



**PUBLIC DISCLOSURE**

June 10, 2024

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

FCN Bank, National Association  
Charter Number 5629

501 Main Street  
Brookville, IN 47012

Office of the Comptroller of the Currency

West Lake Center  
4555 Lake Forest Drive, Suite 520  
Blue Ash, OH 45242-3760

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

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## **Overall CRA Rating**

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

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

**The community development test is rated: Outstanding.**

The major factors that support this rating include:

- An outstanding Lending Test rating, which is based on performance in the two rating areas, the Cincinnati OH-KY-IN multistate metropolitan statistical area (MMSA) and the state of Indiana. The overall conclusions are weighted, based on loans and deposits, with more weight given to the excellent performance in the Cincinnati OH-KY-IN MMSA.
- An outstanding Community Development (CD) Test rating, which is also based on performance of the two rating areas with more weight given to the excellent performance in the Cincinnati OH-KY-IN MMSA.
- A substantial majority of loans were originated within the bank's assessment areas (AAs) and the loan-to-deposit (LTD) is reasonable.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. As calculated on a bank-wide basis, FCN's quarterly LTD ratio averaged 60.2 percent over the 12-quarter period ended December 31, 2023. During this timeframe, the LTD ratio ranged from a low of 52.1 percent as of March 31, 2022, to a high of 70.2 percent as of September 30, 2023. FCN's ratio is below the average LTD ratio of 79.8 percent for the ten other banks with total assets of less than \$1.1 billion and headquartered in the AAs. The average LTD of these ten banks ranged from 51.2 percent to 141.9 percent. The OCC also considered that FCN sold 514 home mortgage loans totaling \$81.5 million during the evaluation period.

### **Lending in Assessment Area**

A substantial majority of FCN's loans are inside its AAs. By number, the bank originated and purchased 90.5 percent of its total loans inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	879	90.7	90	9.3	969	173,905	84.2	32,643	15.8	206,548
Small Business	52	86.7	8	13.3	60	11,972	76.8	3,608	23.2	15,580
Total	931	90.5	98	9.5	1,029	185,877	83.7	36,251	16.3	222,128

*Source: 01/01/21-12/31/23 Bank Data.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

FCN is a federally chartered national bank that is wholly owned by FCN Banc Corp, a single bank holding company. Both entities are headquartered in Brookville, Indiana, which is located approximately 75 miles southeast of Indianapolis, Indiana and 40 miles northwest of Cincinnati, Ohio. The bank did not engage in any merger and acquisition activity during the evaluation period.

As a locally owned community bank, FCN offers a variety of loan products, deposit accounts, and other services to meet the personal and business banking needs of its customers. Loan products include various types of home mortgage loans, commercial real estate loans, small business loans, and farm loans. Deposit accounts consist of checking and savings accounts, money market accounts, certificates of deposit, health savings accounts, individual retirement accounts, and sweep accounts. Other available banking services include overdraft protection, wire transfers, remote deposit capture, safe deposit boxes, cash management services, merchant services, online banking, and mobile banking.

FCN is an interstate financial institution with six offices, one drive-up facility, and seven automated teller machines (ATMs). The main office and drive-up facility are in Brookville, Indiana. In addition, FCN has five branch offices in Batesville, Connersville, Lawrenceburg, and Sunman, Indiana, and Harrison, Ohio. ATMs are available at each branch and the drive-up. There is also a stand-alone ATM located in Connersville, Indiana. Given this market footprint, FCN has two AAs, one in the State of Indiana (Indiana Non-MSA) and one in the Cincinnati OH-KY-IN MSA (Cincinnati MMSA).

As of December 31, 2023, FCN had total assets of \$791.4 million, total deposits of \$710 million, and tier one capital of \$70.6 million. Gross loans and leases of \$482.9 million represent approximately 61 percent of total assets. The loan portfolio consists of residential real estate loans (45 percent), commercial real estate loans (35 percent), commercial and industrial loans (8 percent), farm loans (8 percent), consumer loans (2 percent), and other loans (2 percent). Loans originated during the evaluation period were also concentrated in home mortgage loans (residential real estate) and business loans (commercial real estate/commercial and industrial). Home mortgage loans account for 56.6 percent by number and 60.1 percent by dollar amount. Business loans account for 22.4 percent by number and 34.3 percent by dollar amount.

FCN's lending activities are consistent with its size, expertise, financial capacity, and local economic conditions. There are no legal, financial, or other factors that affect its ability to help meet the needs of its AAs. FCN received an Outstanding rating for its CRA performance during the prior evaluation period. This rating was reported in the Office of the Comptroller of the Currency's (OCC) CRA Performance Evaluation dated April 26, 2021.

## **Scope of the Evaluation**

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

This evaluation is based on FCN's CRA performance from January 1, 2021, to December 31, 2023. The OCC assessed performance using Intermediate Small Bank examination procedures, which include a Lending Test and a CD Test. The Lending Test is used to evaluate FCN's record of meeting the credit needs for each AA with respect to its primary loan products. The CD Test is used to evaluate FCN's responsiveness to the CD needs of its AAs through use of loans, qualified investments, and services with a CD purpose. As previously stated, home mortgage and business loans are considered FCN's primary loan products, based on the number and dollar amount of loans originated during the evaluation period. No affiliate activity is included.

To evaluate the bank's performance for the Lending Test, the OCC relied on internal bank reports for business loans. In each AA, the OCC sampled at least 60 loans originated or purchased during the evaluation period to analyze the bank's performance for business loans. The OCC used all Home Mortgage Disclosure Act (HMDA) data for 2021, 2022, and 2023 to analyze the bank's performance for home mortgage loans. Unless otherwise noted, OCC gave more weight to home mortgage loans given this loan product represented a greater percentage of total loan originations during the evaluation period.

There were no MSA boundary changes introduced by the Office of Management and Budget that affected FCN's AAs. However, the AAs were affected by the 2020 Census data update that resulted in changes to some census tract (CT) boundaries and/or the income designation of the CT. These changes became effective January 1, 2022. As a result, the analysis of geographic and borrower loan distributions consists of two time periods, 2021 and 2022-2023. The demographic data presented in this evaluation is either from the 2015 American Community Survey (ACS) for 2021 or the 2020 U.S. Census for 2022-2023. Unless otherwise noted, OCC gave more weight to performance in 2022-2023 as it represented the largest portion of the evaluation period.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

FCN has two AAs, one in the Cincinnati MMSA and one in the State of Indiana. As such, OCC completed a full-scope review of both AAs. Refer to Appendix A, Scope of Examination, for more information on the scope of the review.

### **Ratings**

The bank's overall rating is a blend of the state rating for Indiana and the multistate rating for the Cincinnati MMSA. The OCC placed more weight on the Cincinnati MMSA given FCN's offices, deposits, and home mortgage originations are concentrated in this rating area. Four of six offices, 69.5 percent of home mortgage loans originated and purchased during the evaluation period, and 80.8 percent of total deposits as of June 30, 2023, were in the Cincinnati MMSA.

The MMSA rating and state ratings are based on performance in all bank AAs. FCN has one AA in each rating area. Therefore, both AAs are weighted as 100 percent of the respective rating area.

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

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## **Multistate Metropolitan Statistical Area Rating**

### **Cincinnati OH-KY-IN MMSA**

**CRA rating for the Cincinnati OH-KY-IN MMSA<sup>1</sup>: Outstanding.**

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

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

The major factors that support this rating include:

- An excellent geographic distribution of loans across geographies of different income levels,
- An excellent distribution of loans to borrowers of different income levels and businesses of different sizes, and
- Excellent responsiveness to CD needs in the AA through a combination of CD loans, qualified investments, and CD services.

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

FCN has four offices and a drive-up facility in the Cincinnati MMSA. Three of these offices and the drive-up are in southeastern Indiana and one office is in southwestern Ohio. The main office and drive-up facility in Brookville, Indiana, and the branch in Batesville, Indiana are in Franklin County. The branch in Lawrenceburg, Indiana is in Dearborn County and the branch in Harrison, Ohio is in Hamilton County. As of the end of the evaluation period, the Brookville office, Brookville drive-up and the Lawrenceburg office were in a moderate-income CT. The Batesville and Harrison offices were in an upper-income CT.

Based on this footprint and lending activity during the evaluation period, the Cincinnati MMSA has one AA. This AA includes all of Dearborn, Franklin, Union, and Hamilton counties, and a portion of Butler County.

Additional information regarding FCN's operations, demographic data, job market, housing cost, competition, and credit needs is discussed below. This information provides further performance context for FCN's operations in the Cincinnati MMSA.

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

**Cincinnati MMSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati MMSA (2021)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	246	16.7	24.8	31.7	24.4	2.4
Population by Geography	916,402	12.1	21.8	35.1	28.6	2.3
Housing Units by Geography	421,162	14.6	22.9	34.5	26.8	1.1
Owner-Occupied Units by Geography	222,348	5.3	18.2	40.5	35.8	0.2
Occupied Rental Units by Geography	149,254	23.4	29.4	27.9	17.2	2.0
Vacant Units by Geography	49,560	30.0	24.9	27.3	15.5	2.3
Businesses by Geography	72,623	7.9	22.7	30.6	36.9	2.0
Farms by Geography	1,895	4.1	14.7	53.0	27.9	0.4
Family Distribution by Income Level	221,048	25.7	16.2	18.6	39.5	0.0
Household Distribution by Income Level	371,602	29.8	15.8	16.0	38.4	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$157,763
2021 FFIEC Updated Median Family Income		\$81,900	Median Gross Rent			\$725
					Families Below Poverty Level	12.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data                      Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati MMSA (2022-2023)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	254	13.4	26.0	31.9	23.6	5.1
Population by Geography	944,664	10.3	26.3	33.5	26.9	2.9
Housing Units by Geography	425,444	11.2	27.3	32.6	25.7	3.2
Owner-Occupied Units by Geography	232,417	4.8	22.3	38.5	33.1	1.2
Occupied Rental Units by Geography	153,398	18.2	34.4	25.5	16.8	5.1
Vacant Units by Geography	39,629	21.0	29.3	25.2	16.9	7.6
Businesses by Geography	153,786	7.9	22.5	30.5	37.2	2.0
Farms by Geography	3,267	4.6	18.8	41.8	33.4	1.5
Family Distribution by Income Level	225,639	24.3	17.5	20.2	38.0	0.0
Household Distribution by Income Level	385,815	29.0	15.9	16.9	38.1	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$84,990	Median Housing Value			\$182,187
2023 FFIEC Updated Median Family Income		\$102,300	Median Gross Rent			\$847
			Families Below Poverty Level			9.6%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

***Job Market***

Business demographic data from the 2020 Census and 2023 Dun and Bradstreet (D&B) shows the primary industries are services (33.4 percent), finance, insurance, and real estate (12.9 percent), and retail trade (8.8 percent). In addition, a notable percentage of establishments are categorized as non-classifiable (28.6 percent). Some of the major employers in the Cincinnati MMSA include:

<b>Major Employers</b>	
Dearborn County	Hollywood Casino-Hotel, Matthews Aurora Funeral Solutions, Perfect North Slopes, and Walmart Supercenter
Franklin County	Local schools, Brookville Healthcare Center, Brookville Reservoir, and Owens Corning
Union County	NSK Corporation, Ainsley’s Café, First Merchants Bank, and local schools
Butler County	AK Steel Holding Corp., Express Scripts, Miami University, and Tyson Foods
Hamilton County	Cincinnati Children’s Hospital, Kroger Co., Fifth Third Bancorp, and Proctor & Gamble Co.
<i>Source: STATS Indiana; Ohio Department of Development County Profiles</i>	

The average annual unemployment rate in all counties has improved since the pandemic and is relatively low. Comparatively, the unemployment rate was similar among the counties with all

being better than the rate for the state of Indiana or Ohio. Both the state and county rates are currently less than 4 percent, indicating those that want full-time work should be able to find a job. According to the Bureau of Labor Statistics, the annual average unemployment rates for the five counties in the AA, Indiana, and Ohio were as follows:

<b>Average Annual Unemployment Rates</b>			
	<b>2021</b>	<b>2022</b>	<b>2023</b>
State of Indiana	3.9	3.1	3.3
Dearborn County	3.3	2.7	3.3
Franklin County	3.0	2.7	3.1
Union County	2.6	2.5	2.9
State of Ohio	5.1	4.0	3.5
Hamilton County	4.9	3.6	3.2
Butler County	4.5	3.6	3.2

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

**Housing Cost**

A home mortgage may not be affordable for all low- and moderate-income families in the AA. The demographic data in the table below shows the median housing value for the AA was at least 3.6 to 3.9 times the annual income of low-income families and was at least 2.2 to 2.4 times the annual income of moderate-income families.

<b>Housing Value vs Annual Income</b>		
	<b>2021</b>	<b>2023</b>
Median Housing Value (MHV)	\$157,763	\$182,187
Median Family Income (MFI)	\$ 81,900	\$102,300
Low Income Level (<50% MFI)	\$ 40,950	\$ 51,150
Moderate-Income Level (<80% MFI)	\$ 65,520	\$ 81,840

*Source: 2015 and 2020 ACS Census; 2021 and 2023 Updated FFIEC MFI*

According to Realtor.com, the median list price for homes rose during the evaluation period and was higher than the median housing value indicated by the Census data. From January 2021 to December 2023, the median list price of homes for the Cincinnati MMSA increased from \$305,000 to \$335,000.

Based on these list prices, the estimated payment for a 30-year mortgage with a five percent interest rate is \$1,798 per month. On these terms and not accounting for down payment, homeowners’ insurance, real estate taxes, or any additional monthly expenses, all low- and some moderate-income families would be challenged to qualify for a mortgage loan in the AA. Low-income families with annual income at 50 percent of the updated FFIEC MFI could afford a maximum mortgage payment of \$1,024 per month in 2021, \$1,218 per month in 2022, and \$1,279 per month in 2023. Moderate-income families with an annual income at 80 percent of the FFIEC MFI could afford a maximum mortgage payment of \$1,638 per month in 2021, \$1,948 per month in 2022, and \$2,046 per month in 2023.

Competition

Competition for deposits is significant given the number and size of the financial institutions with offices in the Cincinnati MMSA. As of June 30, 2023, Federal Deposit Insurance Corporation (FDIC) deposit data shows FCN and 43 other FDIC-insured banks have 362 offices with 172.1 billion in deposits. The top two banks, U.S. Bank and Fifth Third Bank, collectively have 105 offices and hold 85.5 percent of the deposit market share. In comparison, FCN's four offices have total deposits of \$537.7 million. This level represents a market share of 0.3 percent, which ranks FCN tenth in the group.

Aggregate data collected from all lenders required to report home mortgage and CRA loans indicates significant competition for home mortgage and business loans also exists.

- Aggregate HMDA data for 2021 shows 517 lenders originated or purchased 48,914 home mortgage loans. In 2022, 495 lenders originated or purchased 30,340 home mortgage loans. The top five lenders captured 28.1 percent of the market share in 2021 and 24.5 percent in 2022. Union Savings Bank was the top lender in 2021 with a market share of 8.2 percent and Fifth Third Bank was the top lender in 2022 with a market share of 7.7 percent. Other top lenders in 2021 were Fifth Third Bank, U.S. Bank, Guardian Savings Bank, and Huntington National Bank. In 2022, Union Savings Bank, U.S. Bank, Huntington National Bank, and Third Federal were the other top lenders. FCN ranked 38th in 2021 with a market share of 0.6 percent and 53rd in 2022 with a market share of 0.4 percent.
- Aggregate CRA data for 2021 shows 162 lenders originated or purchased 29,600 small loans to businesses. In 2022, 144 lenders originated or purchased 27,554 small loans to businesses. The top five lenders captured 56.6 percent of the market share in 2021 and 65.4 percent in 2022. American Express was the top lender in both years with a market share of 18.5 percent in 2021 and 25.1 percent in 2022. Other top lenders in 2021 and 2022 were U.S. Bank, JPMorgan Chase Bank, Fifth Third Bank, and Capital One Bank. FCN is not required to report CRA loan data, so its lending activity is not included in the aggregate data.

Community Contact

The OCC considered information from an interagency listening session with representatives from several community organizations in the Cincinnati area. The participants noted that banks are generally meeting the needs of the community. However, needs/challenges regarding affordable housing do still exist. One of these needs is more affordable home ownership options for low- and moderate-income individuals/families. Another need is the preservation of existing affordable homes and rentals due to concerns with gentrification and displacement of long-term residents as home values increase. Other affordable housing challenges discussed were a gap in incentives to create affordable housing, lack of small dollar mortgage products for homes under \$100,000, and the need for financial education regarding use of credit card and new fintech products (e.g. cash apps). Based on these needs/challenges, the participants believe there are opportunities for banks to help further by (1) establishing long-term and financial relationships with Community Development Corporations (CDCs), (2) developing consistent bank outreach and education programs, (3) providing small dollar consumer loans and home repair loan

products with affordable rates, and (4) adding/maintaining brick-and-mortar branches in low- and moderate-income communities and offering CD services out of these facilities.

## **Scope of Evaluation in Cincinnati OH-KY-IN MMSA**

FCN has one AA in the Cincinnati OH-KY-IN MMSA, the Cincinnati MMSA. The OCC performed a full-scope review of this AA. The data for the three Indiana counties and two Ohio counties in the MMSA is combined, presented, and analyzed as one AA for purposes of this evaluation. As previously noted, the OCC placed more weight on home mortgage loans and the 2022-2023 analysis period.

## **Conclusions with Respect to Performance Tests in Cincinnati OH-KY-IN 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 is excellent.

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

The bank exhibits an excellent geographic distribution of loans in the MMSA. The OCC considered FCN's only branch in Harrison, Ohio is approximately 25 miles from Cincinnati, Ohio where most of the low- and moderate-income geographies are located. Generally, the OCC also placed more weight on FCN's performance in moderate-income CTs as these areas had a higher percentage of owner-occupied housing units (OOHUs) and businesses than the low-income CTs.

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

FCN's overall geographic distribution of home mortgage loans in the Cincinnati MMSA is excellent. This conclusion is based on the following performance:

- In 2021, FCN's percentage of home mortgage made in low-income CTs was below the percentage of OOHUs and the aggregate percentage. FCN's percentage of home mortgage loans made in moderate-income CTs exceeded the percentage of OOHUs and the aggregate percentage.
- In 2022-2023, FCN's percentage of home mortgage loans in low- and moderate-income CTs exceeded the percentage of OOHUs and the aggregate percentage.
- For 2021-2023, FCN made 26 loans in low-income CTs and 146 loans in moderate-income CTs. Respectively, these numbers represent 4.3 percent and 23.9 percent of total home mortgage loans made during the evaluation period.

Refer to Table O in the "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.

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

FCN's overall geographic distribution of small loans to businesses in the Cincinnati MMSA is excellent. This conclusion is based on the following performance:

- In 2021, FCN did not make any small loans to businesses in low-income geographies. FCN's percentage of small loans to businesses in moderate-income CTs exceeded the percentage of businesses and the aggregate percentage.
- In 2022-2023, FCN's percentage of small loans to businesses in low- and moderate-income CTs exceeded the percentage of businesses and the aggregate percentage.
- For 2021-2023, FCN had five loans in low-income CTs and 18 loans in moderate-income CTs. Respectively, these numbers represent 7.4 percent and 26.5 percent of total small loans to businesses that OCC sampled.

Refer to Table Q in the "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.

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

The OCC used summary reports and maps to analyze the geographic distribution of FCN's lending activity during the evaluation period. Examiners did not identify any unexplained conspicuous lending gaps.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. For context, the OCC considered several factors that limited lending opportunities in general. These factors include significant competition, pandemic environment, and rising interest rates. In addition, OCC considered housing costs relative to MFI and families below poverty as additional factors that limit home mortgage loans to low- and moderate-income borrowers.

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

FCN's overall borrower distribution of home mortgage loans in the Cincinnati MMSA is excellent. This conclusion is based on the following performance:

- In 2021, FCN's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage. FCN's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate percentage.
- In 2022-2023, FCN's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but near to the aggregate percentage. FCN's percentage of home mortgage loans to moderate-income families was near to the percentage of moderate-income families but below the aggregate percentage. OCC considered the impact of FCN's higher percentage of borrowers for which income was not available. If loans without income data are excluded from the distribution, FCN's

percentage of loans to low- and moderate-income borrowers is 18.4 percent and 26.8 percent, respectively.

- For 2021-2023, FCN made 69 loans to low-income borrowers and 127 loans to moderate-income borrowers. Respectively, these numbers represent 11.3 percent and 20.7 percent of total home mortgage loans made during the evaluation period.

Refer to Table P in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

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

FCN’s overall borrower distribution of small loans to businesses in the Cincinnati MMSA is excellent. This conclusion is based on the following performance:

- In 2021, FCN’s percentage of small loans to businesses with revenues less than \$1.0 million was below the percentage of such businesses but exceeded the aggregate percentage.
- In 2022-23, FCN’s percentage of small loans to businesses with revenues less than \$1.0 million was below the percentage of such businesses but exceeded the aggregate percentage.
- For 2021-2023, FCN had 51 small loans to businesses with revenues less than \$1.0 million. This number represents 75 percent of total small loans to businesses that OCC sampled.

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

### **Responses to Complaints**

FCN did not receive any complaints regarding its CRA performance during the evaluation period.

## **Community Development Test**

The bank’s performance under the Community Development Test in the Cincinnati MMSA is rated Outstanding.

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

**Number and Amount of Community Development Loans**

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Cincinnati MMSA	189	99.0	5,386	99.0
Statewide/Regional Area with Direct Benefit to AA	2	1.0	52	1.0

FCN’s CD lending demonstrates excellent responsiveness to CD needs in the AA. FCN originated 189 loans totaling \$5.4 million or 9.5 percent of the bank’s allocated tier one capital at December 31, 2023. All loans were made through the Small Business Administration’s (SBA’s) Paycheck Protection Program (PPP), an innovative and flexible loan program to help businesses keep their workforce employed during the COVID-19 pandemic. Of the 189 loans, one loan totaling \$31,144 was in a low-income CT and 35 loans totaling \$740,079 were in a moderate-income CT.

Broader Statewide/Regional Area

FCN is responsive to the CD needs and opportunities in its AA; therefore, the OCC also considered CD lending in the broader regional area that provided direct benefit to the bank’s AA. Within the broader regional area, FCN originated two SBA PPP loans totaling \$52,474. Both loans were made in Butler County Ohio.

**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)
Cincinnati MMSA	0	0	42	66	42	100.0	66	100.0	0	0

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

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

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

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

FCN's qualified investments demonstrate adequate responsiveness to CD needs in the AA. FCN made 42 donations totaling \$66,124 or 0.1 percent of allocated tier one capital. These donations supported 19 different organizations that provide various community services, including education, healthcare, youth programs, and financial literacy for low- and moderate-income children and/or adults. FCN also donated to the main street sustainability fund, which supports revitalization and economic development. In addition, FCN donated 2,600 food items to an organization that provides services and support to victims of domestic and sexual abuse.

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

FCN provided an excellent level of CD services in the AA. During the evaluation period, eight employees provided CD services to eight different organizations in the AA. These employees spent approximately 2,220 hours providing their technical and financial expertise to these organizations. The OCC noted that most bank personnel often served in a leadership role as a board member, treasurer, or committee member for various organizations that provide community services to low- and moderate-income residents or promote economic development. In addition, bank employees meet quarterly with residents of an affordable housing project to discuss various topics regarding financial literacy.

## **State Rating**

### **State of Indiana**

**CRA rating for the State of Indiana: Satisfactory**

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

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

The major factors that support this rating include:

- A reasonable geographic distribution of loans across geographies of different income levels,
- A reasonable distribution of loans to borrowers of different income levels and businesses of different sizes, and
- Excellent responsiveness to CD needs in the AA through a combination of CD loans, qualified investments, and CD services.



## Description of Institution's Operations in Indiana

FCN has two branch offices and a stand-alone ATM in the Indiana Non-MSA. The office in Connersville, Indiana is in Fayette County and the office in Sunman, Indiana is in Ripley County. As of the end of the evaluation period, the Connersville office was in a middle-income CT and the Sunman office was in an upper-income CT.

Based on this footprint and lending activity during the evaluation period, the Indiana Non-MSA has one AA. This AA includes all of Fayette County and a portion of Ripley, Decatur, and Rush counties.

Additional information regarding FCN's operations, demographic data, job market, housing cost, competition, and credit needs is discussed below. This information provides further performance context for FCN's operations in the Indiana Non-MSA.

### Indiana Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indiana Non-MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	26.3	47.4	26.3	0.0
Population by Geography	77,369	0.0	22.1	44.4	33.6	0.0
Housing Units by Geography	33,815	0.0	24.9	43.1	31.9	0.0
Owner-Occupied Units by Geography	21,361	0.0	19.4	45.9	34.7	0.0
Occupied Rental Units by Geography	9,034	0.0	34.8	38.5	26.7	0.0
Vacant Units by Geography	3,420	0.0	33.5	38.0	28.5	0.0
Businesses by Geography	5,582	0.0	23.8	36.0	40.2	0.0
Farms by Geography	651	0.0	10.1	33.6	56.2	0.0
Family Distribution by Income Level	20,999	19.4	19.3	21.0	40.3	0.0
Household Distribution by Income Level	30,395	23.1	15.8	20.3	40.7	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$111,019
2021 FFIEC Updated Median Family Income		\$64,600	Median Gross Rent			\$664
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Indiana Non-MSA (2022-2023)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	20	0.0	10.0	65.0	25.0	0.0
Population by Geography	77,641	0.0	9.7	63.4	26.9	0.0
Housing Units by Geography	34,627	0.0	10.5	63.3	26.2	0.0
Owner-Occupied Units by Geography	21,691	0.0	8.3	63.3	28.5	0.0
Occupied Rental Units by Geography	9,459	0.0	15.8	63.3	20.9	0.0
Vacant Units by Geography	3,477	0.0	10.2	63.6	26.2	0.0
Businesses by Geography	6,914	0.0	8.5	62.0	29.6	0.0
Farms by Geography	804	0.0	1.9	68.2	30.0	0.0
Family Distribution by Income Level	20,879	19.1	18.3	22.7	39.9	0.0
Household Distribution by Income Level	31,150	22.3	16.4	19.3	42.0	0.0
Median Family Income Non-MSAs - IN		\$67,032	Median Housing Value			\$127,653
2023 Updated Median Family Income		\$82,700	Median Gross Rent			\$712
			Families Below Poverty Level			9.9%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data                      Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Job Market**

Business demographic data from the 2020 Census and 2023 Dun and Bradstreet (D&B) shows the primary industries are services (31.9 percent), retail trade (11.2 percent), and agriculture, forestry, and fishing (10.4 percent). In addition, a notable percentage of establishments are categorized as non-classifiable (17.5 percent). Some of the major employers in the Indiana Non-MSA include:

<b>Major Employers</b>	
Decatur County	CTB Inc., Delta Faucet Co., Honda Manufacturing of Indiana, and Valeo Engine Cooling Inc.
Fayette County	Stant Corp., Walmart Supercenter, Premier Healthcare, and Ivy Tech Community College.
Ripley County	Hillenbrand Inc., Mary Margaret Health, Ripley County Auditor, and Occasions Group.
Rush County	Rush Memorial Hospital, Copeland Corp., Intat Precision Inc., and Fraley & Schilling Inc.
<i>Source: STATS Indiana</i>	

The average annual unemployment rate in all counties has improved since the pandemic and is relatively low. Comparatively, the unemployment rate for all counties, except Fayette, is lower than the rate for the state of Indiana. The state and county rates have been relatively stable and are currently less than 5 percent, indicating those that want full-time work should be able to find

a job. According to the Bureau of Labor Statistics, the annual average unemployment rates for the four counties in the AA and Indiana were as follows:

<b>Average Annual Unemployment Rates</b>			
	<b>2021</b>	<b>2022</b>	<b>2023</b>
State of Indiana	3.9	3.1	3.3
Decatur County	3.2	2.6	2.7
Fayette County	4.9	4.5	4.4
Ripley County	3.1	3.1	3.1
Rush County	3.1	2.5	2.7
<i>Source: Bureau of Labor Statistics; Rates Not Seasonally Adjusted</i>			

### Housing Market

A home mortgage may not be affordable for all low- and moderate-income families in the AA. The demographic data in the table below shows the median housing value for the AA was at least 3.1 to 3.4 times the annual income of low-income families and at least 1.9 to 2.1 times the annual income of moderate-income families.

<b>Housing Value vs Annual Income</b>		
	<b>2021</b>	<b>2023</b>
Median Housing Value (MHV)	111,019	127,653
Median Family Income (MFI)	64,600	82,700
Low Income Level (<50% MFI)	32,300	41,350
Moderate-Income Level (<80% MFI)	51,680	66,160
<i>Source: 2015 and 2020 ACS Census; 2021 and 2023 Updated FFIEC MFI</i>		

According to Realtor.com, the median list price for homes rose during the evaluation period and was higher than the median housing value indicated by the Census data. From January 2021 to December 2023, the median list price of homes increased from \$95,000 to \$179,000 in Fayette County, from \$130,000 to \$195,000 in Rush County, from \$168,000 to \$237,000 in Ripley County, and from \$188,000 to \$240,000 in Decatur County.

Based on the average list price of the four-county area, the estimated payment for a 30-year mortgage with a five percent interest rate is \$1,142. On these terms and not accounting for down payment, homeowners' insurance real estate taxes, or any additional monthly expenses, all low-income families and some moderate-income families would be challenged to qualify for a mortgage loan in the AA. Low-income families with an annual income at 50 percent of the updated FFIEC MFI could afford a maximum mortgage payment of \$808 per month in 2021, \$931 per month in 2022, and \$1,034 per month in 2023. Moderate-income families with an annual income of 80 percent of the updated FFIEC MFI could afford a maximum mortgage payment of \$1,292 per month in 2021, \$1,490 per month in 2022, and \$1,654 per month in 2023.

Competition

Competition for deposits is strong given the number and size of the financial institutions with offices in the Indiana Non-MSA. As of June 30, 2023, FDIC deposit data shows FCN and 14 other FDIC-insured banks have 36 offices with \$2.2 billion in deposits. The top three banks, First Financial Bank, The Napoleon State Bank, and Fifth Third, collectively have 16 offices and hold 53.2 percent of the deposit market share. In comparison, FCN's two offices have total deposits of \$129.4 million. This level represents a market share of 5.6 percent, which ranks FCN sixth in the group.

Aggregate data collected from all lenders required to report home mortgage and CRA loans indicates there is strong competition for home mortgage and business loans.

- Aggregate HMDA data for 2021 shows 200 lenders originated or purchased 3,231 home mortgage loans. In 2022, 186 lenders originated or purchased 2,416 home mortgage loans. The top five lenders captured 32.1 percent of the market share in 2021 and 33.1 percent in 2022. First Financial Bank was the top lender both years with a market share of 11.2 percent in 2021 and 12.5 percent in 2022. Other top lenders in 2021 and 2022 were Fifth Third Bank, Rocket Mortgage, Union Savings and Loan Association, and Civista Bank. FCN ranked fifth in 2021 with a market share of 3.8 percent and sixth in 2022 with a market share of 3.2 percent.
- Aggregate CRA data for 2021 shows 64 lenders originated or purchased 1,368 small loans to businesses. In 2022, 61 lenders originated or purchased 1,093 small loans to businesses. The top five lenders captured 55.9 percent of the market share in 2021 and 61 percent in 2022. First Financial Bank was the top lender in 2021 with a market share of 21.7 percent and American Express was the top lender in 2022 with a market share of 15.5 percent. Other top lenders in 2021 were U.S. Bank, JPMorgan Chase Bank, American Express, and German American Bank. In 2022, U.S. Bank, JPMorgan Chase Bank, Capital One, Synchrony Bank were the other top lenders. FCN is not required to report CRA loan data, so its lending activity is not included in the aggregate data.

Community Contact

OCC considered comments from a community contact involved with a not-for-profit agency that offers various community services from offices in eight counties, including two counties in the AA (Fayette and Rush). The agency designs, sponsors, and administers programs that provide help for today and hope for tomorrow. In addition, the agency provides resources to the community so that they have access to the information needed to be successful.

The contact noted that according to the 2023 community needs assessment (CNA), 14.4 percent of residents in the service area have experienced poverty. The contact further shared that quality and affordable housing remains a critical need. The contact stated many small landlords have raised rents to cover higher property taxes resulting from increasing home values. As a result, LMI renters are being priced out. In addition, the contact mentioned building a home that is affordable for LMI families is more difficult due to increasing construction costs and rising interest rates. The contact further commented that the Individual Development Account Program (IDA), a structured matched savings program, has helped some participants purchase vehicles, but like housing, cars have become more expensive and even the cost of a used car can be prohibitive for their clients.

The 2023 CNA also identified other client needs as assistance with legal services, good jobs with higher wages/benefits/advancement opportunities, programs and activities for seniors, and budgeting classes or credit counseling/repair. In comparison, the top five needs from the 2020 CNA were good jobs with higher wages/benefits/advancement opportunities, programs and activities for youth, addiction treatment services, second chance hiring programs for those with criminal records, and quality and affordable housing.

## **Scope of Evaluation in Indiana**

FCN has one AA in Indiana, the Indiana Non-MSA. OCC performed a full-scope review of this AA. The data for the four Indiana counties in the Non-MSA is combined, presented, and analyzed as one AA for purposes of this evaluation. As previously noted, the OCC placed more weight on home mortgage loans and the 2022-2023 analysis period.

## **Conclusions in Respect to Performance Tests in Indiana**

### **Lending Test**

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

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

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

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

The bank exhibits a reasonable geographic distribution of loans in the state. For context, the OCC considered impact of demographic changes. As shown in Table A above, there were no low-income CTs and five moderate-income CTs in the AA for 2021 and no low-income CTs and two moderate-income CTs for 2022-2023.

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

FCN's overall geographic distribution of home mortgage loans in the Indiana Non-MSA is reasonable. This conclusion is based on the following performance:

- In 2021, FCN's percentage of home mortgage loans made in moderate-income CTs was below both the percentage of OOHUs and the aggregate percentage.
- In 2022-2023, FCN's percentage of home mortgage loans made in moderate-income CTs was near to the percentage of OOHUs and the aggregate percentage.
- For 2021-2023, FCN made 29 loans in moderate-income CTs. This represents 10.8 percent of total home mortgage loans made during the evaluation period. Performance is reasonable given the strong competition and decrease in OOHUs. According to the

demographic data, there were 4,144 OOHUs in moderate-income CTs in 2021 and 1,894 OOHUs in 2022.

Refer to Table O in the state of 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.

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

FCN's overall geographic distribution of small loans to businesses in the Indiana Non-MSA is reasonable. This conclusion is based on the following performance:

- In 2021, FCN's percentage of small loans to businesses in moderate-income CTs was well below the percentage of businesses and the aggregate percentage.
- In 2022-2023, FCN's percentage of small loans to businesses in moderate-income CTs exceeded the percentage of businesses and the aggregate percentage.
- For 2021-2023, FCN had five small loans to businesses in moderate-income CTs. This number represents 8.3 percent of total small loans to businesses that OCC sampled. Performance is reasonable given the strong competition and limited number of businesses in the moderate-income CTs. According to demographic data, there were 1,329 businesses in moderate-income CTs in 2021 and 588 businesses in 2022.

Refer to Table Q in the state of 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.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. Again, the OCC considered several factors that limited lending opportunities in general. These factors include significant competition, pandemic environment, and rising interest rates. In addition, OCC considered housing costs relative to MFI and families below poverty as additional factors that limit home mortgage loans to low- and moderate-income borrowers.

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

FCN's overall borrower distribution of home mortgage loans in the Indiana non-MSA is reasonable. This conclusion is based on the following performance:

- In 2021, FCN's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but approximated the aggregate percentage. FCN's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and was near to the aggregate percentage.
- In 2022-2023, FCN's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families but exceeded the aggregate percentage.

FCN's percentage of home mortgage loans to moderate-income families was below percentage of moderate-income families and well below the aggregate percentage.

- For 2022-2023, FCN made 34 loans to low-income borrowers and 42 loans to moderate-income borrowers. Respectively, these numbers represent 12.7 percent and 15.7 percent of total home mortgage loans made during the evaluation period.

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

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

FCN's overall borrower distribution of small loans to businesses in the Indiana Non-MSA is excellent. This conclusion is based on the following performance:

- In 2021, FCN's percentage of small loans to businesses with revenues less than \$1.0 million was below the percentage of such businesses but exceeded the aggregate percentage.
- In 2022-23, FCN's percentage of small loans to businesses with revenues less than \$1.0 million was below the percentage of such businesses but exceeded the aggregate percentage.
- For 2021-2023, FCN had 42 small loans to businesses with revenues less than \$1.0 million. This number represents 70 percent of total small loans to businesses that OCC sampled.

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

### **Responses to Complaints**

FCN has not received any complaints regarding its CRA performance in the state of Indiana.

## **Community Development Test**

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

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

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

**Number and Amount of Community Development Loans**

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Indiana Non-MSA	95	100.0	4,801	100.0

FCN’s CD lending demonstrates excellent responsiveness to CD needs in the AA. FCN originated 95 loans totaling \$4.8 million or 36.4 percent of the bank’s allocated tier one capital at December 31, 2023. All loans were made through the SBA’s PPP, an innovative and flexible loan program to help businesses keep their workforce employed during the COVID-19 pandemic. Of the 95 loans, five loans totaling \$92,099 were in a moderate-income CT.

**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)
Indiana Non-MSA	1	8	17	35	18	85.7	43	2.8	0	0
Statewide or Regional Area with Indirect Benefit to AA	2	923	1	577	3	14.3	1,500	97.2	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.*

FCN’s qualified investments demonstrate adequate responsiveness to CD needs in the AA. During the evaluation period, FCN made 18 qualified investments totaling \$612,299 or 4.5 percent of allocated tier one capital. These investments include 17 donations in the Indiana Non-MSA and one investment in the broader statewide or regional area. The donations in the AA supported eight different organizations that provide various community services, including education, healthcare, and youth programs for low- and moderate-income residents. FCN’s donations also helped fund restoration of an unkept and unsafe local park. In addition, FCN donated 149 clothing items to a pregnancy crisis center.

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



FCN also had three prior period investments totaling \$930,790 or 6.9 percent of allocated tier one capital as of December 31, 2023. These include the remaining balance of \$8,082 for the Great Lakes Capital Fund of Indiana XIX-2, an investment in an affordable housing fund, and two investments in the broader statewide or regional area.

#### Broader Statewide/Regional Area

FCN is responsive to the CD needs and opportunities in its AA; therefore, the OCC also considered CD investments in the broader regional area that provided indirect benefit to the bank's AA. During the evaluation period, FCN made one qualified investment for \$577,125 within the state of Indiana. FCN also had two prior period investments with an outstanding balance of \$922,708, on December 31, 2023. All three investments are revenue bonds for schools at which more than 50 percent of students qualify for free or reduced-price meals.

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

FCN provided an excellent level of CD services in the AA. During the evaluation period, four employees provided CD services to eight different organizations in the AA. These employees spent approximately 693 hours providing their technical and financial expertise to these organizations. The OCC noted that most bank personnel often served in a leadership role as a board member, treasurer, or finance committee member for various organizations that provide community services to low- and moderate-income residents or promote economic development. For example, one director serves on the finance committee for a local community foundation that connect donors and non-profit agencies, establishes endowments, and provides grants and educational scholarships.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed:</b>	01/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans CD loans, qualified investments, CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA</b>		
Cincinnati MMSA	Full Scope	IN: All of Dearborn, Franklin, and Union counties. OH: All of Hamilton County and a portion of Butler County.
<b>State of Indiana</b>		
Indiana Non-MSA	Full Scope	All of Fayette County and a portion of Decatur, Ripley, and Rush counties.

## Appendix B: Summary of MMSA and State Ratings

RATINGS FCN Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
FCN Bank, NA	Outstanding	Outstanding	Outstanding
MMSA or State:			
Cincinnati OH-KY-IN	Outstanding	Outstanding	Outstanding
Indiana	Satisfactory	Outstanding	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.



- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Cincinnati MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cincinnati MMSA	296	59,607,608	100.0	48,914	5.3	2.4	5.2	18.2	19.6	17.3	40.5	73.3	39.0	35.8	4.1	38.1	0.2	0.7	0.3
<b>Total</b>	<b>296</b>	<b>59,607,608</b>	<b>100.0</b>	<b>48,914</b>	<b>5.3</b>	<b>2.4</b>	<b>5.2</b>	<b>18.2</b>	<b>19.6</b>	<b>17.3</b>	<b>40.5</b>	<b>73.3</b>	<b>39.0</b>	<b>35.8</b>	<b>4.1</b>	<b>38.1</b>	<b>0.2</b>	<b>0.7</b>	<b>0.3</b>

Source: 2015 ACS; 01/01/2021 - 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																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cincinnati MMSA	315	76,940,315	100.0	30,340	4.8	6.0	4.9	22.3	27.9	24.2	38.5	50.2	38.0	33.1	14.6	31.6	1.2	1.3	1.3
<b>Total</b>	<b>315</b>	<b>76,940,315</b>	<b>100.0</b>	<b>30,340</b>	<b>4.8</b>	<b>6.0</b>	<b>4.9</b>	<b>22.3</b>	<b>27.9</b>	<b>24.2</b>	<b>38.5</b>	<b>50.2</b>	<b>38.0</b>	<b>33.1</b>	<b>14.6</b>	<b>31.6</b>	<b>1.2</b>	<b>1.3</b>	<b>1.3</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 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>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cincinnati MMSA	296	59,607,608	100.0	48,914	25.7	10.8	8.5	16.2	24.7	19.8	18.6	26.4	20.3	39.5	26.4	36.2	0.0	11.8	15.2
<b>Total</b>	<b>296</b>	<b>59,607,608</b>	<b>100.0</b>	<b>48,914</b>	<b>25.7</b>	<b>10.8</b>	<b>8.5</b>	<b>16.2</b>	<b>24.7</b>	<b>19.8</b>	<b>18.6</b>	<b>26.4</b>	<b>20.3</b>	<b>39.5</b>	<b>26.4</b>	<b>36.2</b>	<b>0.0</b>	<b>11.8</b>	<b>15.2</b>

*Source: 2015 ACS; 01/01/2021 - 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>2022-23</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cincinnati MMSA	315	76,940,315	100.0	30,340	24.3	11.7	13.1	17.5	17.1	21.8	20.2	16.2	19.6	38.0	18.7	29.7	0.0	36.2	15.7
<b>Total</b>	<b>315</b>	<b>76,940,315</b>	<b>100.0</b>	<b>30,340</b>	<b>24.3</b>	<b>11.7</b>	<b>13.1</b>	<b>17.5</b>	<b>17.1</b>	<b>21.8</b>	<b>20.2</b>	<b>16.2</b>	<b>19.6</b>	<b>38.0</b>	<b>18.7</b>	<b>29.7</b>	<b>0.0</b>	<b>36.2</b>	<b>15.7</b>

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cincinnati MMSA	23	4,215,399	100.0	22,088	7.9	0.0	8.8	22.7	26.1	22.6	30.6	65.2	29.9	36.9	4.3	37.3	2.0	4.3	1.4
<b>Total</b>	<b>23</b>	<b>4,215,399</b>	<b>100.0</b>	<b>22,088</b>	<b>7.9</b>	<b>0.0</b>	<b>8.8</b>	<b>22.7</b>	<b>26.1</b>	<b>22.6</b>	<b>30.6</b>	<b>65.2</b>	<b>29.9</b>	<b>36.9</b>	<b>4.3</b>	<b>37.3</b>	<b>2.0</b>	<b>4.3</b>	<b>1.4</b>

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cincinnati MMSA	45	10,040,693	100.0	20,531	7.9	11.1	7.6	22.5	26.7	21.8	30.5	55.6	33.5	37.2	6.7	35.1	2.0	0.0	2.0
<b>Total</b>	<b>45</b>	<b>10,040,693</b>	<b>100.0</b>	<b>20,531</b>	<b>7.9</b>	<b>11.1</b>	<b>7.6</b>	<b>22.5</b>	<b>26.7</b>	<b>21.8</b>	<b>30.5</b>	<b>55.6</b>	<b>33.5</b>	<b>37.2</b>	<b>6.7</b>	<b>35.1</b>	<b>2.0</b>	<b>0.0</b>	<b>2.0</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cincinnati MMSA	23	4,215,399	60.9	22,088	81.8	78.3	48.5	6.2	21.7	12.0	0.0	
<b>Total</b>	<b>23</b>	<b>4,215,399</b>	<b>60.9</b>	<b>22,088</b>	<b>81.8</b>	<b>78.3</b>	<b>48.5</b>	<b>6.2</b>	<b>21.7</b>	<b>12.0</b>	<b>0.0</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2022-23</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	
Cincinnati MMSA	45	10,040,693	51.7	20,531	90.7	73.3	51.0	2.9	24.4	6.4	2.2	
<b>Total</b>	<b>45</b>	<b>10,040,693</b>	<b>51.7</b>	<b>20,531</b>	<b>90.7</b>	<b>73.3</b>	<b>51.0</b>	<b>2.9</b>	<b>24.4</b>	<b>6.4</b>	<b>2.2</b>	
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

State of Indiana

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indiana Non-MSA	122	17,527,089	29.2	3,231	0.0	0.0	0.0	19.4	13.1	22.5	45.9	32.8	43.3	34.7	54.1	34.2	0.0	0.0	0.0
<b>Total</b>	<b>122</b>	<b>17,527,089</b>	<b>29.2</b>	<b>3,231</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>19.4</b>	<b>13.1</b>	<b>22.5</b>	<b>45.9</b>	<b>32.8</b>	<b>43.3</b>	<b>34.7</b>	<b>54.1</b>	<b>34.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" 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																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Indiana Non-MSA	146	19,829,716	100.0	2,416	0.0	0.0	0.0	8.3	8.9	9.8	63.3	54.1	63.5	28.5	37.0	26.7	0.0	0.0	0.0
<b>Total</b>	<b>146</b>	<b>19,829,716</b>	<b>100.0</b>	<b>2,416</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.3</b>	<b>8.9</b>	<b>9.8</b>	<b>63.3</b>	<b>54.1</b>	<b>63.5</b>	<b>28.5</b>	<b>37.0</b>	<b>26.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 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>2021</b>
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Indiana Non-MSA	122	17,527,089	100.0	3,231	19.4	9.0	9.3	19.3	18.9	22.7	21.0	20.5	22.9	40.3	45.1	28.6	0.0	6.6	16.6
<b>Total</b>	<b>122</b>	<b>17,527,089</b>	<b>100.0</b>	<b>3,231</b>	<b>19.4</b>	<b>9.0</b>	<b>9.3</b>	<b>19.3</b>	<b>18.9</b>	<b>22.7</b>	<b>21.0</b>	<b>20.5</b>	<b>22.9</b>	<b>40.3</b>	<b>45.1</b>	<b>28.6</b>	<b>0.0</b>	<b>6.6</b>	<b>16.6</b>

*Source: 2015 ACS; 01/01/2021 - 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>2022-23</b>
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Indiana Non-MSA	146	19,829,716	100.0	2,416	19.1	15.8	13.7	18.3	13.0	26.4	22.7	28.1	23.4	39.9	34.2	22.4	0.0	8.9	14.0
<b>Total</b>	<b>146</b>	<b>19,829,716</b>	<b>100.0</b>	<b>2,416</b>	<b>19.1</b>	<b>15.8</b>	<b>13.7</b>	<b>18.3</b>	<b>13.0</b>	<b>26.4</b>	<b>22.7</b>	<b>28.1</b>	<b>23.4</b>	<b>39.9</b>	<b>34.2</b>	<b>22.4</b>	<b>0.0</b>	<b>8.9</b>	<b>14.0</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 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																			2021
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
Indiana Non-MSA	20	2,705,108	100.0	1,064	0.0	0.0	0.0	23.8	5.0	22.4	36.0	35.0	33.3	40.2	60.0	44.4	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>2,705,108</b>	<b>100.0</b>	<b>1,064</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.8</b>	<b>5.0</b>	<b>22.4</b>	<b>36.0</b>	<b>35.0</b>	<b>33.3</b>	<b>40.2</b>	<b>60.0</b>	<b>44.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-23
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
Indiana Non-MSA	40	9,397,133	100.0	878	0.0	0.0	0.0	8.5	10.0	5.7	62.0	30.0	60.4	29.6	60.0	33.9	0.0	0.0	0.0
<b>Total</b>	<b>40</b>	<b>9,397,133</b>	<b>100.0</b>	<b>878</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.5</b>	<b>10.0</b>	<b>5.7</b>	<b>62.0</b>	<b>30.0</b>	<b>60.4</b>	<b>29.6</b>	<b>60.0</b>	<b>33.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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



<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Indiana Non-MSA	20	2,705,108	39.1	1,064	81.7	70.0	47.6	4.7	25.0	13.6	5.0	
<b>Total</b>	<b>20</b>	<b>2,705,108</b>	<b>39.1</b>	<b>1,064</b>	<b>81.7</b>	<b>70.0</b>	<b>47.6</b>	<b>4.7</b>	<b>25.0</b>	<b>13.6</b>	<b>5.0</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2022-23</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	
Indiana Non-MSA	40	9,397,133	48.3	878	85.0	70.0	53.9	3.8	25.0	11.2	5.0	
<b>Total</b>	<b>40</b>	<b>9,397,133</b>	<b>48.3</b>	<b>878</b>	<b>85.0</b>	<b>70.0</b>	<b>53.9</b>	<b>3.8</b>	<b>25.0</b>	<b>11.2</b>	<b>5.0</b>	
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												