Vacant Units by Geography	13,801	0.9	8.0	69.7	21.3	0.0
Businesses by Geography	12,657	2.1	6.9	51.8	39.2	0.0
Farms by Geography	452	0.2	3.3	62.4	34.1	0.0
Family Distribution by Income Level	47,158	18.7	16.0	19.5	45.8	0.0
Household Distribution by Income Level	72,014	21.8	15.5	16.5	46.2	0.0
Median Family Income Non-MSAs – WV		\$48,107	Median Housing Value			\$102,031
			Median Gross Rent			\$635
			Families Below Poverty Level			12.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: West Virginia Combined Non-MSA</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)	61	1.6	9.8	45.9	42.6	0.0
Population by Geography	175,535	0.6	10.1	47.3	42.0	0.0
Housing Units by Geography	86,256	0.9	9.9	49.2	39.9	0.0
Owner-Occupied Units by Geography	53,137	0.2	7.9	46.6	45.3	0.0
Occupied Rental Units by Geography	18,719	2.5	16.6	47.5	33.3	0.0
Vacant Units by Geography	14,400	1.6	8.8	61.0	28.7	0.0
Businesses by Geography	14,173	1.9	12.5	44.3	41.3	0.0
Farms by Geography	495	0.2	6.5	46.3	47.1	0.0
Family Distribution by Income Level	46,186	16.8	15.2	18.8	49.2	0.0
Household Distribution by Income Level	71,856	21.0	14.0	16.5	48.4	0.0

Median Family Income Non-MSAs – WV	\$55,205	Median Housing Value	\$123,022
		Median Gross Rent	\$710
		Families Below Poverty Level	10.0%
<i>Source: 2020 U.S. Census and 2022 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>			

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the WV Combined Non-MSA AA was \$48,107. Based on this information, low-income families earned less than \$24,054 and moderate-income families earned less than \$38,486. The median housing value in the AA is \$102,031. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$601 for a low-income borrower and \$962 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$548. Housing is generally affordable for low- and moderate-income borrowers in the WV Combined Non-MSA AA.

Based on 2020 census data, housing remained generally affordable for low- and moderate-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the WV Combined Non-MSA AA, the percentage of families living below the poverty level, according to the 2015 ACS, was 12.6 percent.

### Economic Data

For the West Virginia Non-Metro area, the following information is derived from the West Virginia Economic Outlook 2021-2025, published by the Bureau of Business & Economic Research from the John Chambers College of Business & Economics at West Virginia University. According to the West Virginia Economic Outlook 2021-2025, energy, education, manufacturing, and leisure and hospitality were all contributors to growth and are important economic drivers of the economy. By August 2020, over half of the 94,000 jobs lost between mid-March and mid-April 2020 due to the economic shutdowns resulting from the pandemic were recouped. However, data suggests the state's employment rate of recovery likely peaked during the initial re-opening period in mid-2020 and will slow in the future. Natural gas and coal are key drivers of the state's economy, making up almost one third of total gross state product. While the state's coal industry has faced headwinds with several notable companies filing for bankruptcy, the natural gas industry has enjoyed strong gains. The state's population is projected to be relatively stable. The largest employers in the region include West Virginia University, Huntington Alloy Corporation, Ogden Newspapers, and Hollywood Casino.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the five West Virginia non-metro counties of Harrison, Lewis, Marion, Randolph, and Ritchie were 5.5, 8.4, 5.5, 7.3, and 7.5 percent, respectively, as of January 2020. In April 2020, unemployment levels for these

counties peaked at 15.1, 18.1, 17.2, 17.1, and 12.7 percent for the respective counties due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally adjusted unemployment rate for each of the West Virginia non-metro counties was 3.1, 4.2, 3.6, 4.2, and 4.1 percent, respectively, as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts completed during the evaluation period within the West Virginia Combined Non-MSA to better understand area credit and community needs. Two contacts worked for organizations focused on community and economic development, while the other focused on affordable housing, rental assistance, and homeownership counseling. Contacts described high poverty levels throughout the AA and a lack of affordable housing for this population. One contact described that the workforce participation rate is lower than the national average. Many individuals may want to work but do not have the skills or education required for jobs in the area. One contact indicated that HNB has been a strong partner in the AA. HNB provided support through donations for housing counseling programs, financial literacy presentations, development of a new mortgage loan product, and bank employee volunteerism by serving on boards of directors. The contacts cited the following needs:

- Affordable housing
- Rehabilitation loans for older properties
- Renovation of abandoned or dilapidated properties into affordable housing, potentially through the usage of tax credits
- Technical assistance to small businesses
- Working capital for small businesses
- Loans for commercial equipment for small businesses
- Financial education workshops
- Flexible lending options for mortgage loans
- First time homebuyer mortgages
- Grants for single family residence down payment assistance

### **Scope of Evaluation in West Virginia**

The WV Non-MSA AA received a full-scope review. The review did not include small loans to farms as HNB originated an insufficient number of small loans to farms to perform a meaningful analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA**

### **LENDING TEST**

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

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

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

## Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market ranks as compared to their deposit market rank.

<b>Number of Loans</b>							
Assessment Area*	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full Scope</b>							
WV Non-MSA	1,360	609	14	22	2,005	33.3	30.7
<b>Limited Scope</b>							
Charleston MSA	578	526	14	22	1,140	19.0	28.6
Huntington MSA	645	497	9	14	1,165	19.4	10.5
Morgantown MSA	947	295	8	9	1,259	20.9	25.0
Parkersburg MSA	309	133	1	3	446	7.4	5.2
<b>Total</b>	<b>3,839</b>	<b>2,060</b>	<b>46</b>	<b>70</b>	<b>6,015</b>	<b>100.0</b>	<b>100.0</b>
BSRA				11	11		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\* BSRA- Broader Statewide Regional Area.

<b>Dollar Volume of Loans (\$000s)</b>							
Assessment Area*	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<b>Full Scope</b>							
WV Non-MSA	187,308	54,706	1,406	39,137	282,557	29.5	30.7
<b>Limited Scope</b>							
Charleston MSA	90,464	55,448	1,585	24,802	172,299	17.9	28.6
Huntington MSA	98,375	46,805	724	6,558	152,462	15.9	10.5
Morgantown MSA	231,342	20,731	352	32,943	285,368	29.8	25.0
Parkersburg MSA	46,232	13,358	42	6,570	66,202	6.9	5.2
<b>Total</b>	<b>653,721</b>	<b>191,048</b>	<b>4,109</b>	<b>110,010</b>	<b>958,888</b>	<b>100.0</b>	<b>100.0</b>
BSRA**				19,011			

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*BSRA-Broader Statewide Regional Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 15.5 percent. The bank ranked third among 23 depository financial institutions placing it in the top 14 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 11.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked first among 208 home mortgage lenders in the AA. The top two other lenders with a combined market share of 15 percent were Rocket Mortgage with 10.1 percent and WesBanco Bank, Inc. with 4.9 percent.

According to peer small business data for 2021, the bank had a market share of 8.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 75 small business lenders in the AA, which placed it in the top three percent of lenders. The top two other lenders with a combined market share of 20.2 percent were American Express National Bank with 12.2 percent and JPMorgan Chase Bank, National Association with 8 percent.

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

The bank exhibited an adequate geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the West Virginia 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

#### ***2020-21***

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in those geographies and was significantly below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was weaker than the performance in 2020-2021 due to a worse distribution of loans in low-income geographies.

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

Refer to Table Q in the West Virginia 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

#### ***2020-21***

The bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify

any conspicuous or unexplained gaps in lending.

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

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

#### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

*2020-21*

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families but exceeded the aggregate distribution of loans.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table R in the West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

*2020-21*

The bank did not collect or consider the gross annual revenues in the underwriting of 9.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

*2022*

The bank's performance in 2022 was consistent with the performance in 2020-2021.



## Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 22 CD loans totaling \$39.1 million, which represented 52.7 percent of the allocated tier 1 capital. CD loans primarily supported community services to LMI individuals and revitalization and stabilization efforts. By dollar volume, 13.2 percent funded economic development, 74 percent funded revitalization and stabilization efforts, and 12.8 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- HNB made a \$19.1 million loan to finance the construction of a new airport hangar and the purchase and improvement of an existing airport hangar. This financing will promote job creation and retention for the region, including a nearby Opportunity Zone and LMI areas. This loan is responsive to the identified needs of revitalization and stabilization for the AA.
- HNB made a \$4 million loan to finance the construction of a large residential substance abuse complex. This larger complex will provide expanded services for primarily LMI individuals. Approximately 90 percent of the treatment facility revenues are from Medicaid. This new facility will create more than 50 new jobs. This loan is responsive to the identified needs of community services for LMI individuals.
- HNB made a \$1.9 million loan to finance the purchase of an existing restaurant. This loan will help the business retain 20 jobs for LMI individuals. These jobs include cooks, wait staff, and general restaurant laborers. This loan is responsive to identified needs for small business financing and job retention for LMI individuals.

### *Broader Statewide Regional Area CD Loans*

Because HNB was responsive to community development needs in its AAs, the OCC also considered CD loans in the BSRA that did not have a purpose, mandate, or function to serve the bank's AAs. HNB originated 11 CD loans totaling \$19 million in the BSRA, which did not fund projects with a purpose, mandate, or function to serve the bank's AAs. CD lending in the BSRA further supported the excellent Lending Test rating in the state of West Virginia.

## Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 302 loans under its flexible lending programs totaling \$16.3 million. Refer to the comment in the Flexible Lending Programs and other Lending information

section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	9	\$396
Debt Manager	57	\$808
Port - 30 Year Fixed - CAM CRA	1	\$109
Unsecured HI	119	\$1,756
WV HDF - All Products	114	\$13,158
Lift Local – Small Business	2	\$81
<b>Total</b>	<b>302</b>	<b>\$16,308</b>

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Charleston MSA AA and the Morgantown MSA AA are consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the Huntington-Ashland MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope-area due to worse borrower income distribution. The bank's lending performance in the Parkersburg MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope area due to worse geographic distribution. Weaker performance in the limited-scope AAs did not impact the overall Lending Test rating in the state of West Virginia.

Refer to Tables O through T in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The institution's performance under the Investment Test in West Virginia is rated High Satisfactory. Performance in the limited-scope AAs positively affected the overall Investment Test rating.

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

Based on a full-scope review, the bank's performance in the West Virginia Combined Non-MSA is poor.

### **Number and Amount of Qualified Investments**

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope:</b>										
WV Non-MSA	3	1,157	9	64	12	14.5	1,220	3.0	2	794
<b>Limited-Scope:</b>										
Charleston MSA	2	1,868	27	33,165	29	34.9	35,033	85.8	0	0
Huntington MSA	3	349	18	970	21	25.3	1,318	3.2	3	692
Parkersburg MSA	4	1,226	7	76	11	13.3	1,302	3.2	4	333
Morgantown MSA	2	1,508	8	446	10	12.0	1,954	4.8	0	0
<b>Total</b>	<b>14</b>	<b>6,108</b>	<b>69</b>	<b>34,719</b>	<b>83</b>	<b>100.0</b>	<b>40,827</b>	<b>100.0</b>	<b>9</b>	<b>1,819</b>

\* 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.

The bank made nine donations totaling \$64,000 during the evaluation period. Three prior period investments totaled \$1.2 million. The dollar volume of current- and prior- period investments represented 1.6 percent of allocated tier 1 capital.

The institution exhibited adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- The bank made a \$10,000 donation to a non-profit organization that hosts and supports the Internal Revenue Service's Volunteer Income Tax Assistance program (VITA). The VITA program uses certified volunteers to prepare tax returns for LMI individuals and families.
- The bank made a \$25,000 grant to a non-profit organization that provides homebuyer education courses to LMI individuals and families. The courses include both pre-purchase and post-purchase classes. The organization is a HUD Certified Counseling Agency, and 67 percent of clients assisted by the program are LMI.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Charleston MSA, Huntington-Ashland MSA, Morgantown MSA, and Parkersburg MSA is stronger than the bank's overall performance under the Investment Test in the full-scope areas due to a much higher volume of qualified investments. Performance in the limited scope AAs had a positive impact on the Investment Test rating.

## SERVICE TEST

The bank's performance under the Service Test in West Virginia is rated High Satisfactory. Performance in the limited-scope areas had a negative impact on the overall state rating.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the WV Non-MSA AA was excellent.

### Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope													
WV Non-MSA	30.7	10	40	10	40	30	20	0	0.6	10.1	47.3	42	0
Limited Scope													
Charleston MSA	28.6	5	20	0	20	40	40	0	0.7	12	58.1	26.6	0
Huntington MSA	10.5	3	12	33.3	0	33.3	33.3	0	7.9	14.3	39.3	38.5	0
Morgantown MSA	25	6	24	0	16.7	33.3	16.7	33.3	3.2	12.3	49.6	30.7	0
Parkersburg MSA	5.2	1	4	0	100	0	0	0	0	22	44.5	33.6	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The NA category consists of geographies that have not been assigned an income classification.

Totals may not equal 100 percent due to rounding.

HNB's distribution of branches in low-income and moderate-income geographies exceeded the percentage of the population living within those geographies.

HNB offered several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 13 ATMs in the AA, nine of which were deposit-taking. HNB provided data that indicated 77.9 percent of customers in LMI geographies used the bank's mobile application or accessed online banking during the fourth quarter of 2022. This was an increase of 32.6 percent for customers in LMI geographies since the first quarter of 2020. ADS usage had a positive impact on the service delivery system rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope							
WV Non-MSA	0	0	0	0	0	0	0
Limited Scope							
Charleston MSA	0	1	0	0	-1	0	0
Huntington MSA	0	1	0	0	-1	0	0
Morgantown MSA	0	1	0	-1	0	0	0
Parkersburg MSA	0	0	0	0	0	0	0

The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. The NA category consists of geographies that have not been assigned an income classification.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals.

The bank operated 10 branches in the WV Non-MSA AA. Of these, eight were traditional branches and two were remote drive-thru branches. The traditional branches operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and from 9:00 a.m. to 5:00 p.m. on Fridays. Three of the branches, one of which was in a moderate-income geography, operated on Saturdays from 9:00 a.m. to 12:00 p.m. The two remote drive-thru branches operated from 9:00 a.m. to 4:00 p.m., Monday through Thursday, and from 9:00 a.m. to 5:00 p.m. on Fridays. One of these remote drive-thru branches, located in a moderate-income geography, operated on Saturdays from 9:00 a.m. to 12:00 p.m.

## **Community Development Services**

The institution provides a relatively high level of CD services.

HNB employees provided 103 qualified CD service activities to seven organizations with 455 qualified hours within this AA during the evaluation period. Leadership is evident through Board participation in 51 of these activities with four bank employees providing 279 service hours to five organizations. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 102 service activities and 453 service hours.

Service activity examples during the evaluation period include:

- An HNB Assistant Vice President served on the board of an organization that provides emergency food, clothing, and household items to LMI residents. The demand increased during the pandemic. The HNB employee served as treasurer totaling 183 hours during the evaluation period.
- An HNB employee served on the board of an organization that promotes affordable housing for a total of 53 hours during the evaluation period. The non-profit provides homeownership counseling, financial education, and home loans in the assessment area. The employee also served on the executive and loan review committees.
- Two HNB employees served on the board of directors of an agency that advocates, conducts research, and fundraises for programming that benefits LMI residents. During the evaluation period, one of the employees served on the finance committee, while the other served on the full board, for a total of 29 hours.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Charleston MSA, Huntington MSA, Morgantown MSA and Parkersburg MSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance was due to less accessible service delivery systems in low- and/or moderate-income geographies. Performance in the limited-scope AAs had a negative impact on the state Service Test rating due to the bank's presence in those AAs.

## State of Wisconsin

**CRA rating for the state of Wisconsin:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distribution of lending and borrower distribution of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- Service delivery systems are readily accessible to geographies and individuals of different income levels, and the institution provides a relatively high level of CD services.

## Description of Institution's Operations in Wisconsin

HNB delineated two AAs within Wisconsin. These included the Milwaukee-Waukesha, WI MSA and the Racine, WI MSA. Wisconsin was HNB's eleventh largest rating area based on deposits. Refer to appendix A for the list of counties reviewed.

HNB had \$825.7 million in deposits in Wisconsin representing 0.6 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 13 branches and 16 ATMs, of which all were deposit-taking, within the rating area, representing 1.2 percent of total bank branches and 0.8 percent of total ATMs. The bank originated and purchased approximately \$160.1 million in home mortgage and \$57.2 million in small business loans within Wisconsin, representing 0.3 percent of total bank loan originations and purchases.

### Milwaukee MSA AA

HNB had \$733 million in deposits in the Milwaukee MSA, representing 0.5 percent of the bank's total deposits as of June 30, 2022. As of December 31, 2022, the bank operated 11 branches and 14 ATMs, of which all were deposit taking, representing one percent of total branches and 0.7 percent of total ATMs. The bank originated and purchased approximately \$211.9 million in home mortgage and small business loans within the Milwaukee MSA, representing 0.3 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2022, 41 FDIC-insured institutions operated 371 branches in the AA. HNB ranked 16<sup>th</sup> in deposit share, with 0.9 percent. The top three banks by deposit market share were U.S. Bank, National Association with 43.6 percent, BMO Harris Bank, National Association with 12.5 percent, and JPMorgan Chase Bank, National Association with 12 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following tables provide a summary of the demographic data, including housing, business, and economic information, for the Milwaukee AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Milwaukee MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	384	25.8	17.7	28.9	27.1	0.5
Population by Geography	1,349,812	19.4	17.3	29.7	33.6	0.0
Housing Units by Geography	579,579	18.6	17.5	31.5	32.3	0.0
Owner-Occupied Units by Geography	308,791	8.9	14.5	32.0	44.5	0.0
Occupied Rental Units by Geography	227,915	27.8	21.7	32.7	17.7	0.0
Vacant Units by Geography	42,873	39.6	16.9	21.2	22.3	0.0
Businesses by Geography	79,737	13.7	14.2	31.3	40.8	0.1
Farms by Geography	1,496	9.2	10.7	28.5	51.6	0.0
Family Distribution by Income Level	325,894	25.7	16.3	19.0	39.0	0.0
Household Distribution by Income Level	536,706	26.9	15.8	17.0	40.3	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$179,269
			Median Gross Rent			\$840
			Families Below Poverty Level			12.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Milwaukee MSA</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)	400	20.3	19.8	30.3	27.5	2.3
Population by Geography	1,346,467	15.0	18.2	32.0	33.6	1.2
Housing Units by Geography	586,013	14.8	18.7	33.6	31.8	1.1
Owner-Occupied Units by Geography	310,203	6.7	14.7	35.8	42.6	0.2
Occupied Rental Units by Geography	233,280	22.6	24.0	32.4	19.1	1.9
Vacant Units by Geography	42,530	30.9	19.3	24.6	22.1	3.0
Businesses by Geography	108,689	12.4	17.9	31.5	37.4	0.8
Farms by Geography	1,940	9.9	12.9	31.4	45.3	0.4
Family Distribution by Income Level	322,061	24.3	17.0	19.9	38.7	0.0
Household Distribution by Income Level	543,483	26.5	16.0	17.3	40.2	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$84,829	Median Housing Value			\$200,665
			Median Gross Rent			\$948
			Families Below Poverty Level			9.9%

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

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

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on 2015 ACS data, the median family income for the Milwaukee MSA was \$71,764. Based on this information, low-income families earned less than \$35,882 and moderate-income families earned less than \$57,411. The median housing value in the AA is \$179,269. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$897 for a low-income borrower and \$1,435 for a moderate-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$962. Low-income borrowers would be challenged to afford a mortgage loan in the Milwaukee MSA, while housing is generally affordable for moderate-income borrowers in the Milwaukee MSA.

Based on 2020 census data, housing affordability challenges persisted for low-income borrowers and became less affordable for moderate-income borrowers.

The OCC further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and a historically low interest rate environment not captured by census data. According to the FHFA, in the first quarter of 2020, the HPI index was 206.5, and by the fourth quarter of 2022 had increased to 271.4, representing a 31.4 percent increase in home prices across the evaluation period. This acceleration in home prices worsens existing affordability concerns in the MSA for low-income borrowers and creates additional affordability concerns in an area that has generally been affordable for moderate-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty level. In the Milwaukee MSA, the percentage of families living below the poverty level, according to the 2015 ACS, was 12.6 percent.

### Economic Data

According to Moody's Analytics, dated June 2022, manufacturing, financial, and health services contributed to growth and are important economic drivers of the economy. Home-building in the area has faded despite rising prices. Healthcare payrolls are expected to grow in the near term but may encounter difficulty to fill positions due to a scarcity of healthcare workers. Manufacturing has recouped less than half of the jobs pre-pandemic but is expected to grow with gains from the transition to renewable energy. Komatsu Mining recently opened a new office space and plant for mineral extraction demanded by electric cars and other renewable energy sectors. The largest employers include Aurora Health Care Inc., Froedtert Health, Ascension Wisconsin, and Quad Graphics Inc.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Milwaukee-Waukesha, WI MSA was 3.1 percent as of January 2020. In April 2020, unemployment levels peaked at 14.3 percent due to the impacts of the COVID-19 pandemic and associated lockdowns and business closures. Since that time, unemployment rates have declined, and the non-seasonally



adjusted unemployment rate for the Milwaukee-Waukesha, WI MSA was 2.3 percent as of December 2022. The national non-seasonally adjusted unemployment rate was 3.3 percent as of December 2022.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts and participated in a CRA conference completed during the evaluation period within the Milwaukee MSA to better understand area credit and community needs. The contacts worked for organizations focused on affordable housing, economic development, and redevelopment and revitalization in the Milwaukee MSA. The contacts cited the following needs:

- Affordable housing due to rising housing prices
- Flexible financing terms for affordable housing properties
- Small dollar loan products to individuals to decrease reliance on payday lenders
- Mortgage lending to LMI individuals
- Housing down payment assistance and/or closing cost grants
- Outreach, training, and counseling for LMI individuals regarding residential loan products
- Sponsorship and grants for workforce development programs
- Mentorship of high-school students on careers in the Milwaukee area, including manufacturing and trades
- Participation in New Market Tax Credits and Historic Tax Credits, on both the debt and equity sides
- Investments in designated Opportunity Zones
- Financial education literacy classes for all age groups and populations (students, individuals in the workforce, and retirees)
- Homeownership counseling classes

### **Scope of Evaluation in Wisconsin**

The Milwaukee MSA AA received a full-scope review. HNB did not originate a sufficient number of farm loans to draw a meaningful conclusion.

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

### **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Milwaukee MSA AA was excellent.

### **Lending Activity**

Lending levels reflected excellent responsiveness to AA credit needs when considering HNB's lending market rankings as compared to its deposit market ranking.

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full Scope</b>							
Milwaukee MSA	503	318	5	4	830	87.6	88.8
<b>Limited Scope</b>							
Racine MSA	78	38	0	1	117	12.4	11.2
<b>Total</b>	<b>581</b>	<b>356</b>	<b>5</b>	<b>5</b>	<b>947</b>	<b>100.0</b>	<b>100.0</b>
BSRA				5	5		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*BSRA-Broader Statewide Regional Area.

<b>Dollar Volume of Loans (000s)*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
<b>Full Scope</b>							
Milwaukee MSA	149,117	55,123	404	7,212	211,856	94.1	88.8
<b>Limited Scope</b>							
Racine MSA	10,933	2,089	0	89	13,111	5.9	11.2
<b>Total</b>	<b>160,050</b>	<b>57,212</b>	<b>404</b>	<b>7,301</b>	<b>224,967</b>	<b>100.0</b>	<b>100.0</b>
BSRA				11,749	11,749		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

\*\*BSRA-Broader Statewide Regional Area.

According to FDIC deposit data as of June 30, 2022, the bank had a deposit market share of 0.9 percent. The bank ranked 16<sup>th</sup> among 41 depository financial institutions placing it in the top 40 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 78<sup>th</sup> among 604 home mortgage lenders in the AA, which placed it in the top 13 percent of lenders. The top three lenders with a combined market share of 19.4 percent were Landmark Credit Union with 10.4 percent, UW Credit Union with 4.8 percent, and Summit Credit Union with 4.2 percent.

According to peer small business data for 2021, the bank had a market share of 0.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked 32<sup>nd</sup> among 158 small business lenders in the AA, which placed it in the top 21 percent of lenders. The top three lenders with a combined market share of 43.8 percent were US Bank, National Association with 18.1 percent, JPMorgan Chase Bank, National Association with 14.4 percent, and American Express National Bank with 11.3 percent.

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

The bank exhibited a good geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the Wisconsin 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

#### *2020-2021*

The bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

#### *2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to a better distribution of lending in low-income geographies.

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

Refer to Table Q in the Wisconsin 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

#### *2020-2021*

The bank's percentage of small business loans in low-income geographies was significantly below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small business loans in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

#### *2022*

The bank's performance in 2022 was stronger than the performance in 2020-2021 due to the better distribution of lending in low-income geographies.

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

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any conspicuous or unexplained gaps in lending.

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

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good when considering affordability concerns for low-income borrowers.

#### ***2020-2021***

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

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

Refer to Table R in the Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

#### ***2020-2021***

The bank did not collect or consider the gross annual revenues in the underwriting of 4.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but approximated the aggregate distribution of small loans to businesses.

#### ***2022***

The bank's performance in 2022 was consistent with the performance in 2020-2021.

### **Community Development Lending**

The institution is a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made four CD loans totaling \$7.2 million, which represented 9.5 percent of the allocated tier 1 capital. CD loans primarily supported economic development. By dollar volume, 99 percent funded economic development, and one percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- The bank originated a \$1.2 million dollar loan to purchase a dental practice. Financing the purchase of the dental practice allows for the retention of 14 jobs in a moderate-income census tract.
- The bank originated a \$2.6 million dollar SBA 7(a) term loan to a female small business owner for the purchase of a manufacturing/packing company. The transaction will result in the creation of four jobs in a moderate-income tract.

### *Broader Statewide and Regional Lending*

Because HNB was responsive to credit needs in its assessment area, the OCC also considered CD loans in the BSRA that did not have a purpose, mandate, or function to serve the bank's AAs. HNB originated an additional five CD loans totaling \$11.7 million in the BSRA outside the bank's AAs, which did not have a purpose, mandate, or function to serve bank's AA. CD lending in the BSRA further supported the excellent Lending Test rating in Wisconsin.

### **Product Innovation and Flexibility**

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated 44 loans under its flexible lending programs totaling \$3.9 million. Refer to the comment in the Flexible Lending Programs and other Lending information section of this PE for details regarding these programs.

<b>Flexible Lending Product</b>	<b># of Loans</b>	<b>Dollar Amount (000s)</b>
Conventional Flexible - All Products	17	\$2,753
Debt Manager	13	\$216
Port - 30 Year Fixed - CAM CRA	4	\$489
Unsecured HI	9	\$253
WI HEDA - 30 Year Fixed – 1st THB Adv HFA P Conv	1	\$155
<b>Total</b>	44	\$3,865

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

Based on a limited-scope review, the bank's performance under the Lending Test in the Racine MSA was weaker than with the bank's overall performance under the Lending Test in the full-scope area. The weaker performance within the limited scope AA is due to the lack of CD lending. Weaker performance in the Racine MSA had minimal impact on the overall state Lending Test rating performance in Wisconsin.

## INVESTMENT TEST

The institution's performance under the Investment Test in Wisconsin is rated Outstanding.

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

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

#### Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments, donations, and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Scope</b>										
Milwaukee MSA	6	3,429	16	4,067	22	48.9	7,496	7.0	4	63
<b>Limited Scope</b>										
Racine MSA	0	0	3	13	3	28.9	13	0	0	0
BSRA	14	7,238	6	91,882	20	44.4	99,120	93	8	452
<b>Total</b>	<b>20</b>	<b>10,667</b>	<b>25</b>	<b>95,961</b>	<b>45</b>	<b>100</b>	<b>106,628</b>	<b>100</b>	<b>12</b>	<b>516</b>

\* 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.

The bank made 22 investments totaling \$7.5 million during the evaluation period, which included 14 qualifying grants and donations totaling \$78,000 to 12 organizations. The dollar volume of current and prior period investments represented 9.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99 percent of investments supported affordable housing, and 1 percent funded community services to LMI individuals. The institution rarely uses complex investments to support CD initiatives. The bank made two current period LIHTC fund investments totaling \$4 million.

Examples of CD investments in the AA include:

- The bank invested \$3.3 million in a LIHTC-eligible development fund. The investment will fund the construction of 57 affordable housing units eligible for section 8 Project-Based Rental Assistance.
- The bank invested \$704,000 in a LIHTC-eligible development fund. The investment will support construction of an affordable housing property that consists of 197 apartments.

### Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Racine MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker

performance was due to a poor level of qualified investments. Weaker performance in the limited-scope AA did not negatively impact the overall Investment Test rating in the state of Wisconsin.

### *Broader Statewide and Regional Investments*

HNB made six current period investments totaling \$91.8 million that benefited the broader statewide regional area whose purpose, mandate, or function included serving HNB's AA. These investments funded several LITHCs and various public capital investments in school districts within the state of Wisconsin. Fourteen prior period investments totaling \$7.2 million related to prior LIHTCs that benefited the broader statewide and regional area remained outstanding at the end of the evaluation period. These investments were consistent with the overall Outstanding Investment Test rating for the state of Wisconsin.

## **SERVICE TEST**

The bank's performance under the Service Test in Wisconsin is rated Outstanding.

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

Based on a full-scope review, the bank's performance in the Milwaukee MSA was excellent.

### **Retail Banking Services**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

<b>Distribution of Branch Delivery System</b>													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full Scope</b>													
Milwaukee MSA	88.8	11	84.6	9.1	36.4	27.3	27.3	0	15	18.2	32	33.6	0
<b>Limited Scope</b>													
Racine MSA	11.2	2	15.4	0	100	0	0	9.1	17.9	36.9	35.7	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.*

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

*Totals may not equal 100 percent due to rounding.*

HNB's distribution of branches in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. The OCC gave positive consideration for four branches in MUI geographies that provide additional accessibility for customers who live in LMI geographies. Of these branches, two were located within 1,000 feet of an LMI geography, and the remaining two serve residents of LMI geographies based on data provided by bank management and consistent with the methodology described in the Scope of the Evaluation section of this report. This had a positive impact on the service delivery system conclusion.

HNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. HNB had 14 ATMs in the AA, all of which were deposit-taking. HNB provided data that indicated 71.9 percent of customers in LMI geographies used the bank's mobile application or accessed OLB during the fourth quarter of 2022. Because HNB acquired these branches and customers during the evaluation period, data from the first quarter of 2020 is unavailable.

<b>Distribution of Branch Openings/Closings</b>							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full Scope</b>							
Milwaukee MSA	0	0	0	0	0	0	0
<b>Limited Scope</b>							
Racine MSA	0	0	0	0	0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.  
The NA category consists of geographies that have not been assigned an income classification.*

The bank did not open or close any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AAs, particularly LMI geographies and/or individuals.

The bank operated 11 branches in the Milwaukee MSA. Of these, 10 were traditional branches, and one was a limited-purpose commercial branch. The traditional branches operated from 9:00 a.m. to 5:00 p.m., Monday through Friday, with eight branches, including all branches in LMI geographies, operating on Saturdays from 9:00 a.m. to 12:00 p.m. Drive-thru facilities operated at all the traditional branches and maintained the same hours as the branches. The limited-purpose commercial branch operated by appointment only during the evaluation period.

## Community Development Services

The institution provides a relatively high level of CD services.

HNB employees provided 70 qualified CD service activities to 10 organizations with 312 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in 11 of these activities with bank employees providing 150 service hours. The bank's CD services were primarily focused on community services targeted to LMI individuals, which represented 52 service activities and 227 service hours.

Service activity examples during the evaluation period include:

- HNB employees served on the board of directors and three other committees, for a CDFI that provides economic development assistance in business planning, market analysis, marketing strategies, and effective day-to-day business operations to the Hmong and Asian American communities in Wisconsin regarding business and economic issues. The HNB employees provided a total of 43 hours of service across the evaluation period. This CDFI works with LMI immigrant populations throughout Wisconsin.



- HNB employees served on the board of directors for a non-profit organization that provides education and training programs designed to increase the diversity and distribution of the healthcare workforce and enhance healthcare quality and delivery in rural and medically underserved communities. The HNB employees provided a total of 42 hours of service across the evaluation period.
- Eight HNB employees provided nine hours of virtual small business development training while volunteering at an event sponsored by a CDFI that provides business loans and access to fair and responsible capital, quality business and financial wellness training, and one-on-one coaching for small business entrepreneurs and start-ups. The HNB employees discussed access to capital, how to be application ready, interview preparation, and preparing business plans. A majority of the small businesses who attended the event have gross annual revenues of \$1 million or less.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Racine MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2020 through December 31, 2022	
<b>Bank Products Reviewed:</b>	Home mortgage loans, small business loans, small farm loans, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
The Huntington Foundation	Corporate Foundation	Donations
The Huntington Akron Foundation	Corporate Foundation	Donations
Huntington Equity Investments, LLC	Affiliate	Community Development Investments and Loans
Huntington Community Development Corporation	Subsidiary	Community Development Investments and Loans
Huntington Public Capital Corporation	Subsidiary	Community Development Investments and Loans
<b>List of AAs and Type of Examination</b>		
Ratings and AAs	Type of Review	Other Information (Metropolitan Divisions and/or Counties)
<b>MMSAs</b>		
Chicago-Naperville-Elgin, IL-IN-WI (Chicago MMSA) *	Full	<u>Chicago-Naperville-Evanston, IL MD</u> IL: Cook, DuPage, McHenry, Will  <u>Elgin, IL MD</u> IL: DeKalb, Kane, Kendall  <u>Lake County-Kenosha County, IL-WI MD</u> IL: Lake WI: Kenosha
Cincinnati, OH-KY-IN (Cincinnati MSA)	Full	KY: Boone, Kenton OH: Butler, Clermont, Hamilton, Warren
Weirton-Steubenville, WV-OH (Weirton MMSA)	Full	OH: Jefferson WV: Hancock
Youngstown-Warren-Boardman, OH-PA (Youngstown MMSA)	Full	OH: Mahoning, Trumbull PA: Mercer
<b>States</b>		
<b>Colorado</b>		
Boulder, CO MSA (Boulder MSA)	Limited	Boulder
Colorado Springs, CO MSA (Colorado Springs MSA)	Limited	El Paso
Denver-Aurora-Lakewood, CO MSA (Denver MSA)	Full	Adams, Arapahoe, Broomfield, Denver, Douglas, Jefferson
<b>Florida</b>		
Naples-Marco Island, FL MSA (Naples MSA)	Full	Collier
<b>Indiana</b>		

Indianapolis-Carmel-Anderson, IN MSA (Indianapolis MSA)	Full	Boone, Hamilton, Hendricks, Johnson, Madison, Marion
Lafayette-West Lafayette, IN MSA (Lafayette MSA)	Limited	Tippecanoe
<b>Michigan</b>		
Ann Arbor, MI MSA (Ann Arbor MSA)	Limited	Washtenaw
Battle Creek, MI MSA (Battle Creek MSA)	Limited	Calhoun
Bay City, MI MSA (Bay City MSA)	Limited	Bay
Detroit-Warren-Dearborn, MI MSA (Detroit MSA)	Full	<u>Detroit-Dearborn-Livonia, MI MD</u> Wayne  <u>Warren-Troy-Farmington Hills, MI MD</u> Lapeer, Livingston, Macomb, Oakland, St. Clair County
Flint, MI MSA (Flint MSA)	Full	Genesee
Grand Rapids-Kentwood, MI MSA (Grand Rapids MSA)	Limited	Ionia, Kent, Montcalm, Ottawa
Jackson, MI MSA (Jackson MSA)	Limited	Jackson
Kalamazoo-Portage, MI MSA (Kalamazoo MSA)	Limited	Kalamazoo
Lansing-East Lansing, MI MSA (Lansing MSA)	Limited	Clinton, Eaton, Ingham, Shiawassee
Midland, MI MSA (Midland MSA)	Limited	Midland
Monroe, MI MSA (Monroe MSA)	Limited	Monroe
Muskegon, MI MSA (Muskegon MSA)	Limited	Muskegon
Niles, MI MSA (Niles MSA)	Limited	Berrien
Saginaw, MI MSA (Saginaw MSA)	Full	Saginaw
South Bend-Mishawaka, IN-MI MSA (South Bend MSA)	Limited	Cass
Michigan non-metro** (MI Non-MSA)	Limited	Allegan, Alpena, Antrim, Arenac, Barry, Branch, Charlevoix, Chippewa, Clare, Crawford, Delta, Dickinson, Emmet, Gladwin, Grand Traverse, Gratiot, Hillsdale, Houghton, Huron, Iosco, Isabella, Kalkaska, Leelanau, Lenawee, Manistee, Marquette, Mason, Mecosta, Missaukee, Montmorency, Newaygo, Oceana, Ogemaw, Osceola, Oscoda, Otsego, Presque Isle, Roscommon, Sanilac, St. Joseph, Tuscola, Van Buren, Wexford
<b>Minnesota</b>		
Duluth, MN-WI MSA (Duluth MSA)	Limited	St. Louis
Mankato, MN MSA (Mankato MSA)	Limited	Blue Earth
Minneapolis-St. Paul-Bloomington, MN-WI MSA (Minneapolis MSA)	Full	Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington, Wright

St. Cloud, MN MSA (St. Cloud MSA)	Limited	Benton, Stearns
Minnesota non-metro (MN Non-MSA)	Limited	Rice
<b>Ohio</b>		
Akron, OH MSA (Akron MSA)	Limited	Portage, Summit
Canton, OH MSA (Canton MSA)	Limited	Carroll, Stark
Cleveland-Elyria, OH MSA (Cleveland MSA)	Full	Cuyahoga, Geauga, Lake, Lorain, Medina
Columbus, OH MSA (Columbus MSA)	Full	Delaware, Fairfield, Franklin, Licking, Madison, Pickaway, Union
Dayton-Kettering, OH, MSA (Dayton MSA)	Limited	Greene, Miami, Montgomery
Lima, OH MSA (Lima MSA)	Limited	Allen
Mansfield, OH MSA (Mansfield MSA)	Limited	Richland
Springfield, OH MSA (Springfield MSA)	Limited	Clark
Toledo, OH MSA (Toledo MSA)	Full	Fulton, Lucas, Ottawa, Wood
Wheeling, WV-OH MSA (Wheeling MSA)	Limited	Belmont
Ohio non-metro (OH Non-MSA)	Limited	Ashland, Ashtabula, Columbiana, Crawford, Defiance, Erie, Fayette, Guernsey, Hancock, Hardin, Harrison, Henry, Huron, Knox, Logan, Marion, Muskingum, Putnam, Ross, Sandusky, Seneca, Tuscarawas, Washington, Wayne, Williams, Wyandot
<b>Pennsylvania</b>		
Erie, PA MSA (Erie MSA)	Limited	Erie
Pittsburgh, PA MSA (Pittsburgh MSA)	Full	Allegheny, Beaver, Butler, Washington, Westmoreland
Pennsylvania non-metro (PA Non-MSA)	Limited	Lawrence
<b>South Dakota</b>		
Sioux Falls, SD MSA (Sioux Falls MSA)	Full	Minnehaha
<b>West Virginia</b>		
Charleston, WV MSA (Charleston MSA)	Limited	Kanawha
Huntington-Ashland, WV-KY-OH MSA (Huntington MSA)	Limited	Cabell, Putnam, Wayne
Morgantown, WV MSA (Morgantown MSA)	Limited	Monongalia
Parkersburg-Vienna, WV MSA (Parkersburg MSA)	Limited	Wood
West Virginia non-metro (WV Non-MSA)	Full	Harrison, Lewis, Marion, Randolph, Ritchie
<b>Wisconsin</b>		
Milwaukee-Waukesha, WI MSA (Milwaukee MSA)	Full	Milwaukee, Waukesha
Racine, WI MSA (Racine MSA)	Limited	Racine

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\* Huntington entered DeKalb County, IL, Kendall County, IL, and Kenosha County, WI on June 9, 2021. The evaluation for the Chicago, IL MMSA covers the period of January 1, 2020 through December 31, 2022. The OCC will utilize performance context as needed to explain the entry into these counties as part of the TCF merger.

\*\* Huntington entered 14 Michigan non-metropolitan counties as part of the TCF acquisition. Newly entered counties will be evaluated over the period of June 9, 2021 through December 31, 2022.

## Appendix B: Summary of MMSA and State Ratings

RATINGS      The Huntington National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The Huntington National Bank	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Chicago MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Cincinnati MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Weirton MMSA	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Youngstown MMSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Colorado	High Satisfactory	Outstanding	Outstanding	Outstanding
Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	Outstanding	Outstanding	Outstanding	Outstanding
Minnesota	Outstanding	High Satisfactory	Outstanding	Outstanding
Ohio	Outstanding	Outstanding	Outstanding	Outstanding
Pennsylvania	Outstanding	Outstanding	High Satisfactory	Outstanding
South Dakota	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
West Virginia	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Wisconsin	Outstanding	Outstanding	Outstanding	Outstanding

\*The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## 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:** 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.

**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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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 (Low):** An individual income that is 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/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.

**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.

**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 rating 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 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 loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

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

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

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. 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.

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

## Chicago MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Chicago MMSA	19,691	7,372,892	100.0	476,604	4.5	2.8	3.2	18.0	12.3	13.8	35.7	23.4	33.9	41.7	61.3	48.9	0.1	0.2	0.1	
Total	19,691	7,372,892	100.0	476,604	4.5	2.8	3.2	18.0	12.3	13.8	35.7	23.4	33.9	41.7	61.3	48.9	0.1	0.2	0.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Chicago MMSA	7,637	2,392,561	100.0	228,293	4.5	4.1	4.4	18.6	17.3	17.1	37.2	30.1	36.6	39.4	48.2	41.7	0.3	0.3	0.3	
Total	7,637	2,392,561	100.0	228,293	4.5	4.1	4.4	18.6	17.3	17.1	37.2	30.1	36.6	39.4	48.2	41.7	0.3	0.3	0.3	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MMSA	19,691	7,372,891	100.0	476,604	23.5	4.2	6.5	16.4	13.0	16.3	18.7	18.3	21.0	41.5	64.0	40.1	0.0	0.5	16.1
<b>Total</b>	<b>19,691</b>	<b>7,372,891</b>	<b>100.0</b>	<b>476,604</b>	<b>23.5</b>	<b>4.2</b>	<b>6.5</b>	<b>16.4</b>	<b>13.0</b>	<b>16.3</b>	<b>18.7</b>	<b>18.3</b>	<b>21.0</b>	<b>41.5</b>	<b>64.0</b>	<b>40.1</b>	<b>0.0</b>	<b>0.5</b>	<b>16.1</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MMSA	7,637	2,392,561	100.0	228,293	23.0	12.1	10.3	16.7	21.3	21.3	19.3	19.9	20.8	40.9	46.5	31.1	0.0	0.1	16.6
<b>Total</b>	<b>7,637</b>	<b>2,392,561</b>	<b>100.0</b>	<b>228,293</b>	<b>23.0</b>	<b>12.1</b>	<b>10.3</b>	<b>16.7</b>	<b>21.3</b>	<b>21.3</b>	<b>19.3</b>	<b>19.9</b>	<b>20.8</b>	<b>40.9</b>	<b>46.5</b>	<b>31.1</b>	<b>0.0</b>	<b>0.1</b>	<b>16.6</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Chicago MMSA	3,934	502,939	100.0	301,912	6.1	2.8	7.0	16.9	14.7	19.0	28.9	35.5	30.7	47.5	46.7	43.1	0.5	0.3	0.3
Total	3,934	502,939	100.0	301,912	6.1	2.8	7.0	16.9	14.7	19.0	28.9	35.5	30.7	47.5	46.7	43.1	0.5	0.3	0.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago MMSA	1,818	207,335	100.0	5.9	4.2	17.2	16.2	31.6	41.3	44.8	38.3	0.6	0.1
Total	1,818	207,335	100.0	5.9	4.2	17.2	16.2	31.6	41.3	44.8	38.3	0.6	0.1
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
Chicago MMSA	3,934	502,939	100.0	301,912	86.7	62.5	43.6	5.0	29.8	8.3	7.7
<b>Total</b>	<b>3,934</b>	<b>502,939</b>	<b>100.0</b>	<b>301,912</b>	<b>86.7</b>	<b>62.5</b>	<b>43.6</b>	<b>5.0</b>	<b>29.8</b>	<b>8.3</b>	<b>7.7</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Chicago MMSA	1,818	207,335	100.0	--	89.5	70.1	--	3.9	29.5	6.6	0.3
<b>Total</b>	<b>1,818</b>	<b>207,335</b>	<b>100.0</b>	<b>--</b>	<b>89.5</b>	<b>70.1</b>	<b>--</b>	<b>3.9</b>	<b>29.5</b>	<b>6.6</b>	<b>0.3</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Chicago MMSA	41	4,537	100.0	1,329	3.7	2.4	1.3	15.8	24.4	5.6	40.7	24.4	70.8	39.6	48.8	22.3	0.1	0.0	0.1
Total	41	4,537	100.0	1,329	3.7	2.4	1.3	15.8	24.4	5.6	40.7	24.4	70.8	39.6	48.8	22.3	0.1	0.0	0.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MMSA	13	690	100.0	4.3	0.0	18.5	7.7	39.4	53.8	37.6	38.5	0.3	0.0
Total	13	690	100.0	4.3	0.0	18.5	7.7	39.4	53.8	37.6	38.5	0.3	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													



Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MMSA	41	4,537	100.0	1,329	94.6	73.2	61.6	3.2	22.0	2.2	4.9
<b>Total</b>	<b>41</b>	<b>4,537</b>	<b>100.0</b>	<b>1,329</b>	<b>94.6</b>	<b>73.2</b>	<b>61.6</b>	<b>3.2</b>	<b>22.0</b>	<b>2.2</b>	<b>4.9</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MMSA	13	690	100.0	--	95.5	84.6	--	2.6	15.4	1.9	0.0
<b>Total</b>	<b>13</b>	<b>690</b>	<b>100.0</b>	<b>--</b>	<b>95.5</b>	<b>84.6</b>	<b>--</b>	<b>2.6</b>	<b>15.4</b>	<b>1.9</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Cincinnati MMSA**

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cincinnati MMSA	10,653	2,401,927	100.0	119,005	4.3	3.1	3.5	14.9	10.8	12.9	40.8	35.9	39.3	40.0	50.1	44.2	0.1	0.1	0.1
Total	10,653	2,401,927	100.0	119,005	4.3	3.1	3.5	14.9	10.8	12.9	40.8	35.9	39.3	40.0	50.1	44.2	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cincinnati MMSA	3,519	856,429	100.0	70,777	3.5	2.0	3.3	17.9	17.2	18.9	39.4	34.6	38.3	38.6	45.8	38.9	0.6	0.3	0.6
Total	3,519	856,429	100.0	70,777	3.5	2.0	3.3	17.9	17.2	18.9	39.4	34.6	38.3	38.6	45.8	38.9	0.6	0.3	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020-21																			
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cincinnati MMSA	10,653	2,401,927	100.0	119,005	21.9	7.5	7.6	16.3	19.3	18.7	19.8	22.7	20.9	42.0	50.0	37.2	0.0	0.5	15.6
<b>Total</b>	<b>10,653</b>	<b>2,401,927</b>	<b>100.0</b>	<b>119,005</b>	<b>21.9</b>	<b>7.5</b>	<b>7.6</b>	<b>16.3</b>	<b>19.3</b>	<b>18.7</b>	<b>19.8</b>	<b>22.7</b>	<b>20.9</b>	<b>42.0</b>	<b>50.0</b>	<b>37.2</b>	<b>0.0</b>	<b>0.5</b>	<b>15.6</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022																			
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cincinnati MMSA	3,519	856,429	100.0	70,777	20.9	11.2	11.6	17.3	23.1	21.6	20.9	22.8	21.2	40.9	42.6	30.7	0.0	0.3	14.9
<b>Total</b>	<b>3,519</b>	<b>856,429</b>	<b>100.0</b>	<b>70,777</b>	<b>20.9</b>	<b>11.2</b>	<b>11.6</b>	<b>17.3</b>	<b>23.1</b>	<b>21.6</b>	<b>20.9</b>	<b>22.8</b>	<b>21.2</b>	<b>40.9</b>	<b>42.6</b>	<b>30.7</b>	<b>0.0</b>	<b>0.3</b>	<b>14.9</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Cincinnati MMSA	5,126	510,790	100.0	43,104	7.2	7.0	7.6	18.2	18.4	17.6	34.0	31.8	33.2	39.5	42.3	40.9	1.1	0.5	0.7
Total	5,126	510,790	100.0	43,104	7.2	7.0	7.6	18.2	18.4	17.6	34.0	31.8	33.2	39.5	42.3	40.9	1.1	0.5	0.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cincinnati MMSA	1,283	130,337	100.0	5.7	5.8	19.8	17.9	32.8	31.9	40.4	42.9	1.3	1.5
Total	1,283	130,337	100.0	5.7	5.8	19.8	17.9	32.8	31.9	40.4	42.9	1.3	1.5
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
Cincinnati MMSA	5,126	510,790	100.0	43,104	82.7	62.9	49.1	5.6	27.1	11.7	10.0
<b>Total</b>	<b>5,126</b>	<b>510,790</b>	<b>100.0</b>	<b>43,104</b>	<b>82.7</b>	<b>62.9</b>	<b>49.1</b>	<b>5.6</b>	<b>27.1</b>	<b>11.7</b>	<b>10.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Cincinnati MMSA	1,283	130,337	100.0	--	89.5	66.2	--	3.3	33.7	7.3	0.2
<b>Total</b>	<b>1,283</b>	<b>130,337</b>	<b>100.0</b>	<b>--</b>	<b>89.5</b>	<b>66.2</b>	<b>--</b>	<b>3.3</b>	<b>33.7</b>	<b>7.3</b>	<b>0.2</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Cincinnati MMSA	91	6,011	100.0	282	3.9	8.8	3.2	13.3	12.1	8.9	46.4	34.1	56.0	36.2	45.1	31.2	0.2	0.0	0.7
Total	91	6,011	100.0	282	3.9	8.8	3.2	13.3	12.1	8.9	46.4	34.1	56.0	36.2	45.1	31.2	0.2	0.0	0.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MMSA	20	1,905	100.0	3.2	0.0	15.9	10.0	41.6	35.0	38.4	55.0	0.8	0.0
Total	20	1,905	100.0	3.2	0.0	15.9	10.0	41.6	35.0	38.4	55.0	0.8	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MMSA	91	6,011	100.0	282	96.2	80.2	64.5	1.8	12.1	2.0	7.7
<b>Total</b>	<b>91</b>	<b>6,011</b>	<b>100.0</b>	<b>282</b>	<b>96.2</b>	<b>80.2</b>	<b>64.5</b>	<b>1.8</b>	<b>12.1</b>	<b>2.0</b>	<b>7.7</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cincinnati MMSA	20	1,905	100.0	--	97.3	95.0	--	1.2	5.0	1.5	0.0
<b>Total</b>	<b>20</b>	<b>1,905</b>	<b>100.0</b>	<b>--</b>	<b>97.3</b>	<b>95.0</b>	<b>--</b>	<b>1.2</b>	<b>5.0</b>	<b>1.5</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Weirton MMSA**

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Weirton MMSA	622	64,284	100.0	2,700	1.7	1.3	0.7	8.4	5.8	7.8	77.9	79.6	76.6	12.0	13.3	14.9	0.0	0.0	0.0
Total	622	64,284	100.0	2,700	1.7	1.3	0.7	8.4	5.8	7.8	77.9	79.6	76.6	12.0	13.3	14.9	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Weirton MMSA	232	24,465	100.0	2,171	0.4	0.0	0.3	7.2	4.3	5.1	78.1	80.6	77.5	14.3	15.1	17.1	0.0	0.0	0.0
Total	232	24,465	100.0	2,171	0.4	0.0	0.3	7.2	4.3	5.1	78.1	80.6	77.5	14.3	15.1	17.1	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2020-21</b>
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Weirton MMSA	622	64,284	100.0	2,700	19.4	7.4	5.5	19.4	18.5	18.2	21.4	28.5	22.6	39.8	45.5	36.1	0.0	0.2	17.6
<b>Total</b>	<b>622</b>	<b>64,284</b>	<b>100.0</b>	<b>2,700</b>	<b>19.4</b>	<b>7.4</b>	<b>5.5</b>	<b>19.4</b>	<b>18.5</b>	<b>18.2</b>	<b>21.4</b>	<b>28.5</b>	<b>22.6</b>	<b>39.8</b>	<b>45.5</b>	<b>36.1</b>	<b>0.0</b>	<b>0.2</b>	<b>17.6</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022</b>
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Weirton MMSA	232	24,465	100.0	2,171	20.4	9.9	8.8	17.9	30.6	23.3	22.3	28.9	24.0	39.4	30.6	28.7	0.0	0.0	15.2
<b>Total</b>	<b>232</b>	<b>24,465</b>	<b>100.0</b>	<b>2,171</b>	<b>20.4</b>	<b>9.9</b>	<b>8.8</b>	<b>17.9</b>	<b>30.6</b>	<b>23.3</b>	<b>22.3</b>	<b>28.9</b>	<b>24.0</b>	<b>39.4</b>	<b>30.6</b>	<b>28.7</b>	<b>0.0</b>	<b>0.0</b>	<b>15.2</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020-21
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	
Weirton MMSA	301	23,715	100.0	1,251	1.6	1.7	1.3	14.4	12.3	14.4	70.9	69.8	72.7	13.1	16.3	11.6	0.0	0.0	0.0	
Total	301	23,715	100.0	1,251	1.6	1.7	1.3	14.4	12.3	14.4	70.9	69.8	72.7	13.1	16.3	11.6	0.0	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Weirton MMSA	63	5,752	100.0	7.0	4.8	7.7	4.8	68.2	69.8	17.2	20.6	0.0	0.0
Total	63	5,752	100.0	7.0	4.8	7.7	4.8	68.2	69.8	17.2	20.6	0.0	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</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
Weirton MMSA	301	23,715	100.0	1,251	80.5	71.4	54.8	4.8	22.6	14.7	6.0
<b>Total</b>	<b>301</b>	<b>23,715</b>	<b>100.0</b>	<b>1,251</b>	<b>80.5</b>	<b>71.4</b>	<b>54.8</b>	<b>4.8</b>	<b>22.6</b>	<b>14.7</b>	<b>6.0</b>
Source: 2021 D&B Data; 01/01/2020 - 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</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
Weirton MMSA	63	5,752	100.0	--	84.7	73.0	--	3.7	27.0	11.6	0.0
<b>Total</b>	<b>63</b>	<b>5,752</b>	<b>100.0</b>	<b>--</b>	<b>84.7</b>	<b>73.0</b>	<b>--</b>	<b>3.7</b>	<b>27.0</b>	<b>11.6</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Weirton MMSA	5	305	100.0	26	1.2	0.0	0.0	7.4	0.0	0.0	82.7	80.0	84.6	8.6	20.0	15.4	0.0	0.0	0.0
<b>Total</b>	<b>5</b>	<b>305</b>	<b>100.0</b>	<b>26</b>	<b>1.2</b>	<b>0.0</b>	<b>0.0</b>	<b>7.4</b>	<b>0.0</b>	<b>0.0</b>	<b>82.7</b>	<b>80.0</b>	<b>84.6</b>	<b>8.6</b>	<b>20.0</b>	<b>15.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Weirton MMSA	1	16	100.0	0.5	0.0	6.9	0.0	80.3	100.0	12.4	0.0	0.0	0.0
Total	1	16	100.0	0.5	0.0	6.9	0.0	80.3	100.0	12.4	0.0	0.0	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2020-21</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Weirton MMSA	5	305	100.0	26	98.1	80.0	50.0	0.6	20.0	1.2	0.0
<b>Total</b>	<b>5</b>	<b>305</b>	<b>100.0</b>	<b>26</b>	<b>98.1</b>	<b>80.0</b>	<b>50.0</b>	<b>0.6</b>	<b>20.0</b>	<b>1.2</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2022</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Weirton MMSA	1	16	100.0	--	98.6	100.0	--	0.5	0.0	0.9	0.0
<b>Total</b>	<b>1</b>	<b>16</b>	<b>100.0</b>	<b>--</b>	<b>98.6</b>	<b>100.0</b>	<b>--</b>	<b>0.5</b>	<b>0.0</b>	<b>0.9</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Youngstown MMSA**

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Youngstown MMSA	4,557	507,335	100.0	20,593	5.1	1.2	1.1	12.5	9.1	7.6	53.0	51.9	55.0	29.3	37.8	36.3	0.0	0.0	0.0	
Total	4,557	507,335	100.0	20,593	5.1	1.2	1.1	12.5	9.1	7.6	53.0	51.9	55.0	29.3	37.8	36.3	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Youngstown MMSA	1,996	219,627	100.0	15,590	3.5	1.4	1.4	16.0	12.6	13.1	51.6	50.2	53.4	28.6	35.5	31.9	0.4	0.4	0.3	
Total	1,996	219,627	100.0	15,590	3.5	1.4	1.4	16.0	12.6	13.1	51.6	50.2	53.4	28.6	35.5	31.9	0.4	0.4	0.3	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Youngstown MMSA	4,557	507,335	100.0	20,593	20.5	9.3	7.9	18.4	23.8	21.4	20.6	26.9	22.4	40.5	39.7	32.9	0.0	0.3	15.3
Total	4,557	507,335	100.0	20,593	20.5	9.3	7.9	18.4	23.8	21.4	20.6	26.9	22.4	40.5	39.7	32.9	0.0	0.3	15.3
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Youngstown MMSA	1,996	219,627	100.0	15,590	22.1	11.5	9.1	16.8	23.3	21.3	21.1	25.7	22.5	40.0	39.5	33.4	0.0	0.0	13.7
Total	1,996	219,627	100.0	15,590	22.1	11.5	9.1	16.8	23.3	21.3	21.1	25.7	22.5	40.0	39.5	33.4	0.0	0.0	13.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography <span style="float: right;">2020-21</span>																			
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
Youngstown MMSA	2,441	202,122	100.0	10,091	7.9	6.9	7.5	12.6	12.1	11.1	44.8	41.8	43.3	34.7	39.2	38.2	0.0	0.0	0.0
<b>Total</b>	<b>2,441</b>	<b>202,122</b>	<b>100.0</b>	<b>10,091</b>	<b>7.9</b>	<b>6.9</b>	<b>7.5</b>	<b>12.6</b>	<b>12.1</b>	<b>11.1</b>	<b>44.8</b>	<b>41.8</b>	<b>43.3</b>	<b>34.7</b>	<b>39.2</b>	<b>38.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Youngstown MMSA	598	45,426	100.0	6.2	4.5	16.4	14.9	42.4	49.5	34.6	29.4	0.4	1.7
Total	598	45,426	100.0	6.2	4.5	16.4	14.9	42.4	49.5	34.6	29.4	0.4	1.7
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Youngstown MMSA	2,441	202,122	100.0	10,091	81.6	68.3	49.4	5.7	21.8	12.7	9.8
<b>Total</b>	<b>2,441</b>	<b>202,122</b>	<b>100.0</b>	<b>10,091</b>	<b>81.6</b>	<b>68.3</b>	<b>49.4</b>	<b>5.7</b>	<b>21.8</b>	<b>12.7</b>	<b>9.8</b>
Source: 2021 D&B Data; 01/01/2020 - 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</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Youngstown MMSA	598	45,426	100.0	--	87.7	73.9	--	3.7	25.9	8.6	0.2
<b>Total</b>	<b>598</b>	<b>45,426</b>	<b>100.0</b>	<b>--</b>	<b>87.7</b>	<b>73.9</b>	<b>--</b>	<b>3.7</b>	<b>25.9</b>	<b>8.6</b>	<b>0.2</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Youngstown MMSA	42	2,805	100.0	178	2.2	4.8	1.7	6.6	4.8	0.0	58.3	47.6	64.0	32.9	42.9	34.3	0.0	0.0	0.0
<b>Total</b>	<b>42</b>	<b>2,805</b>	<b>100.0</b>	<b>178</b>	<b>2.2</b>	<b>4.8</b>	<b>1.7</b>	<b>6.6</b>	<b>4.8</b>	<b>0.0</b>	<b>58.3</b>	<b>47.6</b>	<b>64.0</b>	<b>32.9</b>	<b>42.9</b>	<b>34.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	10	556	100.0	1.9	0.0	12.4	0.0	53.8	80.0	31.8	20.0	0.2	0.0
Total	10	556	100.0	1.9	0.0	12.4	0.0	53.8	80.0	31.8	20.0	0.2	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	42	2,805	100.0	178	97.8	83.3	54.5	1.3	14.3	0.9	2.4
<b>Total</b>	<b>42</b>	<b>2,805</b>	<b>100.0</b>	<b>178</b>	<b>97.8</b>	<b>83.3</b>	<b>54.5</b>	<b>1.3</b>	<b>14.3</b>	<b>0.9</b>	<b>2.4</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	10	556	100.0	--	98.3	80.0	--	0.9	20.0	0.8	0.0
<b>Total</b>	<b>10</b>	<b>556</b>	<b>100.0</b>	<b>--</b>	<b>98.3</b>	<b>80.0</b>	<b>--</b>	<b>0.9</b>	<b>20.0</b>	<b>0.8</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Colorado****Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Denver MSA	430	278,958	75.2	273,050	4.7	2.3	4.4	18.9	12.1	17.8	33.9	24.2	32.9	42.5	61.4	44.9	0.0	0.0	0.0
Boulder MSA	33	26,314	5.8	25,137	3.0	3.0	3.4	18.0	3.0	16.8	45.6	42.4	47.1	33.3	51.5	32.7	0.0	0.0	0.0
Colorado Springs MSA	109	44,675	19.1	71,262	3.3	1.8	2.3	20.7	11.0	17.3	42.2	34.9	43.6	33.8	52.3	36.8	0.0	0.0	0.0
<b>Total</b>	<b>572</b>	<b>349,948</b>	<b>100.0</b>	<b>369,449</b>	<b>4.3</b>	<b>2.3</b>	<b>3.9</b>	<b>19.1</b>	<b>11.4</b>	<b>17.7</b>	<b>36.4</b>	<b>27.3</b>	<b>35.9</b>	<b>40.2</b>	<b>59.1</b>	<b>42.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Denver MSA	892	387,727	73.3	129,977	2.9	2.1	2.7	21.2	16.7	20.5	36.8	33.5	35.7	38.6	47.2	40.5	0.5	0.4	0.5	
Boulder MSA	74	41,448	6.1	10,972	1.7	0.0	1.3	14.2	10.8	13.4	44.2	45.9	44.6	38.6	43.2	39.3	1.3	0.0	1.4	
Colorado Springs MSA	251	127,137	20.6	37,463	1.3	1.2	1.6	19.7	17.9	17.8	41.9	38.2	39.2	37.0	42.2	41.2	0.3	0.4	0.2	
Total	1,217	556,312	100.0	178,412	2.5	1.8	2.4	20.3	16.6	19.5	38.4	35.3	37.0	38.3	45.9	40.6	0.5	0.4	0.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Denver MSA	430	278,958	75.2	273,050	21.4	1.9	7.8	17.5	14.4	18.6	20.4	16.7	22.2	40.7	66.5	33.7	0.0	0.5	17.7	
Boulder MSA	33	26,314	5.8	25,137	22.3	3.0	8.6	17.0	6.1	16.8	19.9	9.1	20.9	40.8	81.8	40.7	0.0	0.0	13.0	
Colorado Springs MSA	109	44,675	19.1	71,262	20.4	0.9	4.1	18.5	13.8	14.5	20.3	29.4	20.7	40.8	56.0	32.8	0.0	0.0	27.8	
Total	572	349,948	100.0	369,449	21.3	1.7	7.1	17.6	13.8	17.7	20.3	18.7	21.8	40.8	65.4	34.0	0.0	0.4	19.3	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Denver MSA	892	387,727	73.3	129,977	20.2	5.5	7.5	18.2	16.4	18.4	21.9	21.7	23.1	39.7	56.2	36.7	0.0	0.2	14.3	
Boulder MSA	74	41,448	6.1	10,972	20.5	4.1	7.8	17.8	12.2	14.5	21.3	17.6	18.9	40.5	66.2	47.2	0.0	0.0	11.6	
Colorado Springs MSA	251	127,137	20.6	37,463	18.9	6.4	5.3	18.6	21.5	17.6	21.9	24.3	25.4	40.6	47.0	36.5	0.0	0.8	15.3	
Total	1,217	556,312	100.0	178,412	20.0	5.6	7.1	18.2	17.2	18.0	21.8	22.0	23.3	39.9	54.9	37.3	0.0	0.3	14.3	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Denver MSA	107	15,581	87.0	101,584	6.9	13.1	7.7	19.0	21.5	18.7	31.9	29.9	31.0	41.9	33.6	42.3	0.3	1.9	0.3
Boulder MSA	8	1,013	6.5	14,228	3.8	0.0	3.9	27.7	37.5	28.8	38.7	37.5	38.3	29.8	25.0	28.9	0.0	0.0	0.0
Colorado Springs MSA	8	1,532	6.5	17,565	6.9	12.5	7.4	23.2	25.0	22.6	34.1	12.5	32.5	35.7	50.0	37.4	0.1	0.0	0.0
Total	123	18,126	100.0	133,377	6.5	12.2	7.2	20.6	22.8	20.3	32.9	29.3	32.0	39.7	34.1	40.2	0.3	1.6	0.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Denver MSA	294	31,838	82.4	4.1	7.8	21.2	28.2	32.7	28.6	38.5	31.0	3.5	4.4
Boulder MSA	25	3,114	7.0	1.9	4.0	23.9	12.0	36.9	36.0	35.5	48.0	1.8	0.0
Colorado Springs MSA	38	4,402	10.6	1.4	0.0	25.7	34.2	36.2	36.8	36.2	28.9	0.7	0.0
<b>Total</b>	<b>357</b>	<b>39,354</b>	<b>100.0</b>	<b>3.5</b>	<b>6.7</b>	<b>22.1</b>	<b>27.7</b>	<b>33.7</b>	<b>30.0</b>	<b>37.9</b>	<b>31.9</b>	<b>2.9</b>	<b>3.6</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</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
Denver MSA	107	15,581	87.0	101,584	92.4	59.8	47.6	2.4	37.4	5.2	2.8
Boulder MSA	8	1,013	6.5	14,228	92.8	62.5	48.2	2.3	37.5	4.9	0.0
Colorado Springs MSA	8	1,532	6.5	17,565	92.6	75.0	54.4	1.9	25.0	5.5	0.0
<b>Total</b>	<b>123</b>	<b>18,126</b>	<b>100.0</b>	<b>133,377</b>	<b>92.5</b>	<b>61.0</b>	<b>48.6</b>	<b>2.3</b>	<b>36.6</b>	<b>5.2</b>	<b>2.4</b>
Source: 2021 D&B Data; 01/01/2020 - 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</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
Denver MSA	294	31,838	82.4	--	93.7	74.5	--	1.9	24.8	4.5	0.7
Boulder MSA	25	3,114	7.0	--	94.3	60.0	--	1.7	40.0	4.0	0.0
Colorado Springs MSA	38	4,402	10.6	--	94.0	73.7	--	1.5	26.3	4.6	0.0
<b>Total</b>	<b>357</b>	<b>39,354</b>	<b>100.0</b>	<b>--</b>	<b>93.8</b>	<b>73.4</b>	<b>--</b>	<b>1.8</b>	<b>26.1</b>	<b>4.4</b>	<b>0.6</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Denver MSA	4	594	100.0	407	7.9	0.0	3.4	19.6	0.0	6.9	31.1	75.0	36.9	41.0	25.0	52.1	0.3	0.0	0.7
Boulder MSA	0	0	0.0	87	4.6	0.0	0.0	24.5	0.0	10.3	40.1	0.0	49.4	30.9	0.0	40.2	0.0	0.0	0.0
Colorado Springs MSA	0	0	0.0	97	6.9	0.0	3.1	20.9	0.0	7.2	42.2	0.0	49.5	30.0	0.0	40.2	0.0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>594</b>	<b>100.0</b>	<b>591</b>	<b>7.3</b>	<b>0.0</b>	<b>2.9</b>	<b>20.5</b>	<b>0.0</b>	<b>7.4</b>	<b>34.3</b>	<b>75.0</b>	<b>40.8</b>	<b>37.7</b>	<b>25.0</b>	<b>48.4</b>	<b>0.2</b>	<b>0.0</b>	<b>0.5</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2022**

Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver MSA	3	321	100.0	4.5	0.0	22.9	0.0	35.0	0.0	35.8	33.3	1.8	66.7
Boulder MSA	0	0	0.0	1.7	0.0	22.7	0.0	40.7	0.0	33.8	0.0	1.0	0.0
Colorado Springs MSA	0	0	0.0	0.8	0.0	24.7	0.0	42.2	0.0	31.6	0.0	0.7	0.0
<b>Total</b>	<b>3</b>	<b>321</b>	<b>100.0</b>	<b>3.5</b>	<b>0.0</b>	<b>23.2</b>	<b>0.0</b>	<b>37.0</b>	<b>0.0</b>	<b>34.8</b>	<b>33.3</b>	<b>1.5</b>	<b>66.7</b>

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver MSA	4	594	100.0	407	96.6	25.0	63.6	1.7	75.0	1.7	0.0
Boulder MSA	--	--	--	87	97.4	--	82.8	1.2	--	1.3	--
Colorado Springs MSA	--	--	--	97	97.4	--	60.8	1.2	--	1.4	--
<b>Total</b>	<b>4</b>	<b>594</b>	<b>100.0</b>	<b>591</b>	<b>96.8</b>	<b>25.0</b>	<b>66.0</b>	<b>1.6</b>	<b>75.0</b>	<b>1.6</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver MSA	3	321	100.0	--	97.0	66.7	--	1.4	0.0	1.6	33.3
Boulder MSA	--	--	--	--	98.0	--	--	0.7	--	1.3	--
Colorado Springs MSA	--	--	--	--	97.9	--	--	0.9	--	1.2	--
<b>Total</b>	<b>3</b>	<b>321</b>	<b>100.0</b>	<b>--</b>	<b>97.3</b>	<b>66.7</b>	<b>--</b>	<b>1.2</b>	<b>0.0</b>	<b>1.5</b>	<b>33.3</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Florida****Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Naples MSA	219	143,845	100.0	27,642	2.3	1.8	1.2	16.3	10.5	14.3	41.3	29.2	42.4	40.1	58.4	42.1	0.0	0.0	0.0
<b>Total</b>	<b>219</b>	<b>143,845</b>	<b>100.0</b>	<b>27,642</b>	<b>2.3</b>	<b>1.8</b>	<b>1.2</b>	<b>16.3</b>	<b>10.5</b>	<b>14.3</b>	<b>41.3</b>	<b>29.2</b>	<b>42.4</b>	<b>40.1</b>	<b>58.4</b>	<b>42.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Naples MSA	92	65,710	100.0	16,116	2.3	3.3	1.1	17.4	18.5	18.5	40.7	37.0	44.7	38.4	41.3	34.5	1.2	0.0	1.2
<b>Total</b>	<b>92</b>	<b>65,710</b>	<b>100.0</b>	<b>16,116</b>	<b>2.3</b>	<b>3.3</b>	<b>1.1</b>	<b>17.4</b>	<b>18.5</b>	<b>18.5</b>	<b>40.7</b>	<b>37.0</b>	<b>44.7</b>	<b>38.4</b>	<b>41.3</b>	<b>34.5</b>	<b>1.2</b>	<b>0.0</b>	<b>1.2</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Naples MSA	219	143,845	100.0	27,642	20.8	1.8	3.2	17.7	1.4	12.4	19.3	3.7	17.6	42.2	92.7	53.7	0.0	0.5	13.0
Total	219	143,845	100.0	27,642	20.8	1.8	3.2	17.7	1.4	12.4	19.3	3.7	17.6	42.2	92.7	53.7	0.0	0.5	13.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Naples MSA	92	65,710	100.0	16,116	21.9	2.2	4.2	18.0	10.9	12.0	19.6	10.9	18.5	40.5	75.0	52.4	0.0	1.1	12.9
Total	92	65,710	100.0	16,116	21.9	2.2	4.2	18.0	10.9	12.0	19.6	10.9	18.5	40.5	75.0	52.4	0.0	1.1	12.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

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
Naples MSA	73	9,645	100.0	17,665	2.8	4.1	3.0	14.3	13.7	12.7	37.9	35.6	39.8	45.1	46.6	44.4	0.0	0.0	0.0
<b>Total</b>	<b>73</b>	<b>9,645</b>	<b>100.0</b>	<b>17,665</b>	<b>2.8</b>	<b>4.1</b>	<b>3.0</b>	<b>14.3</b>	<b>13.7</b>	<b>12.7</b>	<b>37.9</b>	<b>35.6</b>	<b>39.8</b>	<b>45.1</b>	<b>46.6</b>	<b>44.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022**

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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Naples MSA	42	6,129	100.0	2.6	0.0	15.3	11.9	41.9	59.5	39.2	28.6	1.1	0.0
<b>Total</b>	<b>42</b>	<b>6,129</b>	<b>100.0</b>	<b>2.6</b>	<b>0.0</b>	<b>15.3</b>	<b>11.9</b>	<b>41.9</b>	<b>59.5</b>	<b>39.2</b>	<b>28.6</b>	<b>1.1</b>	<b>0.0</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Naples MSA	73	9,645	100.0	17,665	93.5	64.4	46.8	2.0	28.8	4.4	6.8
<b>Total</b>	<b>73</b>	<b>9,645</b>	<b>100.0</b>	<b>17,665</b>	<b>93.5</b>	<b>64.4</b>	<b>46.8</b>	<b>2.0</b>	<b>28.8</b>	<b>4.4</b>	<b>6.8</b>
Source: 2021 D&B Data; 01/01/2020 - 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</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Naples MSA	42	6,129	100.0	--	94.3	57.1	--	1.7	40.5	4.0	2.4
<b>Total</b>	<b>42</b>	<b>6,129</b>	<b>100.0</b>	<b>--</b>	<b>94.3</b>	<b>57.1</b>	<b>--</b>	<b>1.7</b>	<b>40.5</b>	<b>4.0</b>	<b>2.4</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											



Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Naples MSA	0	0	0.0	60	5.6	0.0	8.3	21.3	0.0	26.7	42.9	0.0	38.3	30.2	0.0	26.7	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.0</b>	<b>60</b>	<b>5.6</b>	<b>0.0</b>	<b>8.3</b>	<b>21.3</b>	<b>0.0</b>	<b>26.7</b>	<b>42.9</b>	<b>0.0</b>	<b>38.3</b>	<b>30.2</b>	<b>0.0</b>	<b>26.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Naples MSA	2	345	100.0	7.7	0.0	26.3	0.0	41.6	0.0	23.8	100.0	0.7	0.0
Total	2	345	100.0	7.7	0.0	26.3	0.0	41.6	0.0	23.8	100.0	0.7	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Naples MSA	0	0	0.0	60	96.2	0.0	68.3	2.6	0.0	1.2	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.0</b>	<b>60</b>	<b>96.2</b>	<b>0.0</b>	<b>68.3</b>	<b>2.6</b>	<b>0.0</b>	<b>1.2</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Naples MSA	2	345	100.0	--	96.6	100.0	--	2.4	0.0	1.1	0.0
<b>Total</b>	<b>2</b>	<b>345</b>	<b>100.0</b>	<b>--</b>	<b>96.6</b>	<b>100.0</b>	<b>--</b>	<b>2.4</b>	<b>0.0</b>	<b>1.1</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Indiana****Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indianapolis MSA	10,360	2,302,577	95.0	121,627	6.9	4.8	5.0	18.4	14.1	14.8	34.3	25.0	31.7	40.3	56.1	48.4	0.1	0.0	0.1
Lafayette MSA	543	78,722	5.0	8,969	1.1	1.5	1.0	16.2	16.8	14.2	35.3	34.4	33.6	47.3	47.1	51.0	0.1	0.2	0.2
<b>Total</b>	<b>10,903</b>	<b>2,381,299</b>	<b>100.0</b>	<b>130,596</b>	<b>6.5</b>	<b>4.7</b>	<b>4.7</b>	<b>18.2</b>	<b>14.2</b>	<b>14.8</b>	<b>34.4</b>	<b>25.4</b>	<b>31.8</b>	<b>40.9</b>	<b>55.6</b>	<b>48.6</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indianapolis MSA	3,337	677,567	94.6	72,986	5.5	4.9	5.2	17.3	13.6	15.9	39.0	35.4	40.3	37.3	45.5	37.7	1.0	0.7	0.9
Lafayette MSA	190	29,765	5.4	5,313	2.8	1.1	3.2	12.4	11.1	14.0	45.4	49.5	42.9	39.4	38.4	39.8	0.0	0.0	0.1
<b>Total</b>	<b>3,527</b>	<b>707,332</b>	<b>100.0</b>	<b>78,299</b>	<b>5.2</b>	<b>4.7</b>	<b>5.1</b>	<b>16.9</b>	<b>13.4</b>	<b>15.8</b>	<b>39.5</b>	<b>36.1</b>	<b>40.5</b>	<b>37.4</b>	<b>45.1</b>	<b>37.8</b>	<b>0.9</b>	<b>0.7</b>	<b>0.8</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indianapolis MSA	10,360	2,302,577	95.0	121,627	22.4	9.1	8.3	17.2	19.3	18.5	19.1	21.8	20.1	41.3	49.5	35.2	0.0	0.4	17.9
Lafayette MSA	543	78,722	5.0	8,969	20.5	11.2	8.3	15.7	27.6	19.3	23.0	26.7	22.0	40.8	34.3	34.7	0.0	0.2	15.6
Total	10,903	2,381,299	100.0	130,596	22.2	9.2	8.3	17.1	19.7	18.6	19.4	22.0	20.2	41.2	48.7	35.2	0.0	0.4	17.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Indianapolis MSA	3,337	677,567	94.6	72,986	21.1	11.2	10.7	17.6	22.2	21.6	20.3	22.2	20.9	41.0	44.3	31.5	0.0	0.1	15.2
Lafayette MSA	190	29,765	5.4	5,313	20.9	11.1	8.8	16.7	26.8	20.3	20.6	27.4	21.9	41.7	34.7	36.3	0.0	0.0	12.7
Total	3,527	707,332	100.0	78,299	21.1	11.2	10.6	17.6	22.5	21.5	20.3	22.5	21.0	41.0	43.8	31.8	0.0	0.1	15.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography <span style="float: right;">2020-21</span>																			
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
Indianapolis MSA	4,212	356,586	96.5	42,692	11.5	6.9	8.6	21.2	16.1	17.3	29.0	30.4	30.4	38.1	46.2	43.5	0.2	0.3	0.2
Lafayette MSA	155	9,280	3.5	2,668	4.2	3.2	3.1	28.3	47.1	31.1	27.5	18.7	26.7	36.1	29.7	37.0	3.9	1.3	2.1
<b>Total</b>	<b>4,367</b>	<b>365,866</b>	<b>100.0</b>	<b>45,360</b>	<b>11.1</b>	<b>6.8</b>	<b>8.3</b>	<b>21.7</b>	<b>17.2</b>	<b>18.2</b>	<b>28.9</b>	<b>30.0</b>	<b>30.2</b>	<b>38.0</b>	<b>45.6</b>	<b>43.1</b>	<b>0.4</b>	<b>0.3</b>	<b>0.3</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography <span style="float: right;">2022</span>													
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Indianapolis MSA	1,021	98,076	95.7	8.8	4.3	20.1	17.2	33.3	38.9	34.5	37.4	3.2	2.2
Lafayette MSA	46	3,844	4.3	8.6	6.5	23.1	23.9	35.5	37.0	28.5	28.3	4.3	4.3
<b>Total</b>	<b>1,067</b>	<b>101,920</b>	<b>100.0</b>	<b>8.8</b>	<b>4.4</b>	<b>20.3</b>	<b>17.5</b>	<b>33.5</b>	<b>38.8</b>	<b>34.2</b>	<b>37.0</b>	<b>3.3</b>	<b>2.2</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
Indianapolis MSA	4,212	356,586	96.5	42,692	89.3	69.0	45.7	3.4	20.8	7.3	10.2
Lafayette MSA	155	9,280	3.5	2,668	86.1	70.3	46.0	3.5	21.3	10.4	8.4
<b>Total</b>	<b>4,367</b>	<b>365,866</b>	<b>100.0</b>	<b>45,360</b>	<b>89.1</b>	<b>69.0</b>	<b>45.7</b>	<b>3.4</b>	<b>20.8</b>	<b>7.5</b>	<b>10.1</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Indianapolis MSA	1,021	98,076	95.7	--	91.0	64.9	--	2.8	34.8	6.2	0.3
Lafayette MSA	46	3,844	4.3	--	88.0	78.3	--	2.8	19.6	9.1	2.2
<b>Total</b>	<b>1,067</b>	<b>101,920</b>	<b>100.0</b>	<b>--</b>	<b>90.9</b>	<b>65.5</b>	<b>--</b>	<b>2.8</b>	<b>34.1</b>	<b>6.4</b>	<b>0.4</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Indianapolis MSA	88	6,780	93.6	499	7.3	2.3	0.6	15.4	3.4	5.6	41.8	51.1	69.1	35.4	43.2	24.6	0.1	0.0	0.0
Lafayette MSA	6	410	6.4	96	1.8	0.0	1.0	13.3	0.0	4.2	35.9	83.3	47.9	49.0	16.7	46.9	0.0	0.0	0.0
Total	94	7,190	100.0	595	6.7	2.1	0.7	15.2	3.2	5.4	41.2	53.2	65.7	36.8	41.5	28.2	0.1	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Indianapolis MSA	10	342	90.9	6.6	0.0	16.9	20.0	43.6	40.0	31.6	40.0	1.3	0.0
Lafayette MSA	1	15	9.1	3.3	0.0	10.9	0.0	41.8	100.0	43.3	0.0	0.7	0.0
Total	11	357	100.0	6.3	0.0	16.3	18.2	43.4	45.5	32.9	36.4	1.2	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Indianapolis MSA	88	6,780	93.6	499	96.9	87.5	57.3	1.7	5.7	1.5	6.8
Lafayette MSA	6	410	6.4	96	96.9	50.0	47.9	1.6	50.0	1.5	0.0
<b>Total</b>	<b>94</b>	<b>7,190</b>	<b>100.0</b>	<b>595</b>	<b>96.9</b>	<b>85.1</b>	<b>55.8</b>	<b>1.6</b>	<b>8.5</b>	<b>1.5</b>	<b>6.4</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Indianapolis MSA	10	342	90.9	--	97.2	100.0	--	1.4	0.0	1.4	0.0
Lafayette MSA	1	15	9.1	--	97.1	100.0	--	1.4	0.0	1.4	0.0
<b>Total</b>	<b>11</b>	<b>357</b>	<b>100.0</b>	<b>--</b>	<b>97.2</b>	<b>100.0</b>	<b>--</b>	<b>1.4</b>	<b>0.0</b>	<b>1.4</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											



**Michigan****Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Detroit MSA	12,464	2,927,784	37.2	230,696	6.1	2.7	2.4	20.4	15.6	14.9	37.0	35.1	38.1	36.5	46.5	44.5	0.1	0.0	0.0
Flint MSA	1,182	174,452	3.5	19,036	8.5	1.9	1.5	14.9	6.9	5.3	38.5	36.0	38.8	38.1	55.1	54.3	0.0	0.0	0.0
Saginaw MSA	577	78,307	1.7	6,467	7.8	2.4	1.4	9.6	4.9	3.8	54.8	46.3	58.5	27.8	46.4	36.3	0.0	0.0	0.0
Ann Arbor MSA	1,007	284,652	3.0	18,749	6.6	6.2	6.1	12.0	11.8	11.8	44.7	40.1	45.7	36.5	41.0	36.1	0.2	0.9	0.3
Battle Creek MSA	176	20,183	0.5	5,597	5.2	5.7	2.6	21.1	18.8	19.1	42.7	44.9	42.1	31.0	30.7	36.3	0.0	0.0	0.0
Bay City MSA	301	33,479	0.9	4,152	0.7	0.7	0.8	19.9	20.9	18.3	50.4	43.2	47.7	29.1	35.2	33.2	0.0	0.0	0.0
Grand Rapids MSA	5,807	1,043,568	17.4	64,606	1.7	1.3	1.9	16.9	13.7	16.0	52.7	52.9	51.0	28.6	32.1	31.1	0.0	0.0	0.0
Jackson MSA	747	91,691	2.2	7,462	5.7	5.4	3.2	15.6	19.0	14.9	53.7	49.9	53.1	25.0	25.7	28.7	0.0	0.0	0.0
Kalamazoo MSA	401	104,079	1.2	13,719	4.9	6.5	3.1	11.1	9.7	11.1	50.7	42.9	48.6	33.3	40.9	37.1	0.1	0.0	0.1
Lansing MSA	1,147	186,529	3.4	24,799	2.5	2.5	2.3	16.5	16.0	15.1	50.8	49.4	48.6	30.1	31.9	34.0	0.1	0.1	0.1
Midland MSA	206	33,538	0.6	3,964	1.7	1.5	1.6	17.5	15.5	15.3	44.7	39.8	41.8	36.1	43.2	41.2	0.0	0.0	0.0
Monroe MSA	1,103	152,593	3.3	8,977	0.5	0.0	0.1	10.2	5.7	9.7	74.9	78.9	74.6	14.3	15.4	15.6	0.0	0.0	0.0

Muskegon MSA	972	126,870	2.9	8,878	5.0	3.0	2.7	18.8	18.7	17.1	41.9	39.2	42.9	34.3	39.1	37.2	0.0	0.0	0.0
Niles MSA	236	48,935	0.7	8,296	5.7	0.8	1.7	13.7	20.3	12.6	49.5	57.6	52.3	31.1	21.2	33.5	0.0	0.0	0.0
South Bend MSA	101	16,118	0.3	2,601	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Michigan Combined Non-MSA	7,038	1,225,860	21.0	68,435	0.0	0.0	0.0	10.1	8.4	8.1	71.8	62.2	67.1	18.1	29.4	24.7	0.0	0.0	0.0
<b>Total</b>	<b>33,465</b>	<b>6,548,638</b>	<b>100.0</b>	<b>496,434</b>	<b>4.1</b>	<b>2.0</b>	<b>2.1</b>	<b>16.4</b>	<b>13.0</b>	<b>13.3</b>	<b>48.7</b>	<b>47.3</b>	<b>46.9</b>	<b>30.6</b>	<b>37.7</b>	<b>37.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Detroit MSA	4,947	1,125,384	35.4	126,515	4.5	3.4	3.2	22.1	16.4	19.5	35.1	34.4	37.1	37.9	45.4	40.0	0.5	0.3	0.2
Flint MSA	440	59,711	3.1	11,515	6.7	2.7	2.3	17.5	9.5	11.3	33.5	27.7	34.7	39.9	56.6	49.4	2.5	3.4	2.3
Saginaw MSA	253	29,795	1.8	4,306	2.8	0.8	1.1	21.3	20.6	18.7	34.3	26.1	34.3	41.7	52.6	45.9	0.0	0.0	0.0
Ann Arbor MSA	408	105,937	2.9	9,584	4.7	6.9	5.8	8.6	7.8	10.0	46.9	47.3	49.5	39.3	37.7	34.0	0.4	0.2	0.8
Battle Creek MSA	179	19,653	1.3	3,910	3.9	1.1	4.1	21.5	34.1	22.2	41.7	33.5	41.7	33.0	31.3	32.0	0.0	0.0	0.0
Bay City MSA	199	22,191	1.4	2,746	0.0	0.0	0.0	24.0	17.1	23.7	52.4	52.3	54.2	22.9	29.1	21.0	0.7	1.5	1.1
Grand Rapids MSA	2,282	505,412	16.3	37,729	1.6	0.7	2.2	17.4	15.7	17.9	49.9	50.0	49.1	30.0	33.2	30.0	1.0	0.5	0.8
Jackson MSA	243	29,466	1.7	4,650	1.8	1.6	1.5	23.5	25.1	24.8	43.0	44.0	43.4	31.7	28.8	30.1	0.1	0.4	0.3
Kalamazoo MSA	139	28,973	1.0	8,598	2.8	5.0	3.8	18.4	15.1	20.7	42.6	33.1	38.9	36.0	46.8	36.5	0.1	0.0	0.2
Lansing MSA	393	61,899	2.8	15,302	2.2	2.8	2.5	15.2	16.8	16.9	52.3	50.6	52.4	30.2	29.5	28.0	0.1	0.3	0.2
Midland MSA	156	23,567	1.1	2,566	2.2	3.2	2.3	16.5	17.9	18.6	58.9	51.3	55.7	22.4	27.6	23.5	0.0	0.0	0.0
Monroe MSA	339	47,819	2.4	5,152	2.8	0.6	2.1	10.7	8.3	10.8	61.2	62.2	61.8	25.3	28.9	25.3	0.0	0.0	0.0

Muskegon MSA	322	41,629	2.3	5,778	5.9	5.3	5.6	10.5	10.2	12.8	52.8	48.1	51.3	30.8	36.3	30.3	0.0	0.0	0.0
Niles MSA	190	36,958	1.4	5,342	5.6	3.7	2.5	13.6	17.9	15.3	44.0	46.3	44.0	36.3	31.6	37.9	0.6	0.5	0.3
South Bend MSA	56	15,623	0.4	1,743	0.0	0.0	0.0	13.8	10.7	11.1	65.7	66.1	68.4	20.5	23.2	20.5	0.0	0.0	0.0
LS1 Michigan Combined Non-MSA	3,439	571,640	24.6	44,923	0.2	0.1	0.2	14.0	12.4	13.2	67.2	59.5	63.6	18.5	27.9	22.9	0.1	0.1	0.1
<b>Total</b>	<b>13,985</b>	<b>2,725,657</b>	<b>100.0</b>	<b>290,359</b>	<b>3.1</b>	<b>2.0</b>	<b>2.5</b>	<b>18.4</b>	<b>15.0</b>	<b>17.3</b>	<b>45.8</b>	<b>45.4</b>	<b>45.4</b>	<b>32.2</b>	<b>37.2</b>	<b>34.4</b>	<b>0.5</b>	<b>0.4</b>	<b>0.4</b>

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020-21**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit MSA	12,464	2,927,784	37.2	230,696	22.9	9.9	9.9	16.7	17.9	19.9	18.9	22.8	23.1	41.4	49.1	34.6	0.0	0.5	12.6
Flint MSA	1,182	174,452	3.5	19,036	23.6	9.2	6.2	15.4	21.9	19.9	20.0	24.6	23.4	41.0	43.0	33.8	0.0	1.3	16.8
Saginaw MSA	577	78,307	1.7	6,467	21.2	10.1	8.1	17.1	21.5	21.4	20.7	26.2	23.5	41.0	41.4	35.7	0.0	0.9	11.3
Ann Arbor MSA	1,007	284,652	3.0	18,749	22.7	11.1	10.8	17.0	19.5	20.5	19.6	18.1	22.9	40.7	50.6	35.5	0.0	0.7	10.2
Battle Creek MSA	176	20,183	0.5	5,597	21.7	9.1	6.6	17.8	21.0	20.7	19.6	26.1	23.8	40.9	43.2	36.6	0.0	0.6	12.4
Bay City MSA	301	33,479	0.9	4,152	19.5	13.0	10.6	18.1	20.6	20.8	22.2	26.6	22.6	40.2	38.9	33.4	0.0	1.0	12.6
Grand Rapids MSA	5,807	1,043,568	17.4	64,606	19.6	9.1	8.8	18.0	22.3	21.9	22.3	26.3	23.3	40.2	41.9	34.2	0.0	0.4	11.8
Jackson MSA	747	91,691	2.2	7,462	22.3	9.9	6.7	17.5	27.4	19.2	20.2	27.4	23.4	40.0	34.1	35.8	0.0	1.1	14.9
Kalamazoo MSA	401	104,079	1.2	13,719	20.5	12.2	10.2	16.6	17.0	21.4	20.0	22.2	23.4	42.9	48.4	34.3	0.0	0.2	10.8
Lansing MSA	1,147	186,529	3.4	24,799	21.0	13.9	9.7	17.3	27.3	22.9	20.7	24.8	23.9	41.0	33.0	31.3	0.0	1.1	12.3
Midland MSA	206	33,538	0.6	3,964	20.1	11.7	9.2	17.6	20.4	17.3	20.7	23.8	22.6	41.5	43.2	38.4	0.0	1.0	12.6
Monroe MSA	1,103	152,593	3.3	8,977	19.3	11.2	8.9	18.8	22.0	21.8	22.2	30.7	26.0	39.7	35.5	28.8	0.0	0.5	14.5
Muskegon MSA	972	126,870	2.9	8,878	21.7	10.0	7.8	17.0	25.3	24.0	20.6	26.0	23.6	40.7	38.0	31.4	0.0	0.7	13.3

Niles MSA	236	48,935	0.7	8,296	22.6	6.4	7.9	17.0	19.1	17.6	19.4	19.5	18.6	40.9	53.4	45.6	0.0	1.7	10.2
South Bend MSA	101	16,118	0.3	2,601	18.9	14.9	9.8	19.8	15.8	17.2	21.9	22.8	20.5	39.4	42.6	41.5	0.0	4.0	11.1
Michigan Combined Non-MSA	7,038	1,225,861	21.0	68,435	19.3	6.7	6.0	18.5	18.2	17.3	22.3	24.7	22.0	40.0	49.5	42.6	0.0	0.8	12.1
<b>Total</b>	<b>33,465</b>	<b>6,548,639</b>	<b>100.0</b>	<b>496,434</b>	<b>21.6</b>	<b>9.3</b>	<b>8.9</b>	<b>17.3</b>	<b>19.9</b>	<b>20.1</b>	<b>20.3</b>	<b>24.3</b>	<b>23.0</b>	<b>40.9</b>	<b>45.8</b>	<b>35.6</b>	<b>0.0</b>	<b>0.6</b>	<b>12.4</b>
<i>Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  Due to rounding, totals may not equal 100.0%</i>																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Detroit MSA	4,947	1,125,384	35.4	126,515	21.9	11.6	12.2	17.2	20.9	22.9	20.0	22.9	23.1	41.0	44.2	30.5	0.0	0.4	11.3
Flint MSA	440	59,711	3.1	11,515	21.3	8.2	8.3	17.5	23.0	21.9	20.8	25.7	23.2	40.5	42.7	31.5	0.0	0.5	15.0
Saginaw MSA	253	29,795	1.8	4,306	20.7	11.1	10.1	17.7	25.3	22.4	21.2	21.3	23.3	40.4	42.3	31.7	0.0	0.0	12.4
Ann Arbor MSA	408	105,937	2.9	9,584	20.8	12.7	12.1	17.7	23.5	22.0	21.4	20.1	21.9	40.1	43.4	33.4	0.0	0.2	10.5
Battle Creek MSA	179	19,653	1.3	3,910	21.9	13.4	10.1	17.2	32.4	26.7	19.8	25.7	24.9	41.2	27.9	26.7	0.0	0.6	11.7
Bay City MSA	199	22,191	1.4	2,746	21.0	14.1	14.9	17.5	25.1	24.9	20.5	25.6	22.8	41.0	35.2	25.2	0.0	0.0	12.3
Grand Rapids MSA	2,282	505,412	16.3	37,729	18.7	12.3	11.2	18.8	22.3	24.1	23.4	25.9	22.9	39.1	38.9	31.1	0.0	0.6	10.7
Jackson MSA	243	29,466	1.7	4,650	18.7	21.8	16.5	19.0	35.4	26.6	20.9	20.6	22.8	41.3	22.2	23.3	0.0	0.0	10.9
Kalamazoo MSA	139	28,973	1.0	8,598	21.5	12.2	12.1	18.3	18.0	21.9	19.7	21.6	21.9	40.5	48.2	31.4	0.0	0.0	12.7
Lansing MSA	393	61,899	2.8	15,302	20.3	16.8	12.9	17.8	30.8	25.5	22.0	24.2	23.2	39.9	27.5	26.8	0.0	0.8	11.7
Midland MSA	156	23,567	1.1	2,566	19.8	19.2	15.6	18.1	21.8	23.5	22.0	23.7	21.9	40.0	35.3	26.4	0.0	0.0	12.5
Monroe MSA	339	47,819	2.4	5,152	19.6	8.3	10.5	18.2	24.8	23.1	22.4	32.4	25.8	39.8	34.5	28.3	0.0	0.0	12.4
Muskegon MSA	322	41,629	2.3	5,778	20.4	14.9	10.4	18.7	26.4	23.9	21.2	28.6	23.0	39.8	30.1	28.0	0.0	0.0	14.8

Niles MSA	190	36,958	1.4	5,342	22.8	14.7	9.2	17.7	20.5	17.8	17.8	19.5	21.5	41.7	44.2	41.4	0.0	1.1	10.1
South Bend MSA	56	15,623	0.4	1,743	19.7	12.5	11.0	19.7	26.8	21.4	19.6	28.6	21.7	41.0	30.4	38.7	0.0	1.8	7.2
Michigan Combined Non-MSA	3,439	571,640	24.6	44,923	18.7	9.3	7.9	18.8	22.7	20.9	22.6	24.7	22.4	39.9	42.9	38.0	0.0	0.4	10.9
<b>Total</b>	<b>13,985</b>	<b>2,725,657</b>	<b>100.0</b>	<b>290,359</b>	<b>20.6</b>	<b>11.6</b>	<b>11.2</b>	<b>17.8</b>	<b>22.8</b>	<b>22.8</b>	<b>21.1</b>	<b>24.2</b>	<b>22.9</b>	<b>40.4</b>	<b>41.1</b>	<b>31.7</b>	<b>0.0</b>	<b>0.4</b>	<b>11.4</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21**

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
Detroit MSA	10,494	1,074,997	47.4	112,947	8.0	7.8	7.7	21.2	20.7	21.0	30.6	32.2	30.8	39.7	38.5	40.0	0.5	0.8	0.5
Flint MSA	1,242	126,911	5.6	5,782	10.1	13.9	8.8	13.1	12.8	12.8	42.3	42.6	40.8	34.1	30.6	37.4	0.4	0.1	0.2
Saginaw MSA	547	55,192	2.5	2,680	6.7	4.8	6.8	11.7	9.9	9.8	52.5	48.1	53.7	29.1	37.3	29.7	0.0	0.0	0.0
Ann Arbor MSA	498	31,719	2.3	8,879	9.0	9.8	8.4	9.5	12.0	9.3	42.8	43.4	45.8	32.4	30.1	31.9	6.3	4.6	4.7
Battle Creek MSA	59	6,601	0.3	1,337	8.3	10.2	9.1	26.1	22.0	26.2	33.4	35.6	32.8	32.3	32.2	31.9	0.0	0.0	0.0
Bay City MSA	207	22,931	0.9	1,229	1.4	2.4	0.9	28.1	34.3	28.2	43.0	39.1	40.5	27.4	24.2	30.4	0.0	0.0	0.0
Grand Rapids MSA	3,643	368,238	16.5	21,402	3.1	3.4	3.3	17.0	13.9	15.6	47.7	52.5	48.5	32.2	30.1	32.5	0.0	0.0	0.0
Jackson MSA	309	34,207	1.4	1,924	8.9	9.4	9.6	27.3	33.0	27.6	42.4	36.6	40.5	21.3	21.0	22.3	0.1	0.0	0.0
Kalamazoo MSA	268	32,088	1.2	4,057	8.3	6.7	8.0	19.8	18.7	18.0	45.1	50.0	45.8	26.2	24.6	28.0	0.6	0.0	0.2
Lansing MSA	893	97,422	4.0	7,424	6.6	5.4	6.4	19.8	17.0	18.8	39.5	40.5	38.9	31.7	34.8	34.6	2.4	2.2	1.3
Midland MSA	110	10,781	0.5	1,230	6.1	8.2	6.8	20.7	20.9	22.3	30.5	25.5	32.0	42.7	45.5	38.9	0.0	0.0	0.0
Monroe MSA	331	18,876	1.5	2,680	0.8	0.0	0.6	14.9	7.6	14.3	72.1	80.1	73.8	12.2	12.4	11.3	0.0	0.0	0.0

Muskegon MSA	429	39,396	1.9	2,292	8.6	9.3	9.0	21.9	27.5	23.8	33.7	29.4	33.6	35.8	33.8	33.6	0.0	0.0	0.0
Niles MSA	86	9,269	0.4	2,573	10.1	7.0	9.8	11.3	33.7	12.1	43.8	37.2	45.6	34.7	22.1	32.5	0.0	0.0	0.0
South Bend MSA	36	2,508	0.2	686	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Michigan Combined Non-MSA	2,971	239,971	13.4	24,671	0.3	0.0	0.2	12.2	11.3	10.8	66.2	61.2	65.9	21.2	27.5	23.1	0.1	0.0	0.0
<b>Total</b>	<b>22,123</b>	<b>2,171,107</b>	<b>100.0</b>	<b>201,793</b>	<b>6.3</b>	<b>6.1</b>	<b>6.2</b>	<b>18.3</b>	<b>17.5</b>	<b>18.1</b>	<b>40.9</b>	<b>42.1</b>	<b>40.0</b>	<b>33.9</b>	<b>33.7</b>	<b>35.2</b>	<b>0.7</b>	<b>0.6</b>	<b>0.6</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Detroit MSA	2,672	314,230	42.7	6.6	6.5	21.3	21.3	30.5	33.2	39.4	36.6	2.3	2.3
Flint MSA	283	33,146	4.5	5.4	2.8	18.6	24.7	33.8	29.7	36.6	33.2	5.6	9.5
Saginaw MSA	132	17,120	2.1	3.9	3.8	27.3	31.8	30.1	24.2	38.7	40.2	0.0	0.0
Ann Arbor MSA	162	14,413	2.6	7.3	5.6	8.7	11.7	39.8	42.6	39.8	34.6	4.4	5.6
Battle Creek MSA	26	1,949	0.4	5.6	3.8	30.8	34.6	37.3	30.8	26.3	30.8	0.0	0.0
Bay City MSA	84	6,873	1.3	0.0	0.0	29.6	28.6	46.5	41.7	22.4	28.6	1.5	1.2
Grand Rapids MSA	1,051	123,544	16.8	2.1	1.9	19.6	20.7	45.9	48.3	31.6	28.1	0.8	1.0
Jackson MSA	46	4,576	0.7	2.8	0.0	30.3	34.8	36.7	37.0	24.1	28.3	6.0	0.0
Kalamazoo MSA	84	10,243	1.3	6.6	9.5	18.1	23.8	40.0	39.3	34.9	26.2	0.5	1.2
Lansing MSA	236	23,295	3.8	4.5	1.3	20.6	14.8	45.0	51.7	26.8	31.4	3.2	0.8
Midland MSA	60	3,520	1.0	6.1	3.3	20.1	21.7	45.7	56.7	28.2	18.3	0.0	0.0
Monroe MSA	69	5,823	1.1	3.1	1.4	12.7	11.6	61.6	69.6	22.5	17.4	0.0	0.0
Muskegon MSA	108	14,252	1.7	11.8	12.0	16.6	28.7	44.4	30.6	27.2	28.7	0.0	0.0
Niles MSA	83	12,368	1.3	9.9	10.8	13.0	15.7	39.3	38.6	37.3	34.9	0.5	0.0
South Bend MSA	21	1,284	0.3	0.0	0.0	11.9	19.0	71.1	76.2	17.1	4.8	0.0	0.0
Michigan Combined Non-MSA	1,135	111,229	18.2	0.3	0.1	15.5	15.1	62.8	58.7	21.0	26.0	0.4	0.2
<b>Total</b>	<b>6,252</b>	<b>697,865</b>	<b>100.0</b>	<b>5.0</b>	<b>4.1</b>	<b>19.6</b>	<b>20.2</b>	<b>39.4</b>	<b>42.0</b>	<b>34.1</b>	<b>31.9</b>	<b>1.9</b>	<b>1.8</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21**

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
Detroit MSA	10,494	1,074,997	47.4	112,947	87.2	65.2	46.1	4.9	23.2	7.9	11.6
Flint MSA	1,242	126,911	5.6	5,782	85.0	65.1	41.8	4.6	23.8	10.3	11.0
Saginaw MSA	547	55,192	2.5	2,680	78.9	68.0	42.3	6.3	21.9	14.8	10.1
Ann Arbor MSA	498	31,719	2.3	8,879	85.9	73.1	45.2	4.8	14.3	9.3	12.7
Battle Creek MSA	59	6,601	0.3	1,337	79.7	64.4	46.0	6.3	15.3	14.0	20.3
Bay City MSA	207	22,931	0.9	1,229	81.0	63.8	47.1	5.5	32.4	13.5	3.9
Grand Rapids MSA	3,643	368,238	16.5	21,402	83.8	64.6	44.3	6.2	24.1	10.0	11.4
Jackson MSA	309	34,207	1.4	1,924	82.4	61.8	44.6	6.3	28.2	11.4	10.0
Kalamazoo MSA	268	32,088	1.2	4,057	82.6	61.6	47.8	6.0	31.3	11.4	7.1
Lansing MSA	893	97,422	4.0	7,424	83.1	62.3	47.9	4.9	26.4	12.0	11.3
Midland MSA	110	10,781	0.5	1,230	83.3	80.9	56.8	5.1	10.9	11.6	8.2
Monroe MSA	331	18,876	1.5	2,680	85.0	74.6	59.6	4.6	14.2	10.4	11.2
Muskegon MSA	429	39,396	1.9	2,292	83.2	65.5	47.6	5.9	23.3	11.0	11.2
Niles MSA	86	9,269	0.4	2,573	83.4	55.8	49.7	5.3	40.7	11.4	3.5
South Bend MSA	36	2,508	0.2	686	84.6	77.8	50.9	4.7	19.4	10.7	2.8
Michigan Combined Non-MSA	2,971	239,971	13.4	24,671	82.7	68.8	50.1	5.0	21.2	12.3	10.0
<b>Total</b>	<b>22,123</b>	<b>2,171,107</b>	<b>100.0</b>	<b>201,793</b>	<b>85.3</b>	<b>65.8</b>	<b>46.6</b>	<b>5.1</b>	<b>23.1</b>	<b>9.6</b>	<b>11.1</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Detroit MS A	2,672	314,230	42.7	--	87.4	67.5	--	4.6	32.3	8.0	0.2
Flint MSA	283	33,146	4.5	--	85.4	66.1	--	4.4	33.6	10.2	0.4
Saginaw MSA	132	17,120	2.1	--	79.3	70.5	--	6.1	29.5	14.5	0.0
Ann Arbor MSA	162	14,413	2.6	--	86.0	71.0	--	4.5	29.0	9.4	0.0
Battle Creek MSA	26	1,949	0.4	--	79.9	73.1	--	5.9	26.9	14.2	0.0
Bay City MSA	84	6,873	1.3	--	81.3	73.8	--	5.2	26.2	13.5	0.0
Grand Rapids MSA	1,051	123,544	16.8	--	83.7	61.1	--	6.0	38.7	10.3	0.2
Jackson MSA	46	4,576	0.7	--	82.0	69.6	--	6.4	30.4	11.6	0.0
Kalamazoo MSA	84	10,243	1.3	--	82.7	66.7	--	5.8	31.0	11.5	2.4
Lansing MSA	236	23,295	3.8	--	83.3	67.4	--	4.7	32.2	12.0	0.4
Midland MSA	60	3,520	1.0	--	83.4	80.0	--	5.0	20.0	11.6	0.0
Monroe MSA	69	5,823	1.1	--	85.0	72.5	--	4.5	23.2	10.5	4.3
Muskegon MSA	108	14,252	1.7	--	83.2	63.9	--	5.8	36.1	11.0	0.0
Niles MSA	83	12,368	1.3	--	83.8	50.6	--	4.9	49.4	11.3	0.0
South Bend MSA	21	1,284	0.3	--	85.2	81.0	--	4.4	19.0	10.4	0.0
Michigan Combined Non-MSA	1,135	111,229	18.2	--	82.8	69.3	--	4.9	30.6	12.4	0.2
<b>Total</b>	<b>6,252</b>	<b>697,865</b>	<b>100.0</b>	<b>--</b>	<b>85.4</b>	<b>66.9</b>	<b>--</b>	<b>4.9</b>	<b>32.9</b>	<b>9.7</b>	<b>0.3</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Detroit MSA	170	12,465	30.6	472	5.2	4.1	1.9	19.4	17.6	22.0	42.6	43.5	48.3	32.6	34.1	27.8	0.3	0.6	0.0
Flint MSA	22	1,316	4.0	59	2.9	0.0	0.0	6.7	0.0	3.4	39.8	36.4	33.9	50.5	63.6	62.7	0.0	0.0	0.0
Saginaw MSA	17	963	3.1	122	1.1	0.0	0.0	3.0	0.0	0.0	58.9	58.8	59.0	37.0	41.2	41.0	0.0	0.0	0.0
Ann Arbor MSA	14	453	2.5	88	3.4	0.0	1.1	6.4	0.0	3.4	57.0	42.9	73.9	32.8	57.1	21.6	0.4	0.0	0.0
Battle Creek MSA	0	0	0.0	72	2.0	0.0	1.4	8.3	0.0	2.8	63.4	0.0	83.3	26.3	0.0	12.5	0.0	0.0	0.0
Bay City MSA	8	362	1.4	63	0.9	0.0	0.0	7.1	12.5	0.0	62.5	62.5	68.3	29.5	25.0	31.7	0.0	0.0	0.0
Grand Rapids MSA	97	6,851	17.4	422	0.8	0.0	2.1	14.2	9.3	15.2	55.8	54.6	58.8	29.2	36.1	23.9	0.0	0.0	0.0
Jackson MSA	4	313	0.7	65	1.6	0.0	0.0	8.9	0.0	3.1	66.1	50.0	76.9	23.5	50.0	20.0	0.0	0.0	0.0
Kalamazoo MSA	3	94	0.5	62	3.8	0.0	0.0	13.5	0.0	11.3	53.3	100.0	61.3	29.1	0.0	27.4	0.3	0.0	0.0
Lansing MSA	21	1,691	3.8	245	2.0	0.0	0.8	7.8	14.3	3.3	62.0	61.9	66.1	27.6	23.8	29.8	0.7	0.0	0.0
Midland MSA	5	180	0.9	64	0.0	0.0	0.0	19.4	0.0	17.2	52.4	40.0	78.1	28.2	60.0	4.7	0.0	0.0	0.0
Monroe MSA	18	1,087	3.2	130	0.2	0.0	0.0	4.2	0.0	0.0	82.7	94.4	86.9	12.9	5.6	13.1	0.0	0.0	0.0
Muskegon MSA	9	227	1.6	40	5.9	0.0	0.0	8.1	0.0	10.0	53.6	66.7	50.0	32.4	33.3	40.0	0.0	0.0	0.0
Niles MSA	5	755	0.9	66	1.8	0.0	0.0	5.8	20.0	4.5	67.6	20.0	71.2	24.7	60.0	24.2	0.0	0.0	0.0

South Bend MSA	1	30	0.2	44	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Michigan Combined Non-MSA	162	9,754	29.1	1,949	0.0	0.0	0.2	5.1	4.3	2.6	78.3	72.8	85.7	16.6	22.8	11.5	0.0	0.0	0.0
<b>Total</b>	<b>556</b>	<b>36,541</b>	<b>100.0</b>	<b>3,963</b>	<b>2.3</b>	<b>1.3</b>	<b>0.7</b>	<b>11.0</b>	<b>9.2</b>	<b>6.6</b>	<b>60.2</b>	<b>57.4</b>	<b>73.9</b>	<b>26.4</b>	<b>32.0</b>	<b>18.8</b>	<b>0.2</b>	<b>0.2</b>	<b>0.0</b>
<i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Detroit MSA	22	1,648	11.5	4.3	9.1	21.0	22.7	40.7	31.8	33.1	36.4	0.9	0.0
Flint MSA	4	156	2.1	2.8	0.0	10.3	0.0	39.1	25.0	45.9	75.0	1.9	0.0
Saginaw MSA	11	1,215	5.8	0.5	0.0	8.1	0.0	44.5	36.4	46.9	63.6	0.0	0.0
Ann Arbor MSA	7	113	3.7	2.9	0.0	5.1	0.0	61.1	71.4	30.6	28.6	0.3	0.0
Battle Creek MSA	4	372	2.1	1.3	0.0	15.2	0.0	51.5	50.0	32.1	50.0	0.0	0.0
Bay City MSA	7	158	3.7	0.0	0.0	9.8	14.3	61.2	57.1	28.1	28.6	0.9	0.0
Grand Rapids MSA	22	1,529	11.5	0.7	0.0	16.1	27.3	52.4	31.8	30.3	36.4	0.5	4.5
Jackson MSA	3	120	1.6	0.4	0.0	12.8	0.0	54.5	100.0	32.1	0.0	0.2	0.0
Kalamazoo MSA	1	5	0.5	3.2	0.0	17.3	0.0	42.3	100.0	37.1	0.0	0.2	0.0
Lansing MSA	6	453	3.1	1.3	0.0	8.3	0.0	58.4	83.3	31.0	16.7	1.0	0.0
Midland MSA	6	175	3.1	0.4	0.0	19.7	66.7	61.9	33.3	17.9	0.0	0.0	0.0
Monroe MSA	4	596	2.1	1.1	0.0	7.2	0.0	71.8	50.0	20.0	50.0	0.0	0.0
Muskegon MSA	0	0	0.0	4.9	0.0	9.8	0.0	58.5	0.0	26.8	0.0	0.0	0.0
Niles MSA	4	472	2.1	1.8	0.0	11.2	0.0	56.9	50.0	29.9	50.0	0.2	0.0
South Bend MSA	4	129	2.1	0.0	0.0	10.1	0.0	68.8	0.0	21.1	100.0	0.0	0.0
Michigan Combined Non-MSA	86	5,805	45.0	0.2	0.0	8.2	8.1	72.7	74.4	18.9	17.4	0.1	0.0
<b>Total</b>	<b>191</b>	<b>12,946</b>	<b>100.0</b>	<b>1.9</b>	<b>1.0</b>	<b>13.4</b>	<b>12.0</b>	<b>55.8</b>	<b>57.1</b>	<b>28.3</b>	<b>29.3</b>	<b>0.5</b>	<b>0.5</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													



Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Detroit MS A	170	12,465	30.6	472	96.0	82.9	58.3	2.3	10.6	1.7	6.5
Flint MSA	22	1,316	4.0	59	95.8	59.1	35.6	2.9	18.2	1.2	22.7
Saginaw M SA	17	963	3.1	122	97.2	88.2	58.2	1.4	5.9	1.4	5.9
Ann Arbor MSA	14	453	2.5	88	96.0	100.0	51.1	2.4	0.0	1.7	0.0
Battle Creek MSA	--	--	--	72	96.0	--	34.7	2.5	--	1.5	--
Bay City MSA	8	362	1.4	63	97.9	100.0	49.2	0.9	0.0	1.2	0.0
Grand Rapids MSA	97	6,851	17.4	422	94.3	77.3	47.2	4.1	11.3	1.6	11.3
Jackson MSA	4	313	0.7	65	98.4	75.0	46.2	0.9	25.0	0.7	0.0
Kalamazoo MSA	3	94	0.5	62	92.4	66.7	38.7	5.0	33.3	2.6	0.0
Lansing MSA	21	1,691	3.8	245	96.5	85.7	37.6	2.0	9.5	1.5	4.8
Midland MSA	5	180	0.9	64	97.4	80.0	70.3	2.6	20.0	0.0	0.0
Monroe MSA	18	1,087	3.2	130	96.9	83.3	65.4	2.1	11.1	1.0	5.6
Muskegon MSA	9	227	1.6	40	96.0	77.8	42.5	3.4	11.1	0.6	11.1
Niles MSA	5	755	0.9	66	96.0	80.0	63.6	3.3	20.0	0.7	0.0
South Bend MSA	1	30	0.2	44	97.7	100.0	34.1	2.0	0.0	0.3	0.0
Michigan Combined Non-MSA	162	9,754	29.1	1,949	96.8	79.6	46.5	2.2	15.4	1.1	4.9
<b>Total</b>	<b>556</b>	<b>36,541</b>	<b>100.0</b>	<b>3,963</b>	<b>96.1</b>	<b>80.8</b>	<b>48.5</b>	<b>2.5</b>	<b>12.2</b>	<b>1.4</b>	<b>7.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Detroit MSA	22	1,648	11.5	--	96.1	81.8	--	2.1	18.2	1.8	0.0
Flint MSA	4	156	2.1	--	96.1	75.0	--	2.7	25.0	1.2	0.0
Saginaw MSA	11	1,215	5.8	--	97.2	100.0	--	1.6	0.0	1.2	0.0
Ann Arbor MSA	7	113	3.7	--	95.9	85.7	--	2.4	14.3	1.6	0.0
Battle Creek MSA	4	372	2.1	--	96.0	75.0	--	2.5	0.0	1.5	25.0
Bay City MSA	7	158	3.7	--	97.9	57.1	--	0.9	42.9	1.2	0.0
Grand Rapids MSA	22	1,529	11.5	--	94.3	63.6	--	4.0	36.4	1.7	0.0
Jackson MSA	3	120	1.6	--	98.2	66.7	--	1.1	33.3	0.7	0.0
Kalamazoo MSA	1	5	0.5	--	92.8	100.0	--	4.7	0.0	2.6	0.0
Lansing MSA	6	453	3.1	--	96.5	16.7	--	2.0	83.3	1.6	0.0
Midland MSA	6	175	3.1	--	98.7	83.3	--	1.3	16.7	0.0	0.0
Monroe MSA	4	596	2.1	--	96.5	50.0	--	2.5	50.0	1.1	0.0
Muskegon MSA	--	--	--	--	96.3	--	--	3.0	--	0.6	--
Niles MSA	4	472	2.1	--	96.4	75.0	--	3.0	25.0	0.7	0.0
South Bend MSA	4	129	2.1	--	97.3	100.0	--	2.0	0.0	0.7	0.0
Michigan Combined Non-MSA	86	5,805	45.0	--	96.9	83.7	--	2.1	16.3	1.1	0.0
<b>Total</b>	<b>191</b>	<b>12,946</b>	<b>100.0</b>	<b>--</b>	<b>96.2</b>	<b>78.0</b>	<b>--</b>	<b>2.4</b>	<b>21.5</b>	<b>1.4</b>	<b>0.5</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Minnesota****Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Minneapolis MSA	897	270,442	96.3	229,863	2.2	2.1	2.4	14.5	14.3	13.1	48.9	44.9	48.3	34.3	38.7	36.1	0.1	0.0	0.1
Duluth MSA	14	5,930	1.5	8,992	2.1	0.0	3.6	14.9	0.0	13.0	55.5	35.7	50.6	27.5	64.3	32.7	0.0	0.0	0.0
Mankato MSA	6	918	0.6	2,905	0.0	0.0	0.0	12.0	0.0	13.0	80.1	100.0	80.9	7.9	0.0	6.1	0.0	0.0	0.0
St Cloud MSA	10	1,986	1.1	9,821	0.0	0.0	0.0	7.9	20.0	9.1	76.5	70.0	72.1	15.7	10.0	18.9	0.0	0.0	0.0
Minnesota Non-MSA	4	608	0.4	3,360	0.0	0.0	0.0	5.8	0.0	4.5	50.9	25.0	47.0	43.3	75.0	48.5	0.0	0.0	0.0
<b>Total</b>	<b>931</b>	<b>279,884</b>	<b>100.0</b>	<b>254,941</b>	<b>2.0</b>	<b>2.0</b>	<b>2.3</b>	<b>14.0</b>	<b>14.0</b>	<b>12.9</b>	<b>51.2</b>	<b>45.3</b>	<b>49.7</b>	<b>32.7</b>	<b>38.7</b>	<b>35.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography <span style="float: right;">2022</span>																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Minneapolis MSA	1,720	402,941	96.2	113,396	2.4	2.1	3.0	16.4	16.3	16.9	48.3	41.9	47.0	32.9	39.7	32.9	0.1	0.0	0.2
Duluth MSA	15	3,296	0.8	5,096	0.7	0.0	1.0	17.3	0.0	18.8	51.0	46.7	46.4	30.5	53.3	33.2	0.4	0.0	0.5
Mankato MSA	25	5,233	1.4	1,463	0.0	0.0	0.0	17.0	20.0	20.6	77.5	76.0	74.2	5.5	4.0	5.1	0.0	0.0	0.0
St Cloud MSA	21	2,551	1.2	5,223	0.1	0.0	0.5	12.0	28.6	16.3	68.5	42.9	65.2	19.4	28.6	18.0	0.1	0.0	0.1
Minnesota Non-MSA	7	767	0.4	1,730	0.0	0.0	0.0	12.6	0.0	13.5	30.7	28.6	30.4	56.7	71.4	56.1	0.0	0.0	0.0
<b>Total</b>	<b>1,788</b>	<b>414,788</b>	<b>100.0</b>	<b>126,908</b>	<b>2.1</b>	<b>2.0</b>	<b>2.7</b>	<b>16.2</b>	<b>16.3</b>	<b>17.0</b>	<b>49.6</b>	<b>42.3</b>	<b>47.8</b>	<b>32.0</b>	<b>39.3</b>	<b>32.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Minneapolis MSA	897	270,443	96.3	229,863	20.2	14.0	8.7	17.2	27.4	21.0	22.0	21.3	21.6	40.5	35.7	31.8	0.0	1.6	16.9
Duluth MSA	14	5,930	1.5	8,992	19.9	0.0	8.2	17.0	7.1	16.9	22.9	0.0	22.2	40.2	92.9	34.8	0.0	0.0	17.9
Mankato MSA	6	918	0.6	2,905	20.9	16.7	8.5	17.6	33.3	24.0	22.9	16.7	22.9	38.5	33.3	29.0	0.0	0.0	15.6
St Cloud MSA	10	1,986	1.1	9,821	20.0	20.0	7.9	17.5	50.0	23.4	23.0	20.0	21.9	39.5	10.0	29.4	0.0	0.0	17.4
Minnesota Non-MSA	4	608	0.4	3,360	16.6	0.0	2.8	13.4	0.0	17.2	22.9	0.0	24.3	47.1	100.0	38.1	0.0	0.0	17.6
Total	931	279,884	100.0	254,941	20.2	13.9	8.6	17.2	27.3	21.0	22.1	20.8	21.7	40.5	36.5	31.9	0.0	1.5	16.9
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Minneapolis MSA	1,720	402,941	96.2	113,396	19.5	13.9	11.1	17.9	25.9	23.7	22.8	23.2	21.7	39.9	36.9	27.7	0.0	0.1	15.8
Duluth MSA	15	3,296	0.8	5,096	18.4	13.3	11.7	18.4	33.3	22.0	22.5	20.0	21.0	40.7	33.3	29.0	0.0	0.0	16.4
Mankato MSA	25	5,233	1.4	1,463	22.1	20.0	13.8	17.9	16.0	25.3	24.6	32.0	21.8	35.4	32.0	24.4	0.0	0.0	14.7
St Cloud MSA	21	2,551	1.2	5,223	18.5	4.8	10.6	18.6	38.1	24.2	24.1	23.8	22.0	38.8	33.3	25.9	0.0	0.0	17.3
Minnesota Non-MSA	7	767	0.4	1,730	15.5	0.0	5.5	14.8	28.6	20.0	21.0	28.6	26.0	48.8	42.9	33.6	0.0	0.0	14.9
Total	1,788	414,788	100.0	126,908	19.4	13.8	11.0	17.9	26.0	23.6	22.8	23.3	21.8	39.9	36.7	27.7	0.0	0.1	15.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Minneapolis MSA	525	30,982	78.1	85,710	5.1	3.0	5.0	16.6	15.4	16.0	45.1	53.7	44.9	33.0	27.8	33.9	0.3	0.0	0.2
Duluth MSA	51	2,414	7.6	3,441	7.7	15.7	7.7	23.0	25.5	23.3	44.4	29.4	41.6	24.9	29.4	27.4	0.0	0.0	0.0
Mankato MSA	17	561	2.5	1,242	0.0	0.0	0.0	26.8	17.6	27.1	68.1	70.6	67.5	5.1	11.8	5.5	0.0	0.0	0.0
St Cloud MSA	63	3,163	9.4	3,399	0.0	0.0	0.0	14.1	12.7	15.6	68.5	81.0	67.6	17.4	6.3	16.8	0.0	0.0	0.0
Minnesota Non-MSA	16	643	2.4	1,235	0.0	0.0	0.0	5.3	6.3	4.2	52.0	68.8	43.0	42.7	25.0	52.8	0.0	0.0	0.0
Total	672	37,763	100.0	95,027	4.8	3.6	4.8	16.8	15.8	16.3	46.5	55.2	45.9	31.7	25.4	32.9	0.3	0.0	0.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Minneapolis MSA	590	48,567	90.6	4.1	2.4	17.8	19.3	42.5	44.9	34.7	33.2	0.8	0.2
Duluth MSA	16	1,998	2.5	3.7	0.0	14.3	12.5	42.6	37.5	29.8	50.0	9.6	0.0
Mankato MSA	18	1,149	2.8	0.0	0.0	30.4	44.4	66.3	55.6	3.3	0.0	0.0	0.0
St Cloud MSA	18	1,326	2.8	0.5	0.0	16.4	16.7	63.5	72.2	16.6	11.1	3.0	0.0
Minnesota Non-MSA	9	636	1.4	0.0	0.0	15.8	44.4	28.4	0.0	55.8	55.6	0.0	0.0
<b>Total</b>	<b>651</b>	<b>53,676</b>	<b>100.0</b>	<b>3.9</b>	<b>2.2</b>	<b>17.8</b>	<b>20.1</b>	<b>43.5</b>	<b>45.2</b>	<b>33.6</b>	<b>32.4</b>	<b>1.2</b>	<b>0.2</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													



Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
Minneapolis MSA	525	30,982	78.1	85,710	88.2	60.6	50.4	4.4	39.4	7.4	0.0
Duluth MSA	51	2,414	7.6	3,441	82.6	66.7	53.9	4.7	33.3	12.7	0.0
Mankato MSA	17	561	2.5	1,242	81.9	58.8	49.5	5.6	41.2	12.5	0.0
St Cloud MSA	63	3,163	9.4	3,399	84.5	68.3	44.1	5.5	31.7	10.0	0.0
Minnesota Non-MSA	16	643	2.4	1,235	87.8	62.5	47.5	4.0	37.5	8.1	0.0
<b>Total</b>	<b>672</b>	<b>37,763</b>	<b>100.0</b>	<b>95,027</b>	<b>87.7</b>	<b>61.8</b>	<b>50.3</b>	<b>4.4</b>	<b>38.2</b>	<b>7.8</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Minneapolis MSA	590	48,567	90.6	--	89.7	70.8	--	3.6	29.2	6.7	0.0
Duluth MSA	16	1,998	2.5	--	84.1	56.3	--	4.2	43.8	11.7	0.0
Mankato MSA	18	1,149	2.8	--	84.1	61.1	--	4.7	38.9	11.2	0.0
St Cloud MSA	18	1,326	2.8	--	86.5	72.2	--	4.6	27.8	8.9	0.0
Minnesota Non MSA	9	636	1.4	--	88.9	77.8	--	3.5	22.2	7.6	0.0
<b>Total</b>	<b>651</b>	<b>53,676</b>	<b>100.0</b>	<b>--</b>	<b>89.2</b>	<b>70.4</b>	<b>--</b>	<b>3.7</b>	<b>29.6</b>	<b>7.1</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Minneapolis MSA	5	247	50.0	698	1.9	0.0	0.7	10.9	0.0	3.2	54.6	80.0	68.1	32.5	20.0	28.1	0.1	0.0	0.0
Duluth MSA	0	0	0.0	48	4.5	0.0	0.0	10.7	0.0	10.4	54.2	0.0	56.3	30.6	0.0	33.3	0.0	0.0	0.0
Mankato MSA	2	51	20.0	124	0.0	0.0	0.0	4.5	0.0	0.8	77.7	50.0	71.8	17.8	50.0	27.4	0.0	0.0	0.0
St Cloud MSA	1	31	10.0	288	0.0	0.0	0.0	2.6	0.0	0.0	89.6	100.0	95.5	7.7	0.0	4.5	0.0	0.0	0.0
Minnesota Non-MSA	2	56	20.0	172	0.0	0.0	0.0	1.7	0.0	0.6	27.2	0.0	19.8	71.2	100.0	79.7	0.0	0.0	0.0
Total	10	385	100.0	1,330	1.6	0.0	0.4	9.2	0.0	2.2	58.9	60.0	67.7	30.2	40.0	29.8	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis MSA	9	433	75.0	1.8	0.0	13.5	22.2	51.1	66.7	33.4	11.1	0.2	0.0
Duluth MSA	0	0	0.0	0.8	0.0	10.6	0.0	53.9	0.0	30.9	0.0	3.8	0.0
Mankato MSA	0	0	0.0	0.0	0.0	6.3	0.0	92.4	0.0	1.3	0.0	0.0	0.0
St Cloud MSA	3	108	25.0	0.0	0.0	4.6	0.0	78.6	100.0	16.7	0.0	0.1	0.0
Minnesota Non-MSA	0	0	0.0	0.0	0.0	5.8	0.0	7.6	0.0	86.6	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>541</b>	<b>100.0</b>	<b>1.4</b>	<b>0.0</b>	<b>11.7</b>	<b>16.7</b>	<b>54.7</b>	<b>75.0</b>	<b>31.9</b>	<b>8.3</b>	<b>0.3</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis MSA	5	247	50.0	698	96.3	40.0	57.5	2.1	60.0	1.5	0.0
Duluth MSA	--	--	--	48	97.3	--	79.2	1.4	--	1.4	--
Mankato MSA	2	51	20.0	124	96.3	100.0	33.1	2.5	0.0	1.2	0.0
St Cloud MSA	1	31	10.0	288	97.7	100.0	55.2	1.4	0.0	1.0	0.0
Minnesota Non-MSA	2	56	20.0	172	97.9	0.0	61.6	1.7	100.0	0.5	0.0
<b>Total</b>	<b>10</b>	<b>385</b>	<b>100.0</b>	<b>1,330</b>	<b>96.6</b>	<b>50.0</b>	<b>56.0</b>	<b>2.0</b>	<b>50.0</b>	<b>1.4</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2022**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Minneapolis MSA	9	433	75.0	--	96.5	88.9	--	2.0	11.1	1.5	0.0
Duluth MSA	--	--	--	--	97.9	--	--	0.8	--	1.3	--
Mankato MSA	--	--	--	--	96.6	--	--	2.3	--	1.1	--
St Cloud MSA	3	108	25.0	--	97.7	100.0	--	1.3	0.0	1.0	0.0
Minnesota Non-MSA	--	--	--	--	97.8	--	--	1.6	--	0.7	--
<b>Total</b>	<b>12</b>	<b>541</b>	<b>100.0</b>	<b>--</b>	<b>96.7</b>	<b>91.7</b>	<b>--</b>	<b>1.8</b>	<b>8.3</b>	<b>1.4</b>	<b>0.0</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.

Due to rounding, totals may not equal 100.0%

## Ohio

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland MSA	17,145	2,828,023	23.4	104,135	6.5	2.7	3.5	16.2	11.3	13.1	37.9	36.7	37.8	39.2	49.2	45.6	0.2	0.0	0.0
Columbus MSA	19,773	4,474,466	27.0	123,262	5.1	3.7	4.8	17.8	12.9	15.5	36.5	28.8	33.3	40.6	54.5	46.3	0.0	0.0	0.0
Toledo MSA	7,006	945,148	9.6	26,478	6.3	1.9	1.8	11.0	7.5	7.1	47.4	43.8	45.4	35.3	46.8	45.7	0.0	0.0	0.0
Akron MSA	7,515	1,060,022	10.3	35,651	5.7	3.7	3.4	17.7	15.3	14.7	44.9	44.1	44.0	31.7	36.9	37.9	0.0	0.0	0.0
Canton MSA	5,918	821,285	8.1	19,095	3.4	1.1	1.3	8.2	4.7	5.0	69.8	69.4	69.9	18.6	24.7	23.9	0.0	0.0	0.0
Dayton MSA	2,913	514,220	4.0	41,509	5.7	3.4	2.9	16.3	9.6	12.7	45.6	41.4	45.0	32.4	45.6	39.4	0.0	0.0	0.0
Lima MSA	331	40,410	0.5	3,793	2.7	1.2	1.6	12.8	10.9	9.5	52.7	50.2	49.5	31.9	37.8	39.3	0.0	0.0	0.0
Mansfield MSA	594	63,895	0.8	4,563	2.2	0.7	0.7	13.6	11.4	10.1	57.9	61.8	58.8	26.3	26.1	30.3	0.0	0.0	0.0
Springfield MSA	544	64,707	0.7	5,848	3.1	1.7	1.0	20.2	15.6	18.4	46.6	43.2	47.1	30.1	39.5	33.6	0.0	0.0	0.0
Wheeling MSA	384	46,417	0.5	1,949	0.0	0.0	0.0	15.9	12.8	14.3	72.6	64.8	69.0	11.4	22.4	16.7	0.0	0.0	0.0
Ohio Combined Non-MSA	11,130	1,309,139	15.2	53,769	0.5	0.3	0.3	12.7	12.3	12.1	65.0	64.3	63.9	21.8	23.2	23.6	0.0	0.0	0.0
<b>Total</b>	<b>73,253</b>	<b>12,167,733</b>	<b>100.0</b>	<b>420,052</b>	<b>4.5</b>	<b>2.5</b>	<b>3.1</b>	<b>15.2</b>	<b>11.4</b>	<b>13.0</b>	<b>47.4</b>	<b>43.5</b>	<b>43.6</b>	<b>32.8</b>	<b>42.6</b>	<b>40.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cleveland MSA	6,428	922,028	24.4	66,692	5.7	3.9	4.5	15.0	11.7	14.1	39.9	41.2	40.8	38.5	42.9	40.1	0.9	0.3	0.5
Columbus MSA	6,495	1,475,729	24.7	72,388	4.5	3.6	5.6	16.3	10.2	15.4	38.7	32.2	37.4	40.3	53.6	41.2	0.2	0.3	0.5
Toledo MSA	2,502	319,359	9.5	17,314	4.5	2.1	2.3	14.7	11.3	13.1	41.2	39.6	40.2	37.7	45.9	43.2	1.9	1.1	1.2
Akron MSA	2,729	392,579	10.4	23,435	5.1	3.6	4.7	17.4	14.4	16.7	42.8	43.2	41.8	34.5	38.7	36.6	0.1	0.1	0.3
Canton MSA	2,134	292,305	8.1	13,014	3.2	2.2	2.5	10.3	8.1	10.5	56.6	57.5	55.8	29.9	32.3	31.2	0.0	0.0	0.0
Dayton MSA	1,139	216,249	4.3	25,567	5.2	4.0	3.7	17.5	12.6	16.4	41.1	38.3	41.0	35.9	45.2	38.8	0.2	0.0	0.2
Lima MSA	95	11,410	0.4	2,843	5.1	3.2	2.9	18.7	12.6	20.4	50.3	45.3	46.4	25.9	38.9	30.3	0.0	0.0	0.0
Mansfield MSA	235	26,503	0.9	3,367	6.9	6.4	6.6	9.1	8.1	10.0	55.1	51.9	53.0	28.9	33.6	30.5	0.0	0.0	0.0
Springfield MSA	196	23,057	0.7	3,945	4.4	3.6	2.2	14.6	18.9	17.6	42.8	44.9	44.9	38.1	32.7	35.3	0.0	0.0	0.0
Wheeling MSA	124	14,428	0.5	1,357	0.0	0.0	0.0	25.2	9.7	21.5	56.9	52.4	52.9	17.9	37.9	25.6	0.0	0.0	0.0
Ohio Combined Non-MSA	4,252	483,954	16.1	37,593	0.8	1.0	1.0	13.9	13.0	14.1	65.5	66.6	64.3	19.8	19.4	20.5	0.1	0.0	0.1
<b>Total</b>	<b>26,329</b>	<b>4,177,600</b>	<b>100.0</b>	<b>267,515</b>	<b>4.2</b>	<b>3.0</b>	<b>3.9</b>	<b>15.3</b>	<b>11.5</b>	<b>14.8</b>	<b>46.3</b>	<b>44.5</b>	<b>44.3</b>	<b>33.8</b>	<b>40.6</b>	<b>36.6</b>	<b>0.5</b>	<b>0.3</b>	<b>0.4</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland MSA	17,145	2,828,024	23.4	104,135	22.8	9.9	8.7	16.7	22.3	19.0	19.3	24.6	21.7	41.2	42.8	36.2	0.0	0.4	14.4
Columbus MSA	19,773	4,474,466	27.0	123,262	21.8	6.8	7.0	16.8	16.7	18.1	19.4	21.5	20.3	41.9	54.3	38.0	0.0	0.6	16.6
Toledo MSA	7,006	945,148	9.6	26,478	22.5	8.6	6.9	16.5	21.3	19.1	19.9	26.8	22.4	41.2	42.9	39.6	0.0	0.4	12.0
Akron MSA	7,515	1,060,022	10.3	35,651	21.4	13.7	11.8	16.9	23.6	21.1	20.8	24.3	21.0	40.9	38.1	31.7	0.0	0.3	14.4
Canton MSA	5,918	821,285	8.1	19,095	19.6	10.2	8.3	18.7	22.8	20.0	21.9	26.4	22.8	39.8	40.3	33.6	0.0	0.3	15.3
Dayton MSA	2,913	514,221	4.0	41,509	22.6	8.8	8.2	17.0	20.0	18.8	19.6	23.7	20.7	40.9	46.9	33.3	0.0	0.7	19.1
Lima MSA	331	40,411	0.5	3,793	21.7	11.5	7.5	17.0	20.8	20.8	21.6	26.3	22.9	39.7	41.1	33.5	0.0	0.3	15.2
Mansfield MSA	594	63,895	0.8	4,563	20.6	10.3	6.5	18.5	25.9	19.9	20.9	25.1	23.2	40.0	38.4	35.4	0.0	0.3	15.0
Springfield MSA	544	64,707	0.7	5,848	20.9	8.8	6.7	17.4	27.4	18.9	20.9	22.1	21.6	40.8	41.4	32.8	0.0	0.4	20.0
Wheeling MSA	384	46,417	0.5	1,949	18.8	8.9	7.2	19.9	18.5	17.0	21.2	24.5	20.9	40.0	47.9	36.3	0.0	0.3	18.6
Ohio Combined Non-MSA	11,130	1,309,139	15.2	53,769	19.6	8.6	7.0	18.1	22.4	19.7	21.9	26.8	23.3	40.3	41.6	34.2	0.0	0.6	15.7
Total	73,253	12,167,733	100.0	420,052	21.6	9.1	8.0	17.2	20.8	19.1	20.2	24.4	21.4	41.0	45.2	35.8	0.0	0.5	15.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland MSA	6,428	922,028	24.4	66,692	22.3	12.4	9.7	17.2	23.9	21.2	19.5	24.5	21.1	41.1	39.1	33.7	0.0	0.2	14.2
Columbus MSA	6,495	1,475,729	24.7	72,388	21.5	7.9	8.5	17.1	17.8	19.4	20.2	22.6	21.3	41.2	51.5	35.3	0.0	0.2	15.4
Toledo MSA	2,502	319,359	9.5	17,314	22.4	11.7	9.9	16.7	24.4	21.9	19.9	25.9	22.7	41.0	37.8	35.0	0.0	0.2	10.5
Akron MSA	2,729	392,579	10.4	23,435	20.7	12.6	9.6	17.7	23.9	21.3	21.3	24.1	21.9	40.3	39.3	33.7	0.0	0.2	13.6
Canton MSA	2,134	292,305	8.1	13,014	19.6	11.5	10.2	18.8	26.5	23.0	21.5	25.4	22.5	40.1	36.5	30.5	0.0	0.1	13.7
Dayton MSA	1,139	216,249	4.3	25,567	21.6	11.4	10.8	16.9	20.2	20.7	20.9	22.7	22.7	40.6	45.5	31.1	0.0	0.2	14.7
Lima MSA	95	11,410	0.4	2,843	19.2	12.6	11.3	19.0	25.3	25.8	22.4	22.1	22.9	39.5	40.0	28.6	0.0	0.0	11.5
Mansfield MSA	235	26,503	0.9	3,367	20.5	9.8	9.4	17.1	23.0	21.5	22.6	33.2	24.2	39.8	34.0	29.4	0.0	0.0	15.4
Springfield MSA	196	23,057	0.7	3,945	20.3	11.7	7.1	17.4	30.6	21.9	21.7	24.0	24.4	40.5	32.7	30.7	0.0	1.0	15.9
Wheeling MSA	124	14,428	0.5	1,357	19.2	12.9	11.2	18.5	28.2	23.2	21.0	27.4	21.0	41.2	31.5	27.2	0.0	0.0	17.4
LS1 Ohio Combined Non-MSA	4,252	483,954	16.1	37,593	18.8	12.8	9.9	18.8	26.7	23.2	22.7	27.3	24.1	39.7	33.0	29.0	0.0	0.1	13.8
Total	26,329	4,177,600	100.0	267,515	21.0	11.2	9.5	17.5	23.0	21.1	20.8	24.6	22.1	40.6	41.0	33.0	0.0	0.2	14.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
Cleveland MSA	12,363	1,103,658	32.4	52,340	8.6	6.3	8.3	16.8	12.8	17.0	32.6	34.7	31.5	41.0	45.4	42.4	1.0	0.8	0.8
Columbus MSA	9,546	866,086	25.0	45,623	9.3	6.6	8.5	17.6	13.6	16.1	29.9	29.0	28.2	42.7	50.3	46.9	0.5	0.5	0.3
Toledo MSA	2,795	196,967	7.3	11,308	11.8	8.2	9.8	9.6	9.0	9.3	41.6	40.5	41.8	36.9	42.4	39.1	0.1	0.0	0.0
Akron MSA	4,773	405,413	12.5	15,625	10.7	8.2	9.2	15.0	14.9	13.7	36.9	38.7	37.5	37.4	38.2	39.6	0.0	0.0	0.0
Canton MSA	2,093	178,703	5.5	7,084	5.1	4.9	5.1	6.9	5.5	5.8	65.7	67.3	63.7	19.9	20.5	23.8	2.4	1.8	1.7
Dayton MSA	1,583	180,106	4.1	14,196	7.2	6.3	6.5	17.4	17.0	17.4	43.0	42.2	42.0	32.3	34.6	34.0	0.0	0.0	0.0
Lima MSA	223	25,346	0.6	1,321	4.7	9.4	4.1	19.4	27.8	16.1	44.0	32.7	44.7	31.9	30.0	35.0	0.0	0.0	0.0
Mansfield MSA	310	22,510	0.8	1,922	9.3	8.4	8.0	15.0	14.5	14.1	48.5	51.6	52.9	27.2	25.5	25.0	0.0	0.0	0.0
Springfield MSA	235	30,487	0.6	1,680	4.8	4.7	4.0	27.6	30.6	25.4	37.8	30.2	37.5	29.8	34.5	33.1	0.0	0.0	0.0
Wheeling MSA	255	15,275	0.7	991	0.0	0.0	0.0	15.3	12.9	14.8	64.6	63.1	65.9	20.1	23.9	19.3	0.0	0.0	0.0
Ohio Combined Non-MSA	4,039	341,151	10.6	21,566	0.8	0.3	0.5	17.4	18.8	14.3	61.4	59.3	62.6	20.4	21.6	22.6	0.0	0.0	0.0
Total	38,215	3,365,702	100.0	173,656	7.7	6.0	7.2	16.2	13.6	15.2	39.9	39.2	38.5	35.7	40.7	38.7	0.5	0.5	0.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland MSA	2,603	240,687	31.1	9.4	6.0	16.0	13.1	27.7	35.4	45.0	44.7	1.9	0.8
Columbus MSA	2,044	162,455	24.4	8.4	7.3	16.3	12.8	31.4	33.4	42.5	46.1	1.4	0.4
Toledo MSA	605	45,875	7.2	7.8	3.5	16.1	15.7	33.0	36.5	33.9	39.2	9.2	5.1
Akron MSA	994	78,513	11.9	18.5	5.6	13.3	11.3	31.6	40.7	33.0	41.3	3.6	1.0
Canton MSA	529	37,912	6.3	3.5	3.8	9.9	7.8	38.7	57.1	47.8	31.4	0.0	0.0
Dayton MSA	390	47,598	4.7	8.2	8.2	18.2	18.7	32.8	26.9	40.3	45.6	0.5	0.5
Lima MSA	24	2,501	0.3	7.5	0.0	26.2	29.2	41.4	54.2	24.9	16.7	0.0	0.0
Mansfield MSA	87	5,516	1.0	4.9	4.6	22.5	32.2	42.7	31.0	28.7	31.0	1.3	1.1
Springfield MSA	48	8,137	0.6	6.2	6.3	21.1	18.8	41.5	31.3	31.2	43.8	0.0	0.0
Wheeling MSA	35	1,943	0.4	0.0	0.0	25.0	14.3	42.1	51.4	32.9	34.3	0.0	0.0
Ohio Combined Non-MSA	1,021	71,697	12.2	1.6	0.7	17.0	14.8	63.0	65.1	18.3	19.2	0.1	0.2
<b>Total</b>	<b>8,380</b>	<b>702,834</b>	<b>100.0</b>	<b>8.4</b>	<b>5.3</b>	<b>16.1</b>	<b>13.4</b>	<b>35.0</b>	<b>40.3</b>	<b>38.6</b>	<b>40.1</b>	<b>1.9</b>	<b>0.9</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Cleveland MSA	12,363	1,103,658	32.4	52,340	83.9	66.7	49.0	6.0	22.6	10.2	10.7
Columbus MSA	9,546	866,086	25.0	45,623	83.9	66.4	45.8	4.9	21.8	11.2	11.8
Toledo MSA	2,795	196,967	7.3	11,308	80.3	68.3	49.2	6.5	20.4	13.2	11.2
Akron MSA	4,773	405,413	12.5	15,625	82.7	68.6	49.5	6.1	21.2	11.2	10.2
Canton MSA	2,093	178,703	5.5	7,084	82.4	67.8	46.9	5.8	22.7	11.8	9.5
Dayton MSA	1,583	180,106	4.1	14,196	81.5	60.8	47.9	5.8	31.1	12.7	8.1
Lima MSA	223	25,346	0.6	1,321	76.4	54.7	46.5	6.8	39.5	16.9	5.8
Mansfield MSA	310	22,510	0.8	1,922	78.5	73.9	46.8	5.8	17.1	15.7	9.0
Springfield MSA	235	30,487	0.6	1,680	79.3	57.4	51.8	6.1	33.2	14.6	9.4
Wheeling MSA	255	15,275	0.7	991	78.2	66.7	43.4	5.5	23.1	16.3	10.2
Ohio Combined Non-MSA	4,039	341,151	10.6	21,566	79.1	67.9	50.4	5.9	23.5	15.0	8.6
<b>Total</b>	<b>38,215</b>	<b>3,365,702</b>	<b>100.0</b>	<b>173,656</b>	<b>82.4</b>	<b>66.9</b>	<b>48.2</b>	<b>5.7</b>	<b>22.6</b>	<b>11.9</b>	<b>10.5</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Cleveland MSA	2,603	240,687	31.1	--	91.2	72.2	--	3.1	27.7	5.7	0.1
Columbus MSA	2,044	162,455	24.4	--	91.3	69.3	--	2.5	30.5	6.2	0.2
Toledo MSA	605	45,875	7.2	--	88.4	75.4	--	3.7	24.6	8.0	0.0
Akron MSA	994	78,513	11.9	--	90.6	74.1	--	3.2	25.8	6.2	0.1
Canton MSA	529	37,912	6.3	--	91.8	76.6	--	2.6	23.3	5.6	0.2
Dayton MSA	390	47,598	4.7	--	88.6	65.1	--	3.4	34.9	8.0	0.0
Lima MSA	24	2,501	0.3	--	83.8	66.7	--	4.6	33.3	11.6	0.0
Mansfield MSA	87	5,516	1.0	--	85.6	72.4	--	3.7	27.6	10.6	0.0
Springfield MSA	48	8,137	0.6	--	86.3	56.3	--	3.9	41.7	9.7	2.1
Wheeling MSA	35	1,943	0.4	--	83.6	88.6	--	4.0	11.4	12.3	0.0
Ohio Combined Non-MSA	1,021	71,697	12.2	--	85.7	73.3	--	3.9	26.7	10.4	0.0
<b>Total</b>	<b>8,380</b>	<b>702,834</b>	<b>100.0</b>	<b>--</b>	<b>90.0</b>	<b>72.0</b>	<b>--</b>	<b>3.1</b>	<b>27.9</b>	<b>6.9</b>	<b>0.1</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020-21**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Cleveland MSA	290	18,087	23.9	326	4.0	3.8	0.9	12.1	5.9	7.4	39.7	38.3	46.6	44.0	52.1	45.1	0.1	0.0	0.0
Columbus MSA	264	21,082	21.8	527	4.9	6.4	1.3	15.0	9.8	8.7	43.4	47.7	58.4	36.7	36.0	31.3	0.1	0.0	0.2
Toledo MSA	104	5,517	8.6	473	3.5	2.9	0.4	5.4	6.7	0.6	51.8	39.4	65.5	39.2	51.0	33.2	0.0	0.0	0.2
Akron MSA	103	6,111	8.5	113	4.6	4.9	1.8	11.0	8.7	5.3	52.0	48.5	67.3	32.4	37.9	25.7	0.0	0.0	0.0
Canton MSA	66	3,024	5.4	149	1.4	0.0	0.0	1.9	3.0	1.3	80.3	83.3	86.6	16.2	13.6	12.1	0.2	0.0	0.0
Dayton MSA	46	4,361	3.8	233	3.1	0.0	0.4	12.4	6.5	8.6	53.1	54.3	53.6	31.4	39.1	37.3	0.0	0.0	0.0
Lima MSA	9	1,371	0.7	131	0.6	0.0	0.0	5.4	0.0	0.0	74.4	100.0	84.0	19.6	0.0	16.0	0.0	0.0	0.0
Mansfield MSA	7	248	0.6	79	1.3	0.0	0.0	7.5	0.0	1.3	61.8	28.6	74.7	29.3	71.4	24.1	0.0	0.0	0.0
LS Springfield MSA	24	2,374	2.0	180	2.7	0.0	0.0	17.7	12.5	0.6	45.8	33.3	61.1	33.8	54.2	38.3	0.0	0.0	0.0
Wheeling MSA	7	446	0.6	39	0.0	0.0	0.0	5.6	0.0	2.6	76.9	57.1	92.3	17.5	42.9	5.1	0.0	0.0	0.0
Ohio Combined Non-MSA	293	12,785	24.2	2,061	0.2	0.3	0.0	6.8	4.4	4.1	63.3	66.6	67.4	29.6	28.7	28.5	0.0	0.0	0.0
<b>Total</b>	<b>1,213</b>	<b>75,406</b>	<b>100.0</b>	<b>4,311</b>	<b>2.7</b>	<b>3.1</b>	<b>0.3</b>	<b>10.0</b>	<b>6.6</b>	<b>4.4</b>	<b>53.4</b>	<b>51.6</b>	<b>65.0</b>	<b>33.9</b>	<b>38.7</b>	<b>30.2</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2022**

Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Cleveland MSA	32	1,488	14.4	6.1	0.0	14.0	6.3	36.5	50.0	42.9	43.8	0.6	0.0
Columbus MSA	44	3,749	19.8	4.8	6.8	15.6	6.8	39.9	56.8	39.2	25.0	0.4	4.5
Toledo MSA	13	848	5.9	3.8	15.4	10.3	7.7	45.6	46.2	36.3	30.8	4.1	0.0
Akron MSA	13	473	5.9	17.7	0.0	11.4	7.7	39.3	53.8	30.9	38.5	0.6	0.0
Canton MSA	14	720	6.3	1.8	0.0	4.8	0.0	53.1	85.7	40.3	14.3	0.0	0.0
Dayton MSA	8	1,028	3.6	4.4	0.0	13.4	12.5	45.2	50.0	36.9	37.5	0.2	0.0
Lima MSA	2	70	0.9	2.2	0.0	6.8	0.0	74.9	0.0	16.0	100.0	0.0	0.0
Mansfield MSA	4	162	1.8	4.6	0.0	8.9	25.0	55.4	50.0	31.2	25.0	0.0	0.0
Springfield MSA	11	1,399	5.0	3.6	0.0	13.9	0.0	30.7	18.2	51.8	81.8	0.0	0.0
Wheeling MSA	3	35	1.4	0.0	0.0	13.4	0.0	61.2	33.3	25.4	66.7	0.0	0.0
Ohio Combined Non-MSA	78	3,867	35.1	0.3	0.0	7.6	6.4	68.2	75.6	23.8	17.9	0.2	0.0
<b>Total</b>	<b>222</b>	<b>13,839</b>	<b>100.0</b>	<b>4.4</b>	<b>2.3</b>	<b>11.4</b>	<b>6.3</b>	<b>49.2</b>	<b>60.4</b>	<b>34.4</b>	<b>30.2</b>	<b>0.6</b>	<b>0.9</b>

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

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cleveland MSA	290	18,087	23.9	326	95.9	84.1	60.4	2.4	10.0	1.7	5.9
Columbus MSA	264	21,082	21.8	527	95.7	73.1	48.8	2.5	18.2	1.8	8.7
Toledo MSA	104	5,517	8.6	473	95.3	79.8	67.4	3.1	11.5	1.6	8.7
Akron MSA	103	6,111	8.5	113	96.2	84.5	79.6	2.3	7.8	1.5	7.8
Canton MSA	66	3,024	5.4	149	97.1	78.8	66.4	1.9	7.6	1.0	13.6
Dayton MSA	46	4,361	3.8	233	96.1	73.9	57.1	2.3	19.6	1.6	6.5
Lima MSA	9	1,371	0.7	131	97.8	88.9	56.5	1.3	11.1	0.9	0.0
Mansfield MSA	7	248	0.6	79	97.8	100.0	51.9	1.3	0.0	0.8	0.0
Springfield MSA	24	2,374	2.0	180	97.5	83.3	37.8	2.2	8.3	0.3	8.3
Wheeling MSA	7	446	0.6	39	96.9	71.4	59.0	1.9	14.3	1.3	14.3
LS1 Ohio Combined Non-MSA	293	12,785	24.2	2,061	97.9	75.8	57.3	1.2	15.7	0.9	8.5
<b>Total</b>	<b>1,213</b>	<b>75,406</b>	<b>100.0</b>	<b>4,311</b>	<b>96.6</b>	<b>78.7</b>	<b>57.6</b>	<b>2.0</b>	<b>13.3</b>	<b>1.4</b>	<b>8.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2022**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Cleveland MSA	32	1,488	14.4	--	97.2	84.4	--	1.6	15.6	1.2	0.0
Columbus MSA	44	3,749	19.8	--	97.1	77.3	--	1.7	22.7	1.3	0.0
Toledo MSA	13	848	5.9	--	97.0	92.3	--	2.0	7.7	1.1	0.0
Akron MSA	13	473	5.9	--	97.7	92.3	--	1.4	7.7	0.9	0.0
Canton MSA	14	720	6.3	--	98.2	64.3	--	1.2	35.7	0.6	0.0
Dayton MSA	8	1,028	3.6	--	97.7	62.5	--	1.3	37.5	1.0	0.0
Lima MSA	2	70	0.9	--	98.0	100.0	--	1.1	0.0	0.9	0.0
Mansfield MSA	4	162	1.8	--	98.4	100.0	--	1.0	0.0	0.6	0.0
Springfield MSA	11	1,399	5.0	--	98.4	72.7	--	1.4	27.3	0.2	0.0
Wheeling MSA	3	35	1.4	--	96.9	100.0	--	2.2	0.0	0.9	0.0
LS1 Ohio Combined Non-MSA	78	3,867	35.1	--	98.4	82.1	--	0.9	17.9	0.7	0.0
<b>Total</b>	<b>222</b>	<b>13,839</b>	<b>100.0</b>	<b>--</b>	<b>97.6</b>	<b>81.1</b>	<b>--</b>	<b>1.4</b>	<b>18.9</b>	<b>1.0</b>	<b>0.0</b>

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



# Pennsylvania

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Pittsburgh MSA	4,298	822,298	83.6	104,790	2.8	1.5	1.4	14.3	11.8	10.6	51.9	49.1	47.2	31.1	37.6	40.8	0.0	0.0	0.0
Erie MSA	196	28,370	3.8	8,647	4.5	3.1	1.8	8.8	11.7	7.5	50.6	43.9	47.8	36.2	41.3	42.8	0.0	0.0	0.0
Pennsylvania Combined Non-MSA	648	71,482	12.6	3,096	3.1	1.1	0.8	7.7	4.5	4.2	75.8	73.5	76.0	13.4	21.0	19.0	0.0	0.0	0.0
Total	5,142	922,150	100.0	116,533	2.9	1.5	1.4	13.5	10.9	10.2	52.7	52.0	48.0	30.9	35.6	40.4	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Pittsburgh MSA	1,391	242,105	82.3	68,451	2.6	1.9	2.1	16.4	17.5	13.9	47.1	44.5	44.0	33.7	35.9	40.0	0.2	0.2	0.1	
Erie MSA	68	9,865	4.0	6,227	3.6	4.4	2.5	14.9	5.9	13.8	45.5	42.6	45.1	35.8	47.1	38.3	0.2	0.0	0.3	
Pennsylvania Combined Non-MSA	231	23,486	13.7	2,333	3.8	3.0	2.1	10.3	8.7	10.8	62.6	61.9	60.7	23.3	26.4	26.4	0.0	0.0	0.0	
Total	1,690	275,456	100.0	77,011	2.8	2.1	2.1	16.0	15.8	13.8	47.5	46.8	44.6	33.5	35.1	39.4	0.2	0.2	0.1	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsburgh MSA	4,298	822,298	83.6	104,790	20.3	11.4	8.4	17.1	20.3	17.6	20.5	23.0	21.1	42.1	44.9	37.8	0.0	0.3	15.1
Erie MSA	196	28,370	3.8	8,647	21.1	8.7	6.2	17.6	25.0	17.5	20.8	21.9	22.7	40.5	44.4	39.8	0.0	0.0	13.8
Pennsylvania Combined Non-MSA	648	71,482	12.6	3,096	20.8	9.1	6.7	16.9	22.2	20.4	21.5	24.1	21.2	40.9	44.6	37.3	0.0	0.0	14.5
Total	5,142	922,150	100.0	116,533	20.4	11.0	8.2	17.1	20.7	17.6	20.5	23.1	21.2	41.9	44.9	37.9	0.0	0.3	15.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsburgh MSA	1,391	242,105	82.3	68,451	19.3	15.5	11.8	17.8	24.7	20.3	21.1	22.9	21.0	41.8	36.7	33.3	0.0	0.2	13.6
Erie MSA	68	9,865	4.0	6,227	20.5	7.4	9.2	17.7	22.1	20.2	21.5	30.9	23.3	40.3	39.7	36.1	0.0	0.0	11.2
Pennsylvania Combined Non-MSA	231	23,486	13.7	2,333	20.6	11.7	10.2	18.0	25.5	21.8	20.6	30.7	24.8	40.8	32.0	30.5	0.0	0.0	12.7
<b>Total</b>	<b>1,690</b>	<b>275,456</b>	<b>100.0</b>	<b>77,011</b>	<b>19.5</b>	<b>14.6</b>	<b>11.6</b>	<b>17.8</b>	<b>24.7</b>	<b>20.3</b>	<b>21.1</b>	<b>24.3</b>	<b>21.3</b>	<b>41.6</b>	<b>36.2</b>	<b>33.4</b>	<b>0.0</b>	<b>0.2</b>	<b>13.3</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
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	
Pittsburgh MSA	3,391	325,781	88.4	53,471	5.0	3.8	3.8	14.2	14.5	12.8	41.6	46.7	40.2	38.3	34.4	35.1	0.9	0.6	8.2	
Erie MSA	119	10,280	3.1	4,567	12.6	2.5	10.2	12.0	10.1	10.8	44.2	54.6	46.8	31.2	32.8	32.1	0.0	0.0	0.0	
Pennsylvania Combined Non-MSA	324	23,682	8.5	1,586	10.6	9.3	11.3	6.1	5.6	5.4	62.7	66.7	63.1	20.6	18.5	20.2	0.0	0.0	0.0	
Total	3,834	359,743	100.0	59,624	5.8	4.2	4.5	13.8	13.6	12.4	42.4	48.6	41.3	37.3	33.0	34.4	0.8	0.5	7.4	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh MSA	842	77,669	87.3	5.5	4.2	14.5	15.6	38.7	39.3	39.6	39.3	1.8	1.7
Erie MSA	54	7,140	5.6	10.5	0.0	17.8	5.6	37.6	64.8	32.8	29.6	1.4	0.0
Pennsylvania Combined Non-MSA	68	3,954	7.1	12.0	4.4	13.6	11.8	47.6	67.6	26.8	16.2	0.0	0.0
<b>Total</b>	<b>964</b>	<b>88,763</b>	<b>100.0</b>	<b>6.1</b>	<b>3.9</b>	<b>14.7</b>	<b>14.7</b>	<b>38.9</b>	<b>42.7</b>	<b>38.7</b>	<b>37.1</b>	<b>1.7</b>	<b>1.5</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</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
Pittsburgh MSA	3,391	325,781	88.4	53,471	86.2	66.1	48.1	4.4	25.0	9.4	8.9
Erie MSA	119	10,280	3.1	4,567	83.5	74.0	49.9	5.7	19.3	10.8	6.7
Pennsylvania Combined Non-MSA	324	23,682	8.5	1,586	84.4	74.4	55.0	5.3	21.0	10.3	4.6
<b>Total</b>	<b>3,834</b>	<b>359,743</b>	<b>100.0</b>	<b>59,624</b>	<b>86.0</b>	<b>67.0</b>	<b>48.4</b>	<b>4.5</b>	<b>24.5</b>	<b>9.5</b>	<b>8.5</b>
Source: 2021 D&B Data; 01/01/2020 - 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</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
Pittsburgh MSA	842	77,669	87.3	--	87.8	70.2	--	3.7	29.7	8.4	0.1
Erie MSA	54	7,140	5.6	--	85.5	79.6	--	4.9	18.5	9.6	1.9
Pennsylvania Combined Non-MSA	68	3,954	7.1	--	86.4	75.0	--	4.5	25.0	9.1	0.0
<b>Total</b>	<b>964</b>	<b>88,763</b>	<b>100.0</b>	<b>--</b>	<b>87.6</b>	<b>71.1</b>	<b>--</b>	<b>3.9</b>	<b>28.7</b>	<b>8.6</b>	<b>0.2</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Pittsburgh MSA	63	4,582	88.7	216	2.3	0.0	1.9	10.6	17.5	8.3	57.3	42.9	68.1	29.7	39.7	21.8	0.1	0.0	0.0
Erie MSA	0	0	0.0	37	2.9	0.0	0.0	7.6	0.0	18.9	46.9	0.0	45.9	42.6	0.0	35.1	0.0	0.0	0.0
Pennsylvania Combined Non-MSA	8	163	11.3	32	1.4	0.0	0.0	2.5	0.0	0.0	86.0	50.0	93.8	10.1	50.0	6.3	0.0	0.0	0.0
<b>Total</b>	<b>71</b>	<b>4,745</b>	<b>100.0</b>	<b>285</b>	<b>2.3</b>	<b>0.0</b>	<b>1.4</b>	<b>9.9</b>	<b>15.5</b>	<b>8.8</b>	<b>57.7</b>	<b>43.7</b>	<b>68.1</b>	<b>30.0</b>	<b>40.8</b>	<b>21.8</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Pittsburgh MSA	12	886	80.0	2.3	0.0	13.7	0.0	52.3	41.7	31.2	58.3	0.5	0.0
Erie MSA	1	21	6.7	3.3	0.0	10.1	0.0	51.9	0.0	33.9	100.0	0.8	0.0
Pennsylvania Combined Non-MSA	2	36	13.3	2.5	0.0	4.4	0.0	66.9	100.0	26.2	0.0	0.0	0.0
Total	15	943	100.0	2.4	0.0	12.9	0.0	53.0	46.7	31.2	53.3	0.5	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													



Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pittsburgh MSA	63	4,582	88.7	216	97.2	79.4	54.6	1.7	15.9	1.2	4.8
Erie MSA	--	--	--	37	95.8	--	62.2	2.7	--	1.4	--
Pennsylvania Combined Non-MSA	8	163	11.3	32	99.6	100.0	62.5	0.0	0.0	0.4	0.0
<b>Total</b>	<b>71</b>	<b>4,745</b>	<b>100.0</b>	<b>285</b>	<b>97.2</b>	<b>81.7</b>	<b>56.5</b>	<b>1.7</b>	<b>14.1</b>	<b>1.2</b>	<b>4.2</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pittsburgh MSA	12	886	80.0	--	97.4	91.7	--	1.4	8.3	1.2	0.0
Erie MSA	1	21	6.7	--	96.4	100.0	--	2.4	0.0	1.1	0.0
Pennsylvania Combined Non-MSA	2	36	13.3	--	99.7	100.0	--	0.0	0.0	0.3	0.0
<b>Total</b>	<b>15</b>	<b>943</b>	<b>100.0</b>	<b>--</b>	<b>97.4</b>	<b>93.3</b>	<b>--</b>	<b>1.4</b>	<b>6.7</b>	<b>1.1</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

## South Dakota

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Sioux Falls MSA	5	1,164	100.0	12,389	0.0	0.0	0.0	28.3	20.0	22.2	50.6	60.0	51.8	21.1	20.0	26.0	0.0	0.0	0.0
Total	5	1,164	100.0	12,389	0.0	0.0	0.0	28.3	20.0	22.2	50.6	60.0	51.8	21.1	20.0	26.0	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Sioux Falls MSA	5	3,216	100.0	7,731	1.5	0.0	1.4	23.9	0.0	23.0	51.0	20.0	50.5	23.6	80.0	25.1	0.0	0.0	0.0
Total	5	3,216	100.0	7,731	1.5	0.0	1.4	23.9	0.0	23.0	51.0	20.0	50.5	23.6	80.0	25.1	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Sioux Falls MSA	5	1,164	100.0	12,389	21.0	0.0	8.0	19.3	100.0	21.8	24.2	0.0	21.0	35.5	0.0	30.4	0.0	0.0	18.8
<b>Total</b>	<b>5</b>	<b>1,164</b>	<b>100.0</b>	<b>12,389</b>	<b>21.0</b>	<b>0.0</b>	<b>8.0</b>	<b>19.3</b>	<b>100.0</b>	<b>21.8</b>	<b>24.2</b>	<b>0.0</b>	<b>21.0</b>	<b>35.5</b>	<b>0.0</b>	<b>30.4</b>	<b>0.0</b>	<b>0.0</b>	<b>18.8</b>
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Sioux Falls MSA	5	3,216	100.0	7,731	20.4	0.0	8.1	18.7	0.0	21.6	24.6	0.0	23.4	36.3	100.0	31.7	0.0	0.0	15.2
<b>Total</b>	<b>5</b>	<b>3,216</b>	<b>100.0</b>	<b>7,731</b>	<b>20.4</b>	<b>0.0</b>	<b>8.1</b>	<b>18.7</b>	<b>0.0</b>	<b>21.6</b>	<b>24.6</b>	<b>0.0</b>	<b>23.4</b>	<b>36.3</b>	<b>100.0</b>	<b>31.7</b>	<b>0.0</b>	<b>0.0</b>	<b>15.2</b>
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2020-21
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	
Sioux Falls MSA	31	5,089	100.0	5,669	0.0	0.0	0.0	49.5	58.1	44.5	34.3	29.0	35.8	16.2	12.9	19.7	0.0	0.0	0.0	
Total	31	5,089	100.0	5,669	0.0	0.0	0.0	49.5	58.1	44.5	34.3	29.0	35.8	16.2	12.9	19.7	0.0	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Sioux Falls MSA	17	2,142	100.0	13.3	0.0	31.9	64.7	36.1	29.4	15.1	5.9	3.7	0.0
Total	17	2,142	100.0	13.3	0.0	31.9	64.7	36.1	29.4	15.1	5.9	3.7	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Sioux Falls MSA	31	5,089	100.0	5,669	86.0	51.6	51.9	4.5	45.2	9.5	3.2
<b>Total</b>	<b>31</b>	<b>5,089</b>	<b>100.0</b>	<b>5,669</b>	<b>86.0</b>	<b>51.6</b>	<b>51.9</b>	<b>4.5</b>	<b>45.2</b>	<b>9.5</b>	<b>3.2</b>
Source: 2021 D&B Data; 01/01/2020 - 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</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Sioux Falls MSA	17	2,142	100.0	--	88.5	47.1	--	3.5	52.9	7.9	0.0
<b>Total</b>	<b>17</b>	<b>2,142</b>	<b>100.0</b>	<b>--</b>	<b>88.5</b>	<b>47.1</b>	<b>--</b>	<b>3.5</b>	<b>52.9</b>	<b>7.9</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Sioux Falls MSA	2	62	100.0	791	0.0	0.0	0.0	16.7	0.0	1.4	59.4	100.0	79.5	23.9	0.0	19.1	0.0	0.0	0.0
<b>Total</b>	<b>2</b>	<b>62</b>	<b>100.0</b>	<b>791</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>16.7</b>	<b>0.0</b>	<b>1.4</b>	<b>59.4</b>	<b>100.0</b>	<b>79.5</b>	<b>23.9</b>	<b>0.0</b>	<b>19.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Sioux Falls MSA	1	59	100.0	4.3	0.0	13.9	0.0	62.1	100.0	19.2	0.0	0.5	0.0
Total	1	59	100.0	4.3	0.0	13.9	0.0	62.1	100.0	19.2	0.0	0.5	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Sioux Falls MSA	2	62	100.0	791	98.1	100.0	79.5	1.3	0.0	0.6	0.0
<b>Total</b>	<b>2</b>	<b>62</b>	<b>100.0</b>	<b>791</b>	<b>98.1</b>	<b>100.0</b>	<b>79.5</b>	<b>1.3</b>	<b>0.0</b>	<b>0.6</b>	<b>0.0</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Sioux Falls MSA	1	59	100.0	--	98.2	100.0	--	1.2	0.0	0.5	0.0
<b>Total</b>	<b>1</b>	<b>59</b>	<b>100.0</b>	<b>--</b>	<b>98.2</b>	<b>100.0</b>	<b>--</b>	<b>1.2</b>	<b>0.0</b>	<b>0.5</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

## West Virginia

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
West Virginia Combined Non-MSA	966	133,162	34.6	4,573	0.2	0.1	0.2	5.8	7.8	5.1	58.6	48.7	43.3	35.4	43.5	51.4	0.0	0.0	0.0
Charleston MSA	415	66,828	14.9	4,904	1.2	1.2	0.7	11.3	9.4	10.6	52.9	41.4	42.1	34.7	48.0	46.6	0.0	0.0	0.0
Huntington MSA	468	74,865	16.8	5,727	3.2	1.7	2.0	13.2	6.4	6.3	49.4	50.2	47.3	34.1	41.7	44.3	0.0	0.0	0.2
Morgantown MSA	725	177,786	25.9	4,267	0.0	0.1	0.2	15.3	12.3	12.5	43.2	42.8	35.6	41.4	44.8	51.7	0.0	0.0	0.0
Parkersburg MSA	220	32,920	7.9	2,548	0.0	0.0	0.0	8.5	2.7	5.5	67.4	61.8	65.7	24.2	35.5	28.7	0.0	0.0	0.0
Total	2,794	485,561	100.0	22,019	1.2	0.5	0.8	10.5	8.6	8.1	54.2	47.4	45.2	34.1	43.6	45.9	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
West Virginia Combined Non-MSA	394	54,146	37.7	3,164	0.2	0.0	0.3	7.9	8.4	9.3	46.6	45.2	39.3	45.3	46.4	51.0	0.0	0.0	0.0	
Charleston MSA	163	23,636	15.6	3,513	0.3	0.0	0.3	10.6	4.9	8.5	59.0	57.1	55.8	27.6	36.8	33.6	2.5	1.2	1.9	
Huntington MSA	177	23,510	16.9	3,979	2.1	0.6	2.6	16.0	10.7	12.5	45.7	44.6	43.4	36.2	44.1	41.5	0.0	0.0	0.0	
Morgantown MSA	222	53,556	21.2	2,500	0.2	0.0	0.5	9.5	5.9	6.2	52.4	54.5	51.1	37.4	39.2	41.2	0.5	0.5	1.0	
Parkersburg MSA	89	13,312	8.5	1,596	0.0	0.0	0.0	18.7	21.3	20.6	44.1	32.6	44.6	37.2	46.1	34.8	0.0	0.0	0.0	
Total	1,045	168,160	100.0	14,752	0.7	0.1	0.9	12.2	8.8	10.7	49.9	47.8	46.9	36.5	43.0	40.9	0.7	0.3	0.6	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
West Virginia Combined Non-MSA	966	133,162	34.6	4,573	18.7	4.0	4.1	16.0	15.8	11.7	19.5	26.3	20.8	45.8	52.8	48.7	0.0	1.0	14.8
Charleston MSA	415	66,828	14.9	4,904	20.7	7.7	6.1	17.1	20.5	17.3	19.8	24.3	21.6	42.4	47.0	40.9	0.0	0.5	14.2
Huntington MSA	468	74,865	16.8	5,727	21.8	6.4	5.3	16.5	13.2	14.1	19.7	21.6	20.3	42.1	58.1	45.8	0.0	0.6	14.6
Morgantown MSA	725	177,786	25.9	4,267	20.9	6.8	5.3	14.4	13.1	14.4	20.4	18.1	18.5	44.2	61.7	47.9	0.0	0.4	13.9
Parkersburg MSA	220	32,920	7.9	2,548	20.5	7.7	8.0	17.1	19.1	17.8	20.3	22.7	21.1	42.1	50.0	39.2	0.0	0.5	13.9
Total	2,794	485,561	100.0	22,019	20.5	6.0	5.5	16.4	15.6	14.8	19.8	22.8	20.4	43.3	54.9	44.9	0.0	0.7	14.3
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
West Virginia Combined Non-MSA	394	54,146	37.7	3,164	16.8	5.3	3.9	15.2	21.6	15.2	18.8	23.4	21.5	49.2	49.2	47.4	0.0	0.5	12.0
Charleston MSA	163	23,636	15.6	3,513	22.5	12.9	7.1	16.0	25.2	21.3	19.6	21.5	22.6	42.0	40.5	35.2	0.0	0.0	13.7
Huntington MSA	177	23,510	16.9	3,979	21.4	9.0	7.2	15.6	23.7	18.8	20.0	20.9	21.9	43.0	46.3	40.3	0.0	0.0	11.8
Morgantown MSA	222	53,556	21.2	2,500	20.7	12.2	8.7	16.8	18.0	17.9	16.3	16.2	21.4	46.2	53.6	39.7	0.0	0.0	12.2
Parkersburg MSA	89	13,312	8.5	1,596	20.9	14.6	10.8	18.2	18.0	21.7	20.2	21.3	23.9	40.7	46.1	32.2	0.0	0.0	11.5
Total	1,045	168,160	100.0	14,752	20.4	9.4	7.1	16.1	21.4	18.8	19.2	21.0	22.1	44.4	48.0	39.6	0.0	0.2	12.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
West Virginia Combined Non-MSA	501	41,493	29.3	2,487	2.1	1.2	1.6	6.9	7.2	8.0	51.8	49.9	49.2	39.2	41.7	41.2	0.0	0.0	0.0
Charleston MSA	433	43,829	25.3	3,305	4.1	7.9	4.2	10.7	13.2	9.6	53.6	53.8	52.3	31.6	25.2	33.8	0.0	0.0	0.0
Huntington MSA	414	37,710	24.2	2,680	12.6	14.5	12.7	9.6	8.7	7.7	40.4	37.7	42.5	36.7	39.1	36.6	0.8	0.0	0.5
Morgantown MSA	252	18,123	14.7	2,104	0.3	0.0	0.2	20.4	20.2	19.1	37.2	38.9	37.5	42.1	40.9	43.2	0.0	0.0	0.0
Parkersburg MSA	112	10,799	6.5	1,377	0.0	0.0	0.0	10.8	5.4	8.8	71.0	75.9	65.7	18.2	18.8	25.6	0.0	0.0	0.0
Total	1,712	151,954	100.0	11,953	4.5	5.8	4.4	11.2	10.9	10.4	49.2	48.0	48.4	34.8	35.3	36.7	0.2	0.0	0.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
West Virginia Combined Non-MSA	108	13,213	31.0	1.9	0.9	12.5	13.0	44.3	55.6	41.3	30.6	0.0	0.0
Charleston MSA	93	11,619	26.7	1.0	1.1	11.8	12.9	47.9	47.3	37.9	33.3	1.5	5.4
Huntington MSA	83	9,095	23.9	12.2	9.6	14.9	19.3	37.2	37.3	35.7	33.7	0.0	0.0
Morgantown MSA	43	2,608	12.4	0.7	0.0	12.3	11.6	46.8	44.2	35.2	41.9	5.0	2.3
Parkersburg MSA	21	2,559	6.0	0.0	0.0	27.8	61.9	44.3	28.6	27.9	9.5	0.0	0.0
<b>Total</b>	<b>348</b>	<b>39,094</b>	<b>100.0</b>	<b>3.6</b>	<b>2.9</b>	<b>14.4</b>	<b>17.2</b>	<b>44.1</b>	<b>46.0</b>	<b>36.7</b>	<b>32.2</b>	<b>1.2</b>	<b>1.7</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank 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>2020-21</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
West Virginia Combined Non-MSA	501	41,493	29.3	2,487	81.9	66.9	45.9	4.8	23.4	13.3	9.8
Charleston MSA	433	43,829	25.3	3,305	79.4	62.8	47.1	5.4	29.6	15.2	7.6
Huntington MSA	414	37,710	24.2	2,680	81.6	66.7	44.4	5.0	26.1	13.4	7.2
Morgantown MSA	252	18,123	14.7	2,104	85.2	67.9	44.8	3.6	20.6	11.2	11.5
Parkersburg MSA	112	10,799	6.5	1,377	81.2	66.1	36.4	4.5	31.3	14.3	2.7
<b>Total</b>	<b>1,712</b>	<b>151,954</b>	<b>100.0</b>	<b>11,953</b>	<b>81.6</b>	<b>65.9</b>	<b>44.6</b>	<b>4.8</b>	<b>25.7</b>	<b>13.6</b>	<b>8.4</b>
<i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
West Virginia Combined Non-MSA	108	13,213	31.0	--	83.4	64.8	--	4.3	34.3	12.3	0.9
Charleston MSA	93	11,619	26.7	--	81.2	55.9	--	4.6	44.1	14.2	0.0
Huntington MSA	83	9,095	23.9	--	83.1	55.4	--	4.5	44.6	12.4	0.0
Morgantown MSA	43	2,608	12.4	--	86.8	76.7	--	3.1	23.3	10.1	0.0
Parkersburg MSA	21	2,559	6.0	--	82.7	42.9	--	4.1	57.1	13.2	0.0
<b>Total</b>	<b>348</b>	<b>39,094</b>	<b>100.0</b>	<b>--</b>	<b>83.2</b>	<b>60.3</b>	<b>--</b>	<b>4.2</b>	<b>39.4</b>	<b>12.6</b>	<b>0.3</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
West Virginia Combined Non-MSA	12	1,396	31.6	45	0.2	0.0	0.0	3.3	8.3	0.0	62.4	58.3	55.6	34.1	33.3	44.4	0.0	0.0	0.0
Charleston MSA	13	1,510	34.2	15	2.2	0.0	6.7	11.1	0.0	6.7	53.0	69.2	46.7	33.7	30.8	40.0	0.0	0.0	0.0
Huntington MSA	5	429	13.2	36	5.1	20.0	0.0	8.3	20.0	19.4	47.2	20.0	52.8	39.5	40.0	27.8	0.0	0.0	0.0
Morgantown MSA	7	341	18.4	10	0.0	0.0	0.0	7.1	14.3	10.0	48.4	28.6	90.0	44.6	57.1	0.0	0.0	0.0	0.0
Parkersburg MSA	1	42	2.6	7	0.0	0.0	0.0	2.1	0.0	0.0	82.6	100.0	85.7	15.3	0.0	14.3	0.0	0.0	0.0
Total	38	3,718	100.0	113	1.8	2.6	0.9	6.5	7.9	8.0	56.8	52.6	58.4	34.9	36.8	32.7	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			



Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography <span style="float: right;">2022</span>													
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
West Virginia Combined Non-MSA	2	10	25.0	0.2	0.0	6.5	0.0	46.3	100.0	47.1	0.0	0.0	0.0
Charleston MSA	1	75	12.5	0.6	0.0	7.7	0.0	58.7	100.0	29.2	0.0	3.8	0.0
Huntington MSA	4	295	50.0	5.5	0.0	8.4	0.0	43.6	50.0	42.4	50.0	0.0	0.0
Morgantown MSA	1	11	12.5	0.5	0.0	2.8	0.0	58.3	100.0	37.5	0.0	0.9	0.0
Parkersburg MSA	0	0	0.0	0.0	0.0	13.0	0.0	43.2	0.0	43.8	0.0	0.0	0.0
<b>Total</b>	<b>8</b>	<b>391</b>	<b>100.0</b>	<b>1.7</b>	<b>0.0</b>	<b>7.4</b>	<b>0.0</b>	<b>49.3</b>	<b>75.0</b>	<b>40.8</b>	<b>25.0</b>	<b>0.9</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
West Virginia Combined Non-MSA	10	1,260	31.3	43	98.0	40.0	53.5	0.6	30.0	1.4	30.0
Charleston MSA	10	994	31.3	14	94.7	60.0	42.9	2.9	30.0	2.4	10.0
Huntington MSA	5	429	15.6	23	96.1	60.0	30.4	1.3	20.0	2.6	20.0
Morgantown MSA	6	291	18.8	11	98.1	100.0	54.5	0.6	0.0	1.3	0.0
Parkersburg MSA	1	42	3.1	10	98.2	100.0	30.0	0.9	0.0	0.9	0.0
<b>Total</b>	<b>32</b>	<b>3,016</b>	<b>100.0</b>	<b>101</b>	<b>96.9</b>	<b>62.5</b>	<b>44.6</b>	<b>1.2</b>	<b>21.9</b>	<b>1.9</b>	<b>15.6</b>
Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
West Virginia Combined Non-MSA	2	10	25.0	--	98.8	100.0	--	0.2	0.0	1.0	0.0
Charleston MSA	1	75	12.5	--	96.8	100.0	--	1.6	0.0	1.6	0.0
Huntington MSA	4	295	50.0	--	97.4	75.0	--	0.5	25.0	2.2	0.0
Morgantown MSA	1	11	12.5	--	99.1	100.0	--	0.5	0.0	0.5	0.0
Parkersburg MSA	--	--	--	--	98.8	--	--	0.6	--	0.6	--
<b>Total</b>	<b>8</b>	<b>391</b>	<b>100.0</b>	<b>--</b>	<b>98.1</b>	<b>87.5</b>	<b>--</b>	<b>0.6</b>	<b>12.5</b>	<b>1.3</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

## Wisconsin

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Milwaukee MSA	214	69,287	89.2	75,515	8.9	6.5	4.6	14.5	12.2	12.4	32.0	28.0	31.4	44.5	53.3	51.7	0.0	0.0	0.0
Racine MSA	26	4,616	10.8	11,903	2.7	0.0	1.4	16.1	15.4	14.0	57.4	50.0	59.4	23.6	34.6	24.9	0.2	0.0	0.3
Total	240	73,904	100.0	87,418	8.0	5.8	4.1	14.8	12.5	12.6	35.7	30.4	35.2	41.5	51.3	48.0	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Milwaukee MSA	289	79,829	84.8	41,229	6.7	10.0	6.8	14.7	12.8	15.1	35.8	31.1	34.9	42.6	46.0	43.0	0.2	0.0	0.2
Racine MSA	52	6,317	15.2	6,935	4.2	5.8	4.0	15.0	28.8	16.9	38.1	34.6	38.3	42.7	30.8	40.8	0.0	0.0	0.0
Total	341	86,146	100.0	48,164	6.3	9.4	6.4	14.7	15.2	15.4	36.2	31.7	35.4	42.6	43.7	42.7	0.2	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Milwaukee MSA	214	69,288	89.2	75,515	25.7	9.3	6.8	16.3	22.0	18.3	19.0	18.2	22.3	39.0	49.5	38.9	0.0	0.9	13.7
Racine MSA	26	4,616	10.8	11,903	20.0	7.7	6.7	17.8	30.8	19.2	21.9	34.6	23.6	40.3	26.9	36.9	0.0	0.0	13.6
Total	240	73,904	100.0	87,418	24.9	9.2	6.8	16.5	22.9	18.4	19.4	20.0	22.5	39.2	47.1	38.6	0.0	0.8	13.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Milwaukee MSA	289	79,829	84.8	41,229	24.3	12.8	10.1	17.0	19.0	20.8	19.9	19.0	22.2	38.7	48.8	35.0	0.0	0.3	11.9
Racine MSA	52	6,317	15.2	6,935	21.0	28.8	9.0	18.3	38.5	24.2	20.1	17.3	22.9	40.5	15.4	32.2	0.0	0.0	11.8
Total	341	86,146	100.0	48,164	23.9	15.2	9.9	17.2	22.0	21.3	20.0	18.8	22.3	39.0	43.7	34.6	0.0	0.3	11.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020-21**

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
Milwaukee MSA	188	33,080	91.7	30,813	13.7	6.4	12.5	14.2	18.6	12.9	31.3	30.9	30.8	40.8	44.1	43.8	0.1	0.0	0.0
Racine MSA	17	836	8.3	3,593	5.3	11.8	5.5	18.9	17.6	17.8	53.6	52.9	52.4	19.3	17.6	21.3	2.9	0.0	3.1
<b>Total</b>	<b>205</b>	<b>33,916</b>	<b>100.0</b>	<b>34,406</b>	<b>12.8</b>	<b>6.8</b>	<b>11.8</b>	<b>14.7</b>	<b>18.5</b>	<b>13.4</b>	<b>33.7</b>	<b>32.7</b>	<b>33.1</b>	<b>38.4</b>	<b>42.0</b>	<b>41.4</b>	<b>0.4</b>	<b>0.0</b>	<b>0.3</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022**

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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Milwaukee MSA	130	22,043	86.1	12.4	6.9	17.9	16.9	31.5	33.1	37.4	43.1	0.8	0.0
Racine MSA	21	1,253	13.9	10.8	9.5	15.8	9.5	36.2	28.6	37.0	52.4	0.1	0.0
<b>Total</b>	<b>151</b>	<b>23,296</b>	<b>100.0</b>	<b>12.2</b>	<b>7.3</b>	<b>17.7</b>	<b>15.9</b>	<b>32.0</b>	<b>32.5</b>	<b>37.3</b>	<b>44.4</b>	<b>0.8</b>	<b>0.0</b>

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
Milwaukee MSA	188	33,080	91.7	30,813	80.6	51.1	51.1	7.9	44.1	11.6	4.8
Racine MSA	17	836	8.3	3,593	82.6	58.8	48.5	6.3	35.3	11.1	5.9
<b>Total</b>	<b>205</b>	<b>33,916</b>	<b>100.0</b>	<b>34,406</b>	<b>80.8</b>	<b>51.7</b>	<b>50.9</b>	<b>7.7</b>	<b>43.4</b>	<b>11.5</b>	<b>4.9</b>
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Milwaukee MSA	130	22,043	86.1	--	85.9	57.7	--	5.5	42.3	8.6	0.0
Racine MSA	21	1,253	13.9	--	86.5	71.4	--	4.7	28.6	8.8	0.0
<b>Total</b>	<b>151</b>	<b>23,296</b>	<b>100.0</b>	<b>--</b>	<b>85.9</b>	<b>59.6</b>	<b>--</b>	<b>5.4</b>	<b>40.4</b>	<b>8.6</b>	<b>0.0</b>
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Milwaukee MSA	3	345	100.0	107	9.2	0.0	8.4	10.7	0.0	9.3	28.5	33.3	11.2	51.6	66.7	71.0	0.0	0.0	0.0
Racine MSA	0	0	0.0	90	1.9	0.0	0.0	7.0	0.0	1.1	54.4	0.0	26.7	36.7	0.0	72.2	0.0	0.0	0.0
Total	3	345	100.0	197	7.6	0.0	4.6	9.9	0.0	5.6	34.3	33.3	18.3	48.3	66.7	71.6	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography													2022
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Milwaukee MSA	2	59	100.0	9.9	0.0	12.9	0.0	31.4	0.0	45.3	100.0	0.4	0.0
Racine MSA	0	0	0.0	3.2	0.0	6.3	0.0	31.0	0.0	59.6	0.0	0.0	0.0
Total	2	59	100.0	8.5	0.0	11.6	0.0	31.3	0.0	48.3	100.0	0.3	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%													

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2020-21**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Milwaukee MSA	3	345	100.0	107	93.0	100.0	67.3	4.7	0.0	2.3	0.0
Racine MSA	--	--	--	90	94.9	--	67.8	3.5	--	1.6	--
<b>Total</b>	<b>3</b>	<b>345</b>	<b>100.0</b>	<b>197</b>	<b>93.4</b>	<b>100.0</b>	<b>67.5</b>	<b>4.5</b>	<b>0.0</b>	<b>2.1</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2022**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Milwaukee MSA	2	59	100.0	--	94.9	100.0	--	3.4	0.0	1.7	0.0
Racine MSA	--	--	--	--	96.3	--	--	2.8	--	1.0	--
<b>Total</b>	<b>2</b>	<b>59</b>	<b>100.0</b>	<b>--</b>	<b>95.2</b>	<b>100.0</b>	<b>--</b>	<b>3.3</b>	<b>0.0</b>	<b>1.6</b>	<b>0.0</b>

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