



PUBLIC DISCLOSURE

May 6, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Van Wert Federal Savings Bank
Charter Number: 703551

976 S. Shannon St.
Van Wert, OH 45891-2243

Office of the Comptroller of the Currency

655 Metro Place South, Suite 625
Dublin, OH 43017

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

The Lending Test rating is based on the state of Ohio rating and the following overall conclusions:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of the bank's loans are inside its assessment area (AA).
- The bank exhibits a reasonable geographic distribution of loans in the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels in the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is reasonable.

Van Wert Federal Savings Bank's (Van Wert FSB or bank) quarterly average LTD ratio over the 17 quarters since the previous Community Reinvestment Act (CRA) Performance Evaluation (December 31, 2019, to December 31, 2023) is 68.9 percent. The ratio ranged from a high of 75.8 percent as of March 31, 2020, to a low of 58.5 percent as of December 31, 2023. The quarterly average LTD ratio for similarly situated financial institutions located in or near the AA was 78.3 percent for the same period. The custom peer group consisted of one bank in Van Wert County, one bank in Paulding County, one bank in Mercer County, and two banks in Putnam County. Asset sizes of peer banks ranged from \$151 million to \$259 million, with the quarterly average LTD ratios ranging from 69.5 percent to 92.3 percent.

Lending in Assessment Area

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

The bank originated and purchased 88.3 percent 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	53	88.3	7	11.7	60	6,326	79.3	1,647	20.7	7,973
Total	53	88.3	7	11.7	60	6,326	79.3	1,647	20.7	7,973

*Source: 2021, 2022, and 2023 Bank Data (transaction testing sample).
Due to rounding, totals may not equal 100 percent.*

Description of Institution

Van Wert FSB is a federally chartered stock savings bank headquartered in Van Wert, Ohio. The bank is a subsidiary of a one-bank holding company, VWF Bancorp, Inc., also headquartered in Van Wert, Ohio. Since its inception in 1889, the bank was a mutual until officially converting to a stock federal savings bank in July 2022 and establishing the holding company at that time. The bank's main office in Van Wert, Ohio, is in a middle-income census tract (CT). The main office has a drive-up facility and one onsite automated teller machine (ATM). A second branch location was opened in Allen County, Indiana in April 2024. The bank's expansion into Indiana falls outside the evaluation period. The bank offers both online and mobile banking. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period.

Van Wert FSB is a single state financial institution with one rating area (Ohio) and one AA. The bank continues to serve Van Wert County, Ohio, which is in a non-metropolitan statistical area (OH Non-MSA). Van Wert County, in its entirety, is Van Wert FSB's only AA in the state of Ohio. Van Wert County is in northwestern Ohio, approximately 30 miles east of Fort Wayne, Indiana.

Van Wert FSB serves its community with traditional financial products and services. In addition to traditional mortgage products, the bank participates in the Federal Home Loan Bank's Welcome Home Grant Program, which is designed to remove down-payment and closing cost obstacles for low- and moderate-income individuals. During the evaluation period of 2021 – 2023, the bank closed 29 Welcome Home loans. The bank also has a first-time homebuyer program that offers reduced closing costs. There is no income requirement to participate in this loan product. The bank originated 29 loans during the evaluation period under the first-time homebuyer program.

As of December 31, 2023, the bank had \$244.2 million in total assets and \$34.2 million in tier 1 capital. The bank's net loans and leases totaled \$99.7 million, or 40.8 percent of total assets. The bank's loan portfolio as of the December 31, 2023, Consolidated Report of Condition and Income (Call Report), was comprised of approximately 70.4 percent in residential real estate (including home equity lines of credit), 24.8 percent in commercial and commercial real estate, 3.9 percent in farm, and 0.9 percent in consumer loans. The bank's primary lending focus is residential real estate lending (home mortgage).

Van Wert FSB's lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs of its AA. The bank's previous CRA rating was "Satisfactory" as of the CRA Performance Evaluation (PE) dated December 9, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas. The Office of the Comptroller of the Currency (OCC) used small bank CRA evaluation procedures to assess the bank's performance under the Lending Test. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2021, to December 31, 2023.

The OCC evaluated the bank's lending performance based on its primary lending product, home mortgage lending. Based on the number of loans originated and purchased during the evaluation period, residential real estate loans (including home equity lines of credit) accounted for 79.7 percent, consumer loans accounted for 11.2 percent, commercial and commercial real estate loans (business loans) accounted for 7.8 percent, and farm loans accounted for 1.3 percent. Based on the dollar amount of loans originated and purchased during the evaluation period, residential real estate loans accounted for 67.2 percent, business loans accounted for 28.3 percent, farm loans accounted for 3.2 percent, and consumer loans accounted for 1.3 percent. Consumer, business, and farm loans were not considered in this evaluation as these loan types did not constitute a substantial majority of the bank's lending. Bank management did not request consideration of these loans. The OCC transaction tested home mortgage loans for each year of the evaluation period. Examiners tested 20 loans per year. A minimum of at least 20 loans were needed in a loan product and in each analysis period for a meaningful analysis.

This evaluation period included two census periods. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2021 home mortgages and the 2020 U.S. Census for 2022 and 2023 home mortgages. Two sets of tables are included in Appendix D for each census period. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

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

Van Wert FSB has one AA in Ohio, as described in the "Description of Institution" and "Description of Institution's Operations in Ohio" sections of this evaluation. The OCC completed a full-scope review of the OH Non-MSA.

Ratings

The bank's overall rating is based on the state of Ohio rating. During the evaluation period, Van Wert FSB operated its only office in a single state. Therefore, its overall rating is based on performance solely in Ohio. The state of Ohio rating is based on performance in the OH Non-MSA.

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 Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Ohio

CRA rating for the State of Ohio: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's LTD ratio is reasonable.
- The overall geographic distribution of home mortgage loans is reasonable, given the performance context factors discussed below.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels within the AA.
- The bank has not received any complaints about its performance in helping to meet the AA's credit needs during the evaluation period.

Description of Institution's Operations in Ohio

The bank's only AA includes Van Wert County, Ohio, in its entirety. The bank operates in and primarily lends within this county. Bank management selected the AA based on their targeted lending area and office location. During the evaluation period, the bank operated one office and one ATM in the OH Non-MSA in a middle-income CT. Van Wert City is the county seat and largest city in Van Wert County. The AA is contiguous and does not reflect illegal discrimination or arbitrarily exclude low- and moderate-income areas.

There are nine CTs in this AA. The underlying demographics changed in 2022 due to the 2020 U.S. Census. As of the 2015 ACS U.S. Census, the OH Non-MSA included one upper-income CT (202), while the remaining eight CTs were middle-income. As of the 2020 U.S. Census, CT 202 changed to middle-income, while CTs 205, 206, and 207, changed to moderate-income.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for Van Wert FSB's operations in the AA. The tables below provide a summary of demographic data for the AA.

OH Non-MSA

Demographic Information of the Assessment Area						
Assessment Area: OH Non-MSA - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	28,576	0.0	0.0	84.3	15.7	0.0
Housing Units by Geography	12,672	0.0	0.0	85.3	14.7	0.0
Owner-Occupied Units by Geography	8,594	0.0	0.0	82.2	17.8	0.0
Occupied Rental Units by Geography	2,761	0.0	0.0	92.4	7.6	0.0
Vacant Units by Geography	1,317	0.0	0.0	90.8	9.2	0.0
Businesses by Geography	1,588	0.0	0.0	84.7	15.3	0.0
Farms by Geography	232	0.0	0.0	78.0	22.0	0.0
Family Distribution by Income Level	7,851	16.5	18.1	23.9	41.5	0.0
Household Distribution by Income Level	11,355	19.1	18.0	18.8	44.0	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$97,464
			Median Gross Rent			\$642
			Families Below Poverty Level			9.1%
<p><i>Source: 2015 ACS and 2021 Dun and Bradstreet (D&B) Data.</i></p> <p><i>Due to rounding, totals may not equal 100.0%.</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Demographic Information of the Assessment Area						
Assessment Area: OH Non-MSA - 2022 and 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	33.3	66.7	0.0	0.0
Population by Geography	28,931	0.0	22.4	77.6	0.0	0.0
Housing Units by Geography	12,724	0.0	22.2	77.8	0.0	0.0
Owner-Occupied Units by Geography	9,042	0.0	17.3	82.7	0.0	0.0
Occupied Rental Units by Geography	2,598	0.0	37.7	62.3	0.0	0.0
Vacant Units by Geography	1,084	0.0	26.0	74.0	0.0	0.0
Businesses by Geography	2,724	0.0	20.2	79.8	0.0	0.0
Farms by Geography	371	0.0	6.5	93.5	0.0	0.0
Family Distribution by Income Level	8,315	13.8	22.1	24.6	39.6	0.0
Household Distribution by Income Level	11,640	19.0	15.5	22.5	43.0	0.0
Median Family Income Non-MSAs - OH		\$66,684	Median Housing Value			\$111,493
			Median Gross Rent			\$694
			Families Below Poverty Level			6.2%
<i>Source: 2020 U.S. Census and 2023 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the OH Non-MSA was 28,576, with 84.3 percent of the population living in middle-income CTs, while 15.7 percent of the population lived in upper-income CTs. There were eight middle-income CTs and one upper-income CT in the AA. The AA included 7,851 families and 11,355 households.

As of the 2020 U.S. Census data in the table above, the population of the OH Non-MSA was 28,931, with 77.6 percent of the population living in middle-income CTs and 22.4 percent of the population living in moderate-income CTs. There were six middle-income CTs and three moderate-income CTs in the AA. The AA included 8,315 families and 11,640 households.

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value in the AA was \$97,464 and the median family income for Non-MSAs in Ohio was \$55,785. There were 12,672 housing units in the AA, of which 67.8 percent were owner-occupied, 21.8 percent were rental-occupied, and 10.4 percent were vacant. Low-income families made up 16.5 percent of the families in the AA and moderate-income families made up 18.1 percent of the families in the AA. Families living below the poverty level was 9.1 percent as referenced in the above table.

According to 2020 U.S. Census data, the median housing value in the AA was \$111,493 and the median family income for Non-MSAs in Ohio was \$66,684. There were 12,724 housing units in the AA, of which 71.1 percent were owner-occupied, 20.4 percent were rental-occupied, and 8.5 percent were vacant. Low-income families made up 13.8 percent of the families in the AA and moderate-income

families made up 22.1 percent of the families in the AA. Families living below the poverty level was 6.2 percent as referenced in the table above.

Job Market and Economic Conditions

Economic conditions in Van Wert County were overall stable. As of December 2023, according to the U.S. Bureau of Labor Statistics (BLS), Van Wert County had an unemployment rate (not seasonally adjusted) of 2.3 percent. The unemployment rate has been relatively stable during the evaluation period and below both the Ohio and national unemployment rates of 3.6 percent and 3.7 percent, respectively, for the same period. The population of Van Wert County has been stable, with the U.S. Census Bureau estimate for 2023 being 28,704, compared to 28,931 recorded during the 2020 U.S. Census. Primary employment sectors included manufacturing, agriculture, healthcare, and insurance. Significant employers in Van Wert County included Danfoss, Cooper Farms, Tenneco, Ohio Health (Van Wert Hospital), Braun Industries, and Central Insurance.

Competition

Competition in Van Wert County is moderate and comprised of a diverse mix of community banks, state banks, and branches of large banks. According to the June 30, 2023, Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, there were eight financial institutions competing in Van Wert County, Ohio, with eight offices in the county. The top five financial institutions had a combined market share of 82.8 percent, with Van Wert FSB having the highest deposit market share at 19.1 percent and \$128.2 million in deposits. This accounted for 100 percent of the bank's total deposits as of June 30, 2023. The top four competitors included The Citizens National Bank of Bluffton, First Federal Savings and Loan Association of Van Wert, First Financial Bank, and U.S. Bank National Association (N.A.), which had a combined market share of 63.7 percent.

Strong competition for home mortgage loans also exists. As stated above, the bank's primary loan product is home mortgage lending. The bank is not a Home Mortgage Disclosure Act (HMDA) reporter and is therefore not listed on the 2022 Peer Mortgage Data Report. For reference purposes, there were 95 home mortgage lenders competing in the AA, with the top five lenders maintaining a combined home mortgage market share of 36.1 percent. The top lenders included Superior Credit Union Inc., U.S. Bank N.A., Premier Bank, Rocket Mortgage, and The Union Bank Co.

Community Contacts/Credit Needs

As part of this CRA performance evaluation, the OCC reviewed information provided from an interview with a representative from a community action organization. The organization indicated they have a familiar relationship with most of the banks in the service area. The community contact believed that all banks in the area were relatively responsive, supportive, and willing to extend credit if needed. Identified needs included affordable housing, transportation alternatives due to the lack of public transportation in the region, and a shelter for the homeless population. In general, local financial institutions are adequately meeting the credit and community development needs of the community.

Scope of Evaluation in Ohio

The OCC performed a full-scope review of the OH Non-MSA. Home mortgage lending is the bank's primary lending product and was evaluated under the Lending Test. The OCC transaction tested 20 home mortgage loans for each year of the evaluation period. Refer to the "Scope of the Evaluation" section for more details.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the OH Non-MSA is good.

The bank does not sell loans on the secondary market, nor do they originate Federal Housing Administration (FHA), U.S. Department of Veterans Affairs (VA), or U.S. Department of Agriculture (USDA) Rural Housing loans.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Ohio section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is reasonable.

2021

The OCC did not complete an analysis of the distribution of loans by income level of the geography for 2021. As of the 2015 ACS U.S. Census, the AA contained eight middle-income CTs and one upper-income CT. Since the AA did not include any low- and moderate-income CTs, a review of the geographic distribution of loans would not be meaningful.

2022 – 2023

The geographic distribution of home mortgage loans in 2022 and 2023 was reasonable.

The AA did not include any low-income geographies. Three CTs changed from middle-income as of the 2015 ACS U.S. Census to moderate-income as of the 2020 U.S. Census. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and well below the aggregate percentage of all reporting lenders.

Examiners considered performance context factors such as the median age of housing stock, location of the moderate-income CTs, and competition. As of the 2020 U.S. Census for 2023, the median age of housing stock was 70 years for moderate-income geographies. The cost of home ownership in older

housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. A higher poverty rate (based on families below poverty) in the moderate-income CTs also contributed to lower lending in moderate-income CTs. For 2023, the percentage of families below poverty in moderate-income tracts was 13.2 percent. The bank's single branch is in a middle-income CT, and one of the three moderate-income CTs (205) is not located near the branch, limiting the bank's opportunities to reach all moderate-income geographies. As discussed above, there was strong competition with 95 home mortgage lenders competing in the AA, with the top five lenders maintaining a combined home mortgage market share of 36.1 percent.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed Van Wert FSB's home mortgage loans over the evaluation period to identify any gaps in the geographic distribution of loan activity. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

In evaluating the borrower income distribution of home mortgage loans, the OCC considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different income levels, as well as the economic conditions and demographic data in the AA. Families living below the poverty level was 9.1 percent as of the 2015 ACS U.S. Census and 6.2 percent as of the 2020 U.S. Census, as referenced in the above tables.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels is reasonable.

2021

The distribution of home mortgage loans among individuals of different income levels in 2021 was reasonable.

The percentage of home mortgage loans to low-income borrowers was well below the percentage of those families and was below the aggregate percentage of all reporting lenders. However, the percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of those families and approximately equaled the aggregate percentage of all reporting lenders.

2022 – 2023

The distribution of home mortgage loans among individuals of different income levels in 2022 and 2023 was reasonable.

The percentage of home mortgage loans to low-income borrowers exceeded the percentage of those families and approximately equaled the aggregate percentage of all reporting lenders. The percentage of

home mortgage loans to moderate-income borrowers was near to the percentage of those families and was below the aggregate percentage of all reporting lenders.

Responses to Complaints

Van Wert FSB has not received any complaints about its performance in helping to meet the AA's credit needs 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:	1/1/2021 – 12/31/2023	
Bank Products Reviewed:	Home mortgage loans	
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
State of Ohio		
OH Non-MSA	Full-scope	The AA includes Van Wert County, Ohio, in its entirety.

Appendix B: Summary of State Ratings

RATINGS: VAN WERT FEDERAL SAVINGS BANK	
Overall Bank:	Lending Test Rating
Van Wert Federal Savings Bank	Satisfactory
State:	
Ohio	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

State of Ohio

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		
	#	\$ (000s)	% 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
OH Non-MSA	20	3,304	100.0	799	0.0	0.0	0.0	0.0	0.0	0.0	82.2	75.0	83.1	17.8	25.0	16.9	0.0	0.0	0.0
Total	20	3,304	100.0	799	0.0	0.0	0.0	0.0	0.0	0.0	82.2	75.0	83.1	17.8	25.0	16.9	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
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		
	#	\$ (000s)	% 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
OH Non-MSA	40	4,066	100.0	557	0.0	0.0	0.0	17.3	10.0	24.4	82.7	90.0	75.6	0.0	0.0	0.0	0.0	0.0	0.0
Total	40	4,066	100.0	557	0.0	0.0	0.0	17.3	10.0	24.4	82.7	90.0	75.6	0.0	0.0	0.0	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
OH Non-MSA	20	3,304	100.0	799	16.5	5.0	9.5	18.1	25.0	26.0	23.9	15.0	22.8	41.5	55.0	27.2	0.0	0.0	14.5
Total	20	3,304	100.0	799	16.5	5.0	9.5	18.1	25.0	26.0	23.9	15.0	22.8	41.5	55.0	27.2	0.0	0.0	14.5

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
OH Non-MSA	40	4,066	100.0	557	13.8	15.0	15.3	22.1	20.0	26.4	24.6	27.5	22.1	39.6	37.5	26.0	0.0	0.0	10.2
Total	40	4,066	100.0	557	13.8	15.0	15.3	22.1	20.0	26.4	24.6	27.5	22.1	39.6	37.5	26.0	0.0	0.0	10.2

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