



PUBLIC DISCLOSURE

June 10, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Warsaw Federal Savings and Loan Association
701158

3533 Warsaw Ave
Cincinnati, OH 45205-1850

Office of the Comptroller of the Currency

200 Public Square suite 1620
Cleveland, OH 44114-2301

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibited a reasonable geographic distribution of home mortgage loans.
- The bank exhibited a reasonable distribution of home mortgage loans among borrowers of different incomes.
- The bank had a reasonable loan-to-deposit (LTD) ratio.
- A majority of loans were originated inside the bank’s assessment area (AA).

Loan-to-Deposit Ratio

Considering Warsaw Federal Savings and Loan Association’s (Warsaw or the bank) size, financial condition, and credit needs of the AA, the bank’s LTD ratio is reasonable.

The bank’s quarterly LTD ratios for the period between January 1, 2020, to December 31, 2022, was 66.3 percent, with quarterly ratios ranging from 49.1 percent in the first quarter of 2021 to 90.7 percent in the fourth quarter of 2022. The quarterly average LTD ratio for four similarly situated banks was 97.3 percent ranging from a low of 57.4 percent to a high of 153.2 percent.

Lending in Assessment Area

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

The bank originated and purchased 74.8 percent by number and 74.7 percent by dollar amount of its total loans inside the bank’s AA 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.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	336	91.1	33	8.9	369	79,349	89.5	9,354	10.5	88,703
2021	151	76.7	46	23.4	197	36,354	81.6	8,212	18.4	44,566
2022	178	55.1	145	44.9	323	50,497	56.6	38,650	43.4	89,147
Total	665	74.8	224	25.2	889	166,200	74.7	56,216	25.3	222,416

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

Warsaw Federal Savings and Loan Association (Warsaw) is a stock savings and loan deposit institution. It is headquartered in Cincinnati, OH and wholly owned by First Mutual Holding Company (FMHC), which is owned by depositors of each of its affiliate banks. FMHC is a five-mutual holding company. FMHC is based in Lakewood, OH, and acquired Warsaw on March 1, 2020.

As of December 31, 2022, the bank's assets totaled \$71.7 million and tier one capital totaled 8.8 million, or 12.2 percent of total assets. The bank has two full-service branches located in Hamilton County. The bank did not open or close any branches during the evaluation period. The bank has two ATMs at the branches. The ATM at the main office takes deposits and the Sayler Park branch does not take deposits. The bank is a Multistate Metropolitan Statistical Area (MMSA) and has designated all of Hamilton, Butler, Clermont, Warren, and Brown Counties in Ohio, Kenton, Boone, Campbell, Pendleton, Gallatin, and Grant Counties in Kentucky, and Dearborn and Ohio Counties in Indiana as their AA. The AA comprises 542 contiguous census tracts (CTs) and is part of the Cincinnati, OH-KY-IN MMSA. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

The bank's primary loan products are residential real estate loans. The bank's loan portfolio increased 71.3 percent from \$31.2 million as of December 31, 2019, to \$53.5 million as of December 31, 2022. As of December 31, 2022, the loan portfolio was comprised of residential real estate loans (\$43.0 million or 80.3 percent), non-farm or non-residential loans (\$4.7 million or 8.8 percent), construction loans (\$4.1 million or 7.8 percent), multifamily loans (\$1.5 million or 2.8 percent), and commercial and industrial loans (\$187 thousand or 0.3 percent).

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2019, and June 30, 2022, deposits at the bank have decreased from \$48.1 million to \$47.9 million.

Warsaw offers traditional home loan products, including home mortgage loans, commercial and construction loans. The bank's consumer deposit-related products and services include checking, savings, certificates of deposit, debit cards, online banking, and mobile banking. Business products include checking, savings, business online banking, and business mobile banking.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AA. The bank received an "Outstanding" rating on their previous CRA performance evaluation dated, January 7, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank using small bank performance criteria, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the lending test is January 1, 2020, through December 31, 2022. This evaluation period included two census periods. For mortgage lending activity in 2020-2021, the OCC compared the bank's performance to the HMDA aggregate lender data as well as the 2015 American Community Survey (ACS) census data. Examiners specifically reviewed mortgage lending for

this evaluation, as this is the bank's primary product. For mortgage lending activity during 2022, the OCC compared the bank's performance to the aggregate lender data and the 2020 census data, which the FFIEC released in 2022. Emphasis was placed on 2022 lending performance as it was more recent and reflective of the bank's operating environment. Additionally, examiners considered consistent improvement year over year in bank performance.

Selection of Areas for Full-Scope Review

Examiners performed a full-scope review of the Cincinnati AA since it is the bank's only AA.

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. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on the multistate rating.

Examiners weighed information from the following performance criteria when analyzing the bank's primary lending products: LTD ratio, lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans. Refer to the "Scope" paragraph within the "Multistate Metropolitan Statistical Area Rating" section of this document for details regarding how the areas were weighted in arriving at the respective ratings.

The MMSA rating 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.

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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Multistate Metropolitan Statistical Area Rating

Cincinnati MMSA

CRA rating for the Cincinnati MMSA¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- Reasonable geographic distribution of home mortgage loans, and
- Reasonable distribution of home mortgage loans among borrowers of different incomes.

Description of Institution's Operations in Cincinnati MMSA

During the evaluation period, the bank operated two full-service branches within the AA. Both bank's branches are open Monday through Friday with identical hours. The main office also offers drive-through services on Saturday. Both offices are located in a moderate-income CT. Each office has an automated teller machine (ATM). The main office ATM is deposit taking while the other is a non-deposit taking ATM and are located at each branch and offer 24-hour accessibility. The bank did not open or close any branches during the evaluation period.

The Cincinnati AA is comprised of Hamilton, Butler, Clermont, Warren, and Brown counties in Ohio; Kenton, Boone, Campbell, Pendleton, Gallatin, and Grant counties in Kentucky; and Dearborn and Ohio counties in Indiana. The AA complies with regulatory requirements.

Based on 2015 ACS the AA had 493 CTs consisting of 63 low-income CTs, 114 moderate-income CTs, 183 middle-income CTs, 124 upper-income CTs, and nine CTs with no income classification. According to the 2020 U.S. Census data, there are now 542 CTs, 53 low-income CTs, 130 moderate-income CT, 198 middle-income CTs, and 145 upper-income CTs, and 16 CTs with no income classification in the Cincinnati AA.

Banking competition within the AA is high. According to the June 30, 2022, FDIC Deposit Market Share Report, there are 55 financial institutions with 620 offices serving the Cincinnati AA. The bank ranked 43rd in deposit market share in the AA, with 0.03 percent of total deposit market share. The top five institutions in the June 2022 report had a market share of 87.87 percent. The top five banks in the AA include U.S. Bank, N.A., Fifth Third Bank N.A., PNC Bank, N.A., The Huntington National Bank, and First Financial Bank.

The lending competition within the AA was very strong. In 2020, there were 721 lenders in the AA and Warsaw was ranked 75th with 516 loans and 0.28 percent market share. The top five lenders had a share of 26.69 percent with 48,476 loans. In 2021, there were 739 lenders in the AA and Warsaw was ranked 134th with 225 loans and 0.12 percent market share. The top five lenders had a share of 26.47 percent with 50,972 loans. In 2022, there were 722 lenders in the AA and Warsaw was ranked 104th with 218

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

loans and 0.18 percent market share. The top five lenders had a share of 24.75 percent with 30,248 loans. The top five lenders in 2022 were Fifth Third Bank, N.A., U.S. Bank, N.A., The Huntington National Bank, Union Savings Bank, and Rocket Mortgage, LLC.

The largest cities in the Cincinnati MMSA AA include Cincinnati, Hamilton, Fairfield, Covington, and Mason. Prominent industries include manufacturing, health care and social assistance, educational services, accommodation and food services, professional scientific and technical services and retail trade. Major employers in Cincinnati MMSA are Kroger, Cincinnati Childrens Hospital, TriHealth Inc., University of Cincinnati, and Procter and Gamble, Co.

As of December 31, 2022, the unemployment rate in Hamilton, Butler, and Clermont Counties was 3.0 percent, Warren County was 2.8 percent, and Brown County was 4.3 percent. The Ohio unemployment rate was 4.3 percent. The unemployment for all counties except one were below the state unemployment rate. The unemployment rate for Boone County was 3.0 percent, Campbell and Kenton Counties was 3.1 percent, and Gallatin and Pendleton Counties was 3.4 percent. Grant County unemployment rate was 3.6 percent. The unemployment rate for Kentucky was 3.6 percent. All of the county's unemployment rates were at or below the state unemployment rate. The unemployment rate for Dearborn County was 2.5 percent and Ohio County was 2.2 percent. The unemployment rate for Indiana was 2.7 percent. These counties' unemployment rates were below the state's unemployment rate.

Examiners considered information obtained from three community contacts within the AA to gain an understanding of the community development needs and credit opportunities of the AAs. The community organizations focus on affordable housing and community/social services to low- and moderate-income individuals. They identified the following needs in the bank's AAs: affordable, quality, and safe housing, adequate medical/dental professionals and facilities, employment opportunities, food assistance, financial literacy, homebuyer counseling, and affordable and reliable transportation. They also noted the need for bank personnel to volunteers for financial literacy, participation on board of directors and loan review committee members, funding for general operating support and programs, down payment assistance, alternative products, bank sponsors for FHLB applications, investment opportunities to help capitalize microenterprises and small businesses, renter advocates, and affordable credit and alternative products.

Table A – Demographic Information of the Assessment Area
Assessment Area: Cincinnati AA – 2020-2021

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	493	12.8	23.1	37.1	25.2	1.8
Population by Geography	2,123,742	8.1	20.1	39.6	31.0	1.2
Housing Units by Geography	909,808	10.0	21.6	39.7	28.2	0.5
Owner-Occupied Units by Geography	541,697	3.8	16.9	43.0	36.2	0.1
Occupied Rental Units by Geography	274,716	18.0	28.9	35.2	16.8	1.1
Vacant Units by Geography	93,395	21.8	27.2	34.1	15.7	1.2
Businesses by Geography	154,215	6.6	19.7	36.5	36.3	1.0
Farms by Geography	4,746	3.3	17.2	48.7	30.7	0.1
Family Distribution by Income Level	535,163	22.1	16.8	20.0	41.1	0.0
Household Distribution by Income Level	816,413	25.2	15.5	17.2	42.2	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$69,949	Median Housing Value			\$156,666
			Median Gross Rent			\$764
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS and 2021 D&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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati AA – 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	542	9.8	24.0	36.5	26.8	3.0
Population by Geography	2,218,612	7.0	22.3	38.4	31.0	1.4
Housing Units by Geography	929,397	7.8	24.2	38.2	28.3	1.5
Owner-Occupied Units by Geography	571,712	3.5	18.9	42.0	35.1	0.5
Occupied Rental Units by Geography	283,479	14.5	33.0	32.1	17.7	2.8
Vacant Units by Geography	74,206	15.5	31.4	32.1	17.0	4.1
Businesses by Geography	249,204	5.7	20.3	34.4	38.4	1.2
Farms by Geography	6,405	2.9	18.0	44.9	33.5	0.7
Family Distribution by Income Level	551,641	21.3	17.5	21.1	40.1	0.0
Household Distribution by Income Level	855,191	24.8	15.5	17.5	42.2	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$84,990	Median Housing Value			\$184,623
			Median Gross Rent			\$879
			Families Below Poverty Level			7.9%
<i>Source: 2020 U.S. Census and 2022 D&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>						

Scope of Evaluation in Cincinnati AA

This analysis reflects a full-scope review of the Cincinnati AA. Examiners considered the number of home mortgage loans originated or purchased by the bank from January 1, 2020, through December 31, 2022. Examiners also considered any factors affecting the bank's ability to lend in its AA during the evaluation period, such as demographic and market share information.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of home mortgage loans in the AA.

Home Mortgage Loans

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.

2020-2021

The bank’s distribution of home mortgage loans among geographies of different income levels in the Cincinnati AA is poor. The bank’s percentage of home mortgage loans among low-income CTs in the AA was 1.2 percent. This was below the 3.8 percent of the AAs owner-occupied housing units in moderate-income geographies and the 3.2 percent of aggregate bank lending. The bank’s percentage of home mortgage loans among moderate-income CTs in the AA was 5.5 percent. This is significantly below both the 16.9 percent of the AAs owner-occupied housing units in moderate-income geographies and the 14.3 percent of aggregate bank lending. According to 2021 peer mortgage data, Warsaw ranked 163 out of 392 lenders originating home mortgages in the moderate-income CTs.

2022

The bank’s distribution of home mortgage loans among geographies of different income levels in Cincinnati AA improved in 2022 and is reasonable. The bank’s percentage of home mortgage loans among low-income CTs in the AA was 7.9 percent. This exceeded both the percentage of owner-occupied housing units in low-income CTs geographies of 3.5 percent and the aggregate bank lending percentage of 3.5 percent. The bank’s percentage of home mortgage loans among moderate-income CTs in the AA was 12.4 percent. This was below both the 18.9 percent of the AAs owner-occupied housing units in moderate-income geographies and the 19.1 percent of aggregate bank lending. According to 2022 peer mortgage data, Warsaw ranked 119 out of 403 lenders originating home mortgages in moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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.

2020-2021

The bank’s distribution of home mortgage loans to borrowers of different income levels in the Cincinnati AA is poor. The bank’s percentage of home mortgage loans to low-income borrowers was 2.7 percent. This is below the 22.1 percent of low-income families living in the AA and below the 7.9 percent aggregate bank lending level. Aggregate lending is similarly well below the percentage of AA families. The OCC considered that 10.3 percent of AA families are below poverty level and housing

affordability is challenging to low-income borrowers in the AA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. The maximum low-income annual income calculation is based on 50 percent of the annual Federal Financial Institutions Examination Council (FFIEC) adjusted median family income (MFI). The MFI was \$69,949 in 2021. In 2021, this calculated to a maximum mortgage payment of \$874 for a low-income borrower. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for a down payment, homeowners' insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value of \$156,666 would be \$841 in the AA which may limit affordability for low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers was 12.5 percent. This was below the 16.8 percent of moderate-income families living in the AA and 19.1 percent aggregate bank lending.

2022

The bank's distribution of home mortgage loans to borrowers of different income levels in the Cincinnati AA improved in 2022 and is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 9.6 percent. This is significantly below the 21.3 percent of low-income families living in the AA, but near the 11.9 percent aggregate bank lending which is similarly lower than the low-income family demographics. Housing affordability remained challenging for low-income borrowers based on the updated median housing value and median family income. The bank's percentage of home mortgage loans to moderate-income borrowers is 18.5 percent. It exceeds the 17.5 percent of moderate-income families living in the AA and near the 22.0 percent aggregate bank lending level.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Cincinnati, OH-KY-IN, MMSA	Full Scope	Hamilton, Butler, Clermont, Warren, and Brown Counties in Ohio, Kenton, Boone, Campbell, Pendleton, Gallatin, and Grant Counties in Kentucky, and Dearborn and Ohio Counties in Indiana

Appendix B: Summary of MMSA and State Ratings

RATINGS WARSAW FEDERAL SAVINGS AND LOAN ASSOCIATION	
Overall Bank:	Lending Test Rating
Warsaw Federal Savings and Loan Association	Satisfactory
MMSA:	
Cincinnati, OH-KY-IN, MMSA	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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 30th of each year. Tables without data are not included in this PE.

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

Table 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.

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 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 AA	487	115,704,183	100.0	132,732	3.8	1.2	3.2	16.9	5.5	14.3	43.0	38.2	41.6	36.2	55.0	40.8	0.1	0.0	0.1	
Total	487	115,704,183	100.0	132,732	3.8	1.2	3.2	16.9	5.5	14.3	43.0	38.2	41.6	36.2	55.0	40.8	0.1	0.0	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 AA	178	50,497,022	100.0	79,667	3.5	7.9	3.5	18.9	12.4	19.1	42.0	46.1	41.0	35.1	32.0	35.9	0.5	1.7	0.5	
Total	178	50,497,022	100.0	79,667	3.5	7.9	3.5	18.9	12.4	19.1	42.0	46.1	41.0	35.1	32.0	35.9	0.5	1.7	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%

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
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 AA	487	115,704,183	100.0	132,732	22.1	2.7	7.9	16.8	12.5	19.1	20.0	24.2	21.0	41.1	60.4	36.4	0.0	0.2	15.7
Total	487	115,704,183	100.0	132,732	22.1	2.7	7.9	16.8	12.5	19.1	20.0	24.2	21.0	41.1	60.4	36.4	0.0	0.2	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
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 AA	178	50,497,022	100.0	79,667	21.3	9.6	11.9	17.5	18.5	22.0	21.1	27.5	21.4	40.1	44.4	29.9	0.0	0.0	14.8
Total	178	50,497,022	100.0	79,667	21.3	9.6	11.9	17.5	18.5	22.0	21.1	27.5	21.4	40.1	44.4	29.9	0.0	0.0	14.8

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%

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.